



Cabinet

Wednesday, 24 July 2024 at 5.30 p.m.

Council Chamber - Town Hall, Whitechapel

Supplementary Agenda 2 – Local Plan 2038 Regulation 19 Consultation

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<p>Report Summary: This report seeks approval to publish the proposed submission version of the Local Plan and associated documents and undertake the statutory Regulation 19 consultation on those documents.</p> <p>Wards: All Wards</p> <p>Lead Member: Cabinet Member for Regeneration, Inclusive Development and Housebuilding</p> <p>Corporate Priority:</p>		



Agenda Item 6.2

<p>Cabinet</p> <p>24 July 2024</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Paul Patterson, Corporate Director for Housing and Regeneration</p>	<p>Classification: Unrestricted</p>
<p>Tower Hamlets Local Plan 2023 – 2038 – Regulation 19 Consultation, Proposed Submission Version</p>	

Lead Member	Councillor Kabir Ahmed, Cabinet Member for Regeneration, Inclusive Development, and Housebuilding
Originating Officer(s)	Marissa Ryan-Hernandez, Strategic Planning Manager Steven Heywood, Principal Planning Officer, Strategic Planning Team
Wards affected	All wards
Key Decision?	Yes
Reason for Key Decision	Significant impact on wards
Forward Plan Notice Published	26 April 2024
Exempt information	N/A
Strategic Plan Priority / Outcome	<ul style="list-style-type: none"> • Homes for the future • Boost culture, business, jobs and leisure • A clean and green future • A council that works for you and listens to you

Executive Summary

The Local Plan is the borough's most important planning document. It sets out a vision, strategic priorities, planning policy framework, and site allocations that guide all development in the borough. Its purpose is to help inform decisions on planning applications and to meet the council's national and regional planning policy duties, as well as achieving local objectives as set out in the Mayor's Strategic Plan, including delivering the housing, and particularly social housing. The borough needs, to help address overcrowding – standing at 12,000-15,000 – and the social, economic and health inequalities that are directly related to it as well as the new government's ambitious 1.5 million new homes target (300,000 per annum). The council is willing to go high and dense to help meet its local needs but also the government's ambitious targets. To date, the council has excelled in delivery of affordable homes between 2008-2014. In this period, three years in a row, the council delivered the most homes in the country and received £90m new homes bonus, and this ambition to continue delivering remains. The Local Plan also promotes community and regeneration benefits, as well as facilitating the delivery of high-quality jobs and community infrastructure for our residents.

The preparation of a new Local Plan has been identified as a priority for the council, to help manage future population growth and meet the needs of existing and future residents and communities, as well as to respond to major planning policy changes that have taken place at a national and regional level since the current Local Plan was adopted in 2020. The development of the new Local Plan has involved significant internal and external consultation, and the development of an up-to-date evidence base, to ensure that the proposals within the plan are positively prepared and justified by an understanding of the needs of the borough. In drafting the Local Plan, the council have sought to explore and test the parameters of higher order policies and their requirements on boroughs when writing policy, and it does so as it believes the issues our communities face, require a new response and approach when addressing challenges such as the housing need crisis and the implications this has on our communities.

This report seeks approval to undertake a six-week consultation on a proposed submission version of the new Local Plan, with an associated policies map, Integrated Impact Assessment (IIA), consultation statement, and supporting evidence base documents. Following this consultation, and after a further resolution by Full Council, these documents and any representations received as part of the consultation will be submitted to the Secretary of State for Housing, Communities and Local Government to begin an independent examination in public. This process will determine whether the plan is sound and legally compliant and can be adopted by the council.

Reasons for Urgency

The Mayor asked officers to make a change to the approach to tall buildings, including exploration of the removal of maximum heights from some site allocations. This was due to the fact that it was believed this may help identify opportunities for the delivery of homes, and specifically affordable homes. Furthermore, the Mayor

has asked that officers take account of the new government's aspirations. Making the changes in the Cabinet report and appendices has required additional time.

The item must be considered at this Cabinet meeting on 24 July, as delaying further until September will delay the much-needed consultation on the policies in the Regulation 19 Local Plan, which the Mayor is keen to get feedback on. This is required in order to finalise the Plan, so that it can begin to be implemented and help with facilitating the delivery of homes. Furthermore, delaying the report to Cabinet increases the risk of missing the transitional deadline to develop a Local Plan under the current Act.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Consider this cabinet report which seeks to progress the Local Plan and approve one of the following options:
 - Option A – Publication of the Local Plan, with changes to the approach to tall buildings, with the aim to increase housing supply to the borough and note the legal and finance sections of the report
 - Option B – Publication of the Local Plan, without changes to the approach to tall buildings
 - Option C – Retain the current local plan
 - Option D – Undertake partial review of current Local Plan
 - Option E – Undertake further work on the new Local Plan before consultation and submission
2. Note that alongside publication of the chosen proposed submission version of the Tower Hamlets Local Plan 2038, the accompanying policies map, Integrated Impact Assessment, consultation statement, and evidence base studies will also be published for the six-week public consultation;
3. Authorise the Corporate Director for Housing and Regeneration, in consultation with the Mayor, to make any appropriate and necessary minor amendments to the chosen proposed submission version of the Local Plan and any associated documents prior to the commencement of the consultation, should Cabinet approve publication;
4. Agree that, following Regulation 19 consultation, a report will be brought to Full Council noting any risks emerging from the Regulation 19 consultation responses and seeking approval to submit the Local Plan and associated documents to the Secretary of State for Housing, Communities and Local Government to begin an independent examination in public.

1 REASONS FOR THE DECISIONS

- 1.1 Local plans are a key document within the English planning system, with their role and content laid out under the Town and Country Planning Act 1990 (TCPA) and the Planning and Compulsory Purchase Act 2004 (PCPA), and related regulations. They provide an opportunity for a Local Planning Authority to set out a strategic vision for how development within their area should take place, and to set out detailed policies against which proposals for new development will be assessed. This ensures that decisions about development are taken positively, and that residents, councillors and developers have a clear understanding of the kind of development that will be considered acceptable. If a development proposal conforms with the development plan for an area (which includes the London Plan, the Local Plan, and any relevant neighbourhood plans), there is a strong presumption in national policy that it should be approved; where a proposal conflicts with the development plan, permission should not usually be granted.
- 1.2 The proposed submission versions of the Local Plan submitted with this report has been through significant internal consultation with relevant teams across the council and reflects the council's priorities in areas including affordable housing, housing quality, tall buildings, employment policy, community infrastructure, environmental policy, and transport and connectivity. It has also undergone two rounds of public consultation – an early engagement exercise to determine what the plan should include, and a statutory consultation (known as a Regulation 18 consultation) on a previous draft of the plan. The next stage of the plan making process under the legislation is a second round of statutory consultation, known as a Regulation 19 consultation, and then submission of the plan to the Secretary of State to begin the examination process.
- 1.3 The National Planning Policy Framework (NPPF, latest version dated December 2023) is the key document setting out national planning policy. The current version states that “policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary” (paragraph 33). If local plans are not reviewed and, where necessary, updated every five years there is a risk that the policies the plan contains may be considered out-of-date. If the relevant policies for determining an application are considered out-of-date, the NPPF sets a strong presumption in favour of granting permission even where there is a conflict with those policies. This situation can lead to the council losing planning appeals, and inappropriate development being granted permission.
- 1.4 The Levelling Up and Regeneration Act (LURA 2023) introduced a new approach to the plan-making system. This would necessitate a different approach to the production of a local plan. However, under transitional arrangements, plans submitted to the Secretary of State before 30 June 2025 will be examined under the existing plan-making system. The recommendations in this report would ensure that the Local Plan can be

submitted before that deadline – if this is not achieved, the process of producing a sound local plan will need to begin again under the new system introduced by the LURA 2023, adding significant delay and cost to the process.

- 1.5 In addition to the legal and national policy requirements to produce a new local plan, there have been a number of social, environmental, political, economic and local changes that require an up-to-date response, including acute overcrowding, the impacts of the coronavirus pandemic and Brexit, the cost-of-living crisis, the election of a new administration in Tower Hamlets and new planning ambitions of the incoming national Labour government. Imminent publication of a revised version of the NPPF has been trailed by the new national government, but as of writing, has yet to be published. It is expected at the end of July 2024.
- 1.6 The council's current Local Plan was adopted in January 2020. The recommendations in this report would ensure that the updated Local Plan can be submitted well before the 30 June 2025 deadline, and the new Local Plan will be adopted in 2025 (subject to Planning Inspectorate timescales for the examination), ensuring that the development plan for the borough remains up-to-date and the council will be able to continue making positive decisions on planning applications in line with the strategic vision and detailed requirements of the Local Plan.

2 **OPTIONS**

OPTION A – APPROVE PUBLICATION OF THE LOCAL PLAN, WITH CHANGES TO THE APPROACH TO TALL BUILDINGS

- 2.1 This option responds to the statement from the Mayor at the 10 July 2024 Cabinet meeting, in which he stated that he had asked officers to explore the removal of maximum heights from some allocations in order to identify opportunities for the delivery of new homes. On this basis, he asked for the Local Plan agenda item to be postponed until the 24 July 2024 Cabinet meeting to provide the time to make these changes. It should be noted that there are a range of legal and finance risks associated with this option.
- 2.2 This option is to approve the publication of a version of the Local Plan that includes significant changes to the approach to tall buildings. These changes include:
- Removal of the reference to an appropriate maximum height from Tall Buildings Zone B (Canary Wharf)
 - Removal of references to appropriate heights from nine site allocations, including all six allocations within Tall Buildings Zone B. The sites in question are North Quay, Billingsgate Market, Wood Wharf, 10 Bank Street, Westferry/Park Place, Riverside South, Marsh Wall East, Limeharbour, and Blackwall Trading Estate and Council Depot.

- Removal of references to the need for building heights to step down from One Canada Square and references to the importance of protecting views to One Canada Square as the focal point of Tall Building Zone B
- 2.3 All other site allocations and tall building zones will retain their references to appropriate heights. The potential implication is that Tall Building Zone B and the nine site allocations referenced above would have greater flexibility to negotiate taller buildings, if the plan is adopted as currently drafted, as there would be no limit on their height set by the policies or allocations.
- 2.4 This is a more permissive approach to tall buildings than was consulted on at Regulation 18 and could potentially lead to additional housing being developed within the borough through the delivery of very tall buildings in these locations. However, the London Plan requires that boroughs identify locations where tall buildings are considered suitable and appropriate heights within those locations. Under Option A, there is therefore a risk that the plan will be found to be not in conformity with the London Plan. This could delay the examination of the plan or potentially lead to it being found unsound. This accordingly, would result in the risks associated with not having an up to date plan, set out elsewhere in this report. (i.e. option C)
- 2.5 Additionally, the approach in Option A does not reflect the evidence base prepared for the Local Plan, which included design-led site capacity studies of sites in order to determine appropriate heights, a characterisation and growth strategy to determine areas suitable for tall buildings, and a views and landmarks study to determine views that should be protected in the plan. This raises the risk of a planning inspector finding the plan not to be justified, which would also delay the examination of the plan or potentially lead to it being found unsound. Wider considerations, such as the national, regional and local priority to accelerate housing delivery, hold weight, and the policy has been redrafted to reflect this.

OPTION B – APPROVE PUBLICATION OF THE LOCAL PLAN, WITHOUT CHANGES TO THE APPROACH TO TALL BUILDINGS

- 2.6 This option is to approve the publication of a version of the Local Plan that does not include a revised approach to tall buildings, (as compared to the regulation-18 version of the draft plan) discussed under Option A. Under this option, all site allocations and Tall Building Zones would retain references to appropriate heights. This option reduces the legal and finance risks in comparison to Option A.
- 2.7 This would be a less permissive approach to tall buildings than Option A, in the sense that Tall Building Zone B and the nine site allocations would have limits to their height set by the policies and allocations. The borough would still have one of the most permissive tall building policies in the country, due to the introduction of the extensive Tall Building Zone F through the Regulation 18 consultation.

- 2.8 This option would follow the requirement of the London Plan to identify locations suitable for tall buildings and appropriate heights within those locations. It would also more closely follow the evidence base, particularly the design-led site capacity studies and the views and landmarks study. On this basis, Option B reduces the risk of the plan being found unsound.

OPTION C – RETAIN THE CURRENT LOCAL PLAN

- 2.9 This option is not recommended, because it would create a heightened risk of policies within the plan being found out-of-date. Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans at least once every five years from their adoption date to ensure they remain up-to-date. If a local authority does not have an up-to-date plan, there is a risk that paragraph 11 of the NPPF will be triggered and policies within the adopted plan will be found out-of-date. In these circumstances, applicants could appeal the council's planning decisions, and if a planning inspector agreed that relevant policies are out-of-date, the NPPF sets out a strong presumption in favour of permission being granted – even where aspects of the proposal may be in conflict with the council's adopted policy positions.
- 2.10 Without a new local plan, the council is not able to best respond to updates in planning legislation and national and regional guidance – in particular, the current Local Plan was prepared before the adoption of the current London Plan, and there are some areas where the current Local Plan is not in conformity with the London Plan, creating the opportunity for conflict within the development plan.
- 2.11 Similarly, any changes to local planning policy that are required, either due to changes in local needs for housing and infrastructure or new political priorities, can only be implemented through the delivery of a new local plan.
- 2.12 Furthermore, this option was previously presented to Cabinet on 25 October 2023, as an alternative option on the report recommending approval to begin the first statutory consultation on the new Local Plan. Cabinet declined to take this option.

OPTION D – UNDERTAKE PARTIAL REVIEW OF CURRENT LOCAL PLAN

- 2.13 This option could be taken by Cabinet if they feel that only a review of certain policies in the Local Plan is needed, either to respond to changes in legislation and national policy or to reflect very specific political priorities.
- 2.14 This option is not recommended for three reasons. Firstly, there have been a number of economic, social and political changes since the current Local Plan was adopted, and much of the evidence base that the current plan was based on is now out-of-date and does not reflect changes to the demographics of the borough, or changes brought about by the impacts of the cost of living crisis, Brexit, or the coronavirus pandemic. A new Strategic

Plan has also been prepared since the current Local Plan was adopted, and this clearly sets out a new vision and set of aspirations for the borough. On this basis, the number of necessary changes points to the need for a full review rather than a partial one.

- 2.15 Secondly, policies in a local plan should be read as a whole, and it is difficult to disentangle the effects of one policy from another. Conducting a partial review that attempts to only change a few policies can therefore become complicated and time- and resource-consuming as the knock-on effects of cumulative changes becomes apparent.
- 2.16 Thirdly, Cabinet was presented with this option on 25 October 2023, as an alternative option on the report recommending approval to begin the first statutory consultation on the new Local Plan, and declined to take it. Since that decision, significant time and resources have been expended on preparing a fully updated version of the Local Plan that reflects the priorities of the Strategic Plan, in line with Cabinet's decision to move ahead with a full review. To now revert to a partial review would require further time and resources to be invested in returning to the current Local Plan and preparing a partially updated version, and would, as with Option A, cause a delay that could lead to the current Local Plan policies being considered out-of-date, creating a risk of development being granted permission despite conflicts with the council's planning policies.

OPTION E – UNDERTAKE FURTHER WORK ON THE NEW LOCAL PLAN BEFORE CONSULTATION AND SUBMISSION

- 2.17 This option could be taken by Cabinet if it feels that significant changes are needed to the draft Local Plan in order to ensure it reflects the council's priorities. This would involve redrafting and potentially the development of further evidence base documents to justify the council's position.
- 2.18 This option is not recommended for three reasons. Firstly, as described under Options A and B above, a delay could lead to the current Local Plan policies being considered out-of-date, creating a risk of development being granted permission despite conflicts with the council's planning policies.
- 2.19 Secondly, a delay is likely to mean that the new Local Plan misses the 30 June 2025 deadline for submission of local plans under the existing plan-making system, as discussed in paragraph 1.4 above. This would mean that a new local plan would need to be prepared under the new plan-making system set out under the LURA 2023, and this would essentially require work on the plan to begin again, adding significant delay and costs to the process.
- 2.20 Thirdly, officers believe that the proposed submission versions of the Local Plan within Options A and B closely reflect the priorities of the council and has been developed in close consultation with the community, with teams from across the council, and with elected members. The plan has then been prepared by officers to express the council's priorities in terms that are

consistent with national and regional planning policy, which ensures that the plan can be found sound and legally compliant at an independent examination. Further significant changes are therefore considered unnecessary and could potentially conflict with national or regional planning policy, potentially creating a risk of the plan being found unsound at examination. This would also add significant delay and costs to the process.

- 2.21 Cabinet should not take this option if it believes that minor changes are needed to the Local Plan before consultation, as the report recommends that such minor changes can be made under the delegated authority of the Corporate Director for Housing and Regeneration.

3 DETAILS OF THE REPORT

The need for a new local plan at this time

- 3.1 National planning policy and legislation is clear that local authorities are expected to maintain up-to-date local plans, as set out in paragraph 1.3 above. This means that local plans should be reviewed and, where necessary, updated at least once every five years to ensure they remain up-to-date.
- 3.2 The council's current Local Plan was adopted in January 2020. It provides a planning policy framework for the borough up to 2031. However, upon conducting a review of the adopted plan in 2022, officers determined that several of the objectives and policies contained in the plan could be considered outdated, due to national, regional, and local changes. In planning policy terms, this includes the adoption of the current London Plan in March 2021, changes to the NPPF, and changes to guidance on issues including fire safety and energy efficiency.
- 3.3 Since 2020 there have also been numerous social, environmental, political and economic shifts, both globally and locally, including the impacts of the coronavirus pandemic, the impacts of Brexit, the cost-of-living crisis and acute overcrowding that has increased as a direct result of the population growth. New census information has shown that from 2011 to 2021, the population of Tower Hamlets increased by 22.1% from 254,100 to 310,300. This marks a significant proportional increase and represents the fastest population growth of any local authority in England. There has also been the election of a new administration in Tower Hamlets as well as the new national government.
- 3.4 Additionally, the planning powers for the parts of the borough currently in London Legacy Development Corporation (LLDC) boundary, will be passed back to Tower Hamlets by the end of 2024. These areas are Fish Island, Hackney Wick and Bromley-by-Bow. It is important that these areas have an up-to-date planning framework in place that reflects the council's priorities for them.

- 3.5 The cumulative impact of these changes led officers to the conclusion that a new local plan would be the best path forward, rather than a partial review, and this was agreed by Cabinet on 25 October 2023.
- 3.6 Alongside the need to ensure plans are updated every five years, there is another timing factor to take into account. The Levelling Up and Regeneration Act (LURA) passed into law in October 2023. The act sets out a framework for an updated plan-making system. Local plans under the LURA framework will be produced in a very different way from existing local plans, with a strict 30-month timeline for production, an increased focus on digital elements of plan-making, and the introduction of National Development Management Policies set by the national government, which local plans will be expected not to repeat or contradict. However, the LURA framework will not be implemented immediately, and there is a deadline of 30 June 2025 for local authorities to submit local plans for examination under the existing plan-making system. If the council is to submit the proposed Local Plan under the current plan-making framework, it must meet this deadline, otherwise work will have to begin again under the LURA framework – which would mean the adoption of a plan being delayed until the end of 2027 at the earliest. This would lead to the council not having an up-to-date plan, and all the risks associated with this (as set out above within Option C).
- 3.7 Finally, the council shares the ambitious and transformative vision of the new national government with regards to housebuilding and planning, and this is captured in the Local Plan. The new government’s changing ambitions to planning laws nationally is noted in the new Chancellor of the Exchequer’s speech in early July 2024. The new government recognises the outdated constraints of planning law and the need for change. The Mayor shares this view and wants to test what can be done and to think outside of existing norms and established standards – to think creatively about how we address overcrowding and the social, economic and health inequalities associated with this issue.

Preparing the Local Plan

- 3.8 The preparation of a 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 evidence is required to support a local plan. These requirements are primarily set out in The Town and Country Planning (Local Planning) (England) Regulations 2012 (‘the TCPA Regulations’). The Local Plan must be prepared in accordance with the NPPF and must be in conformity with the London Plan.
- 3.9 The NPPF explains that local plans “are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound” (paragraph 35). To be found sound, a local plan must be:
- Positively prepared: it seeks to meet objectively assessed needs for housing and other land uses;

- Justified: the policies in the plan are supported by evidence;
- Effective: 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: it has been prepared in accordance with the NPPF and any other national statements of policy.

3.10 As part of the process of developing the Local Plan, on-going discussions took place with both internal and external stakeholders through individual and group meetings, including:

- **The Mayor's office** – at the regular planning meeting with the Mayor, where key updates on engagement and the content of the plan have been presented. The Mayor and the Cabinet Member for Regeneration, Inclusive Development and Housebuilding, have provided a steer on aspirations and policy direction to ensure alignment with the new Strategic Plan.
- **Internally** – input of colleagues from across the council was sought at a regular steering group meeting and regular working group meetings were held with officers across each of the plan's policy theme areas. These discussions were followed by presentations to DLT and CLT, and further engagement with relevant officers where necessary.
- **Externally** – external discussions have been held with stakeholders including the Greater London Authority, Transport for London, Historic England, the Environment Agency, Network Rail, the Canal and River Trust, the London Boroughs of Newham, Greenwich and Hackney, the City of London Corporation, the London Legacy Development Corporation, neighbourhood forums, and key landowners and developers.

3.11 The new Local Plan will cover a period from 2023 to 2038. The Local Plan contains a strategic vision for the borough for the next 15 years, and sub-visions for each of four sub-areas (based on the Opportunity Areas set out in the London plan): City Fringe, Isle of Dogs and South Poplar, Leaside, and the Central area. It contains planning policies across the following themes: delivery, housing, environment, design, employment, town centres, community infrastructure, biodiversity and open space, movement and connectivity, and waste. It also contains 32 site allocations, which set out specific sites for the development of housing and other uses across the borough, all of which are expected to provide at least 500 new homes. Once the plan is adopted, all planning applications will be assessed against the relevant policies in the plan, and applications for development on site allocations will also be expected to meet the specific requirements set out in the allocations.

3.12 The policies in the Local Plan have been informed by an evidence base and local need. This consists of a range of documents that focus on areas of planning policy, examine data in relevant areas, and provide recommendations and conclusions about how to most effectively meet the area's needs. By preparing and responding to this evidence base alongside, consultation responses and addressing local need, the council ensures that

the Local Plan can be justified. These evidence base documents must be submitted to the Secretary of State alongside the Local Plan, to be considered as part of the examination of the plan. Please see Appendix 5 for a full list of the evidence base documents that will be published as part of the Regulation 19 consultation and are intended to be submitted to the Secretary of State.

- 3.13 The proposed submission version of the Local Plan is attached to this report as Appendix 1 (Appendix 1A or 1B to reflect the associated options). It is accompanied by a policies map showing the spatial extent of policies within the borough – this is attached as Appendix 2. The evidence base includes an Integrated Impact Assessment (IIA), which meets the statutory requirement for the Local Plan to be accompanied by a sustainability appraisal and a Habitats Regulations screening and assessment. The IIA also contains the outcomes of the equalities impact screening and assessment, and is attached as Appendix 3 (similarly with options 3A or 3B to reflect assessments of the alternative approaches to height/tall buildings) and the full report will be published as part of the consultation. The remaining evidence base documents have not been attached to this report due to the quantity of documents involved but will be published alongside the proposed Local Plan during the consultation.

Consulting on the Local Plan

- 3.14 The draft new Local Plan has been informed by early engagement that was held from January-March 2023, and a statutory consultation in line with the requirements of regulation 18 of the TCPA Regulations that was held between November-December 2023. Both stages of consultation lasted six weeks, and included a range of digital, interactive and accessible events to ensure maximum outreach across the community. Events were held both online and in-person and included promotion through social media, emails, website, newsletters, press notices and posters/leaflets.
- 3.15 During the early engagement consultation, the council received over 6,000 online visits across the 'Let's Talk' website and the interactive 'Story Maps' platform. The Local Plan engagement document was downloaded 500 times and there were 392 submissions to the consultation and approximately 115 attendees across the events. During the Regulation 18 consultation, 25 in-person and online events were held, with a total of over 270 attendees, and 390 representations were received. Following both consultations, the responses were carefully considered by officers and used to inform the drafting of the proposed Local Plan. Please see Appendix 4 for a Consultation Statement that sets out more detail on these earlier stages of consultation.

Changes to the plan since regulation-18 Consultation

- 3.16 The Mayor asked officers to make a change to the approach to tall buildings, including the removal of maximum heights from some site allocations as he felt this will help identify opportunities for the delivery of homes, and specifically affordable homes. It was the Mayor's view that it was necessary to take account of the new government's aspirations, ahead of them being

translated into formal planning policy. Making the changes in the Cabinet report and appendices has required additional time. Further detail is set out below.

Tall Buildings

- 3.17 As set out in section 2, a key change from Regulation 18 within the option A version of the proposed submission plan, is the removal of heights guidance from Canary Wharf Tall Building Zone (TBZ) B including site allocations 4.8 North Quay and 4.2 Billingsgate Quay, as well as removing height guidance from 4.5 Marsh Wall, 4.4 Limeharbour and 3.5 Blackwall Depot, as set out as part of policy PS2, Table 4 and the 'Site Allocations' chapter. These sites are strategically situated in opportune locations for height and density, and economic regeneration. The principle of this change sits alongside Tall Building Zone (TBZ) F, which indicates a more permissive approach to tall buildings in the area of borough not previously covered by a Tall Building Zone.
- 3.18 This change provides further opportunity for the delivery of homes, and specifically affordable homes which would be a requirement on tall buildings, which serves as a priority for the Council. It also helps to address the endemic overcrowding within the borough, married to the rapidly increasing population density. Tower Hamlets is the most densely populated borough with a small surface [area 7 ½ square miles] and therefore there is a need to build 'up' to address these issues, i.e., the social and economic inequalities that are born of such issues as overcrowding, the disproportionate impact that these issues have on BME residents, the negative impact that these issues have on familial life including, health outcomes, educational attainment, childhood development and marital issues.
- 3.19 The evidence base commissioned for the new Local Plan sets out alternative information and direction for Tall Building Zone B and the five (5) sites as published in the Regulation 19 document for their tall building approach. Wider considerations, such as the national, regional and local priority to accelerate housing delivery, hold weight, and the policy has been redrafted to reflect this.
- 3.20 All other proposed height guidelines for the borough remain, and the council recognises existing parameters as set by higher order policy, all the while aspiring to the new planning and development ambitions of the new national government.
- 3.21 The heights approach continues to address the London Plan's requirement that boroughs should identify locations for tall buildings and indicate appropriate heights within those locations in their Local Plan. There may be questions from statutory consultees about how the London Plan policy is interpreted with regard to the removal of detail, and whether this impacts on matters of soundness.
- 3.22 Option B carries forward the same approach to tall buildings as was consulted on at regulation-18 (i.e. no change.)

Meeting Gypsy and Traveller pitch needs

- 3.23 There is a potential conformity issue on the provision of Gypsy and Traveller (G&T) pitches to address the GLA's London wide needs assessment which indicates the need for additional G&T pitches (approx. 18 or 0.5 hectares of land). The GLA's position is that G&T fall under the protected characteristics of the Equalities Act, and for a Local Plan to proceed smoothly through examination it needs to be demonstrated that G&T housing need is being met. As the outputs were provided after the council's Regulation 18 was published and a review of sites has demonstrated that sites in council ownership are not suitable for development as G&T sites, this will remain an outstanding matter that will need to be assessed through examination in public.

Progressing to regulation-19 consultation

- 3.24 This report is recommending (recommendation 1) that the Local Plan now be given approval to proceed to the next stage of statutory consultation, which is based on regulation 19 of the TCPA Regulations. At this stage, the council is required to publish the proposed submission version of the Local Plan for consultation – that is, a version of the plan that the council thinks is sound and legally compliant. Consultees are then able to submit representations highlighting any areas where they believe the plan may not be sound or legally compliant.
- 3.25 The risks identified in the report will emerge from the feedback from Regulation 19 consultation and could potentially challenge our position on the policy areas identified above. During the Regulation 19 consultation period, officers will continuously monitor feedback and assess any risk to the plan and, if required, commission any additional evidence to address concerns emerging from consultation feedback to manage any risk to Local Plan submission. If the feedback from statutory consultees to our approach presents significant risk to the council's programme to submit the plan to the Secretary of State for Examination, officers will bring this to the attention of Full Council for consideration at the end of Regulation 19 Consultation in winter 2024/25.
- 3.26 If the recommendations in this report are approved, the consultation is expected to take place in October-November 2024. Planning officers will work with the Mayor's office and the Communications team to ensure that the consultation reaches as many residents and other stakeholders as possible, and that inclusivity of the consultation is carefully considered.
- 3.27 The consultation will include a mix of in-person and online sessions allowing residents and other stakeholders to ask questions about the plan and understand how to make representations. As with the regulation 18 consultation, an interactive online policies map will be provided alongside an online survey to gather representations on the plan. Information and paper copies on how to contribute to the consultation in Ideas Store and in the Town Hall. A consultation and communications strategy will be prepared before the consultation begins, in collaboration with the Communications team and the Mayor.
- 3.28 This report recommends (recommendation 3) that delegated authority be given to the Corporate Director for Housing and Regeneration to make any minor modifications necessary to the Local Plan before the consultation begins, in consultation with the Mayor. This is to allow for the correction of any typographical or grammatical errors, or the addition of small amounts of content not yet prepared, such as forewords or introductions.

Submission of the Local Plan

- 3.29 Following the end of the regulation-19 publication period, this report notes (recommendation 4) that approval will be sought from Full Council to proceed to the next stage of the plan-making process, which is to submit the Local Plan to the Secretary of State for Housing, Communities and Local Government to begin an independent examination of the plan.
- 3.30 Officers will consider the consultation responses, including those from statutory bodies such as the Greater London Authority, and whether there are potentially parts of the plan that may be unsound or legally non-compliant. If there are potential changes that are considered appropriate to make the document sound, officers will then work with stakeholders where appropriate, and prepare a table of proposed modifications to the submission version of the Plan. In addition, the Inspector may request that the council undertake additional work ahead of the hearings to address any issues.
- 3.31 The Consultation Statement (Appendix 4) will also be updated to contain a summary of responses received at the Regulation 19 consultation. If approval is given by Full Council, the following documents will then be submitted to the Secretary of State:
- Local Plan Submission Version
 - Local Plan Policies Map
 - Integrated Impact Assessment
 - Consultation Statement
 - Consultation responses received during Regulation 19 consultation
 - All relevant evidence base documents (the expected list of which is set out in Appendix 5)
 - Table of proposed modifications (if relevant)
- 3.32 If the recommendations in this report are approved and the Regulation 19 consultation is held in October-November 2024, submission of the Local Plan to the Secretary of State is expected to take place in early 2025.
- 3.33 Upon submission, the Secretary of State will appoint an inspector from the Planning Inspectorate to commence the examination of the Local Plan. During the examination process, the inspector will determine through a series of public hearings and written responses whether the plan is sound and legally compliant. If necessary, the inspector can propose modifications that are necessary to make the plan sound – if this is done, the council will be required to undertake a further consultation on these modifications. At the conclusion of the process, the inspector will prepare a report on the Local Plan, and if they find that the plan is sound (with or without modifications) and legally compliant, the council can proceed to formally adopt the Local Plan.

4 EQUALITIES IMPLICATIONS

4.1 As part of the process of developing the Local Plan, an Integrated Impact Assessment (IIA) has been prepared. This meets the statutory requirement for the production of a Sustainability Appraisal of the Local Plan, and also includes an equalities impact screening and assessment. The non-technical summary of the IIA is attached to this report as Appendix 3.

4.2 The equalities impact assessment identifies a likely positive impact on the following protected characteristics:

- Age - older people who have reduced mobility, suffer from social isolation and loneliness and require access to health and other services will benefit through improved access to services as well as provision of supported living including care homes. Young people seeking education, training and accessible employment opportunities will also experience positive impacts. Young children are likely to benefit from air quality improvements that numerous policies look to achieve
- Disability - people with a variety of disabilities including mobility issues will benefit from a more accessible public realm, including open spaces, pedestrian routes and key services. The plan includes policies which support inclusive design which will help to improve connectivity and function, benefiting users with mobility limitations. The plan ensures that 10% of all new units are wheelchair accessible, improving access to housing
- Deprivation - policies are likely to benefit people from low-incomes who require improved access to employment, education and housing. Policies geared towards the provision of a wide range of employment opportunities at all levels as well as closing the skills gap through upskilling will be useful to low-income groups who are currently positioned as unable to access higher paid jobs. Additionally, the provision of affordable homes and supported living such as homeless shelters will be beneficial to this group. The ambition of the plan to deliver an affordable housing target would make a positive impact on deprivation, reducing barriers for low-income families to housing and rental markets.
- Gender reassignment, sex and gender, and race - people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.

4.3 The assessment identifies potential negative effects on the following protected characteristics:

- Age, disability, and pregnancy and maternity - The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups

- Deprivation - Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.

4.4 The assessment identifies a neutral impact on the remaining protected characteristics – religion or belief, sexual orientation, and marriage and civil partnerships.

5 OTHER STATUTORY IMPLICATIONS

5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

5.2 There are no statutory implications relating to best value, risk management, crime reduction, or safeguarding. Requirements for consultation have been addressed as part of the main report. Statutory requirements relating to environmental and sustainability issues have been assessed as part of the Integrated Impact Assessment, the non-technical summary of which is attached as Appendix 3.

5.3 With regards to data protection, the government's Procedure Guide for Local Plan Examinations notes the following: "To ensure an open and fair examination, it is important that the Inspector and all other participants in the examination process know who has made representations on the plan. The LPA should therefore ensure that they are able to lawfully process personal data held in relation to representations so it can be made available without names being redacted. If names are not made available, it is likely that it will not be possible for the plan to be examined. However, the Inspector does not need to know the address or other contact details of those who have made representations. Consequently, although these details will usually be provided by those making representations, they do not need to be made available/published on the examination website. However, the Programme Officer will need access to the contact details of those who made representations so they can contact participants and administer the examination. In some cases, in order to run virtual events or 'blended' events (i.e. a mix of in-person and virtual) by means of video or telephone conference, The Planning Inspectorate may need to know the email address

and/or telephone number of those making representations. An Agreement for the Supply of Services will be put in place setting out the steps the LPA and the Planning Inspectorate will take to help deliver an efficient examination. A data sharing agreement will also be signed by the Planning Inspectorate and LPA as part of a Service Level Agreement.”

- 5.4 Planning officers will work with the council’s data Protection Officer to ensure that data protection requirements can be met while still making available the necessary information as part of the examination of the plan.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 For Option A - the change in paragraph 3.16, to remove height guidance from the Local Plan, presents a potential risk on the soundness of the Local Plan. This could result in the requirement of additional consultation and evidence base.
- 6.2 The financial implications of this are not known at this stage and would be dependent on the specific additional consultation and evidence base requirements. Any additional costs would be funded from the Local Plan reserve, and if costs are expected to exceed this a growth bid would be required.
- 6.3 For option B - there are no financial implications emanating from this option. The cost of undertaking the consultation will be contained within existing budget provision.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The body of the report fully outlines the rationale behind the recommendations and details accurately the process that is required to be followed to commence the next stage of statutory consultation (known as Regulation 19 consultation) on the draft Local Plan before it is sent to the Secretary of State for public examination. The risks and benefits of not having/having an up-to-date Local Plan are fully outlined. The process of publishing the proposed submission version of the Tower Hamlets Local Plan 2038 is a statutory step and a decision is sought from the Mayor in Cabinet to take that step. Once published, the public will have a six-week period in which to comment on the proposals. Once the consultation period has concluded, officers will consider the results of the consultation. Section 4 deals with Equalities and highlights that the statutory requirements have been met. Fuller details may be found within the Integrated Impact Assessment in Appendix 3.

Option A – revised approach to tall buildings

- 7.2 For this option, the detail in paragraphs 3.16 - 3.21 seeks to remove height restrictions on Tall Building Zone B and five site allocations which was published in the Reg 18 Local Plan consultation. The detail may be found in proposed Policies PS2 and PS8.

- 7.3 There is potentially a significant risk that this change may impact upon the 'soundness' of the draft Local Plan, leaving it vulnerable to an Inspector concluding that it is not sound and requires changes ('modifications') which would then be subject to further consultation. The principal concerns are –
- A) Lack of evidence base for the proposed Reg 19 policy wording - the Reg 18 policy wording was predicated on an evidence-base and analysis of that evidence. The proposed Reg 19 policy wording is not underpinned by the same quality of evidence and would be vulnerable to a simple challenge along the lines of "where is your evidence to justify this policy?"
 - B) The Regulation 19 policy wording is, in the absence of an evidence base, not justified.
 - C) Other work that has been undertaken in the preparation of both the Reg 18 Local Plan and the Reg 19 version may need to be revisited and reviewed to ensure that the conclusion of this work remains pertinent and supportive of the proposed wording of the Reg 19 Local Plan. For example, a review of the Integrated Impact Assessment which is an exercise in checking how policies may impact social, economic and environmental factors in the borough ensuring that the Plan reduces and mitigates any potential negative effects is required.
 - D) There may be a "knock-on" effect on other planning considerations contained in the Reg 19 Local Plan, should the proposed Reg 19 policy wording be taken forward. There does not appear to be any evidence base addressing the impact of the proposed policy on highly significant issues such as infrastructure, the environment or townscape. This work in all likelihood will be required to be undertaken before the Reg 19 Plan will be considered 'sound'.
 - E) The newly drafted policy PS2 may not be in conformity with London Plan policies which may prompt objections from the GLA, particularly as the London Plan is the superior plan and LBTH's Local Plan should be prepared in accordance with that Plan.
 - F) The newly drafted policy PS2 is likely to fall foul of the council's commitment in its Statement of Community Involvement that policies will be evidence-based and that the initial Reg 18 stage may be repeated if the proposed Reg 18 wording is likely to substantially changed prior to the Reg 19 stage. The proposed change here is significant and ought properly to be consulted upon prior to being included in any reg 19 submissions.
- 7.4 There is a risk that should the Regulation 19 Plan proceed with newly proposed policy PS2 wording that it is likely to attract substantial objections, all of which will be forwarded to the Secretary of State for consideration at the public examination. The risk is that the Regulation 19 Plan may not pass the test of soundness (in particular, a lack of an evidence base for Policy PS2 means the policy may not be *justified*; potentially *inconsistent* with the London

Plan; and, arguably it is not *positively prepared* – Policy PS2 has been added at the last minute without undergoing any Regulation 18 consultation and without an evidence base).

Option B – unchanged approach to tall buildings

- 7.5 For this option - The body of the report fully outlines the rationale behind this option and details accurately the process that is required to be followed. The risks and benefits are fully outlined.

Meeting Gypsy and Traveller needs

- 7.6 The Report openly highlights potential conformity issues with policies surrounding Gypsy and Traveller pitches. The risks are adequately highlighted in the Report and provide sufficient guidance to the decision-maker to support the decision-making process.
- 7.7 Nevertheless, the council may choose to consult on the Regulation 19 Local Plan without undertaking further work. In addition to the issues highlighted above, this may delay the process as any Inspector appointed to examine the Local Plan may direct the council to undertake the additional work to gather the evidence in support of the proposed Policies and then consult upon them before any public examination of the Plan commences.
- 7.8 By way of a footnote, on 4 July 2024, the country voted for a new government. The new Labour administration has already signalled that housing is to be a priority and that the planning regime will see reform. The planning regime is therefore entering a period of transition. The legal comments reflect the position as at today's date. It might be that future changes to housing and planning policy would indeed support the intention of the newly worded policy PS2 as a visionary policy promoting housing provision.

Linked Reports, Appendices and Background Documents

Linked Report

- Cabinet Report, 25 October 2023, Tower Hamlets New Local Plan: Regulation 18 Consultation Draft
(<https://democracy.towerhamlets.gov.uk/documents/s225343/Tower%20Hamlets%20New%20Local%20Plan%20Regulation%2018%20Consultation%20Draft.pdf>)

Appendices

- Appendix 1A: Tower Hamlets Local Plan 2038 – Proposed Submission Version (Corresponding to Option A)
- Appendix 1B: Tower Hamlets Local Plan 2038 – Proposed Submission Version (Corresponding to Option B)
- Appendix 2: Local Plan Policies Map
- Appendix 3A: Integrated Impact Assessment (Corresponding to Option A)

- Appendix 3B: Integrated Impact Assessment (Corresponding to Option B)
- Appendix 4: Consultation Statement
- Appendix 5: List of evidence base documents to be published as part of consultation

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

- NONE

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London Borough of Tower Hamlets 100019288 2013

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Mayor's foreword

It is with great pleasure that I announce the production of a new draft Local Plan for the borough of Tower Hamlets. This is a critical step for our community at a time when we face some of the most significant challenges in our history. We need to respond to the cost-of-living crisis, ensure that we provide sufficient new homes and infrastructure to address the issue of overcrowding, particularly affecting our most vulnerable residents.

As the fastest growing local authority in the country, with the highest housing target and youngest average age, all within one of London's smallest geographical boundary areas (7.6 square miles), it is vital that we plan for sustainable development that is equitable and provides opportunities for future generations.

This Local Plan will provide a blueprint for the future of Tower Hamlets, enabling us to deliver new homes, infrastructure, employment opportunities, and support for our town centres while moving towards a cleaner, greener future. The new Local Plan aligns with our council's Strategic Plan and its priorities for investment in public services and improving the lives of our residents.

The process of creating the new Local Plan for Tower Hamlets began in January 2022 and has involved early engagement with our communities to gather views and opinions. This has given us invaluable insights into the hopes and aspirations of our residents for the future of our borough and what they would like to see included in a new Local Plan.

The ideas and ambitions submitted by our communities, alongside the preparation of robust evidence base documents, have informed the creation of this first draft of the Local Plan. It contains a policy framework and strategy designed to address the challenges and opportunities facing our borough and its people.

We remain committed to listening to our residents and stakeholders and encourage everyone to participate in the production of the Local Plan and share your thoughts. We welcome feedback during this consultation period where together, we can create a Local Plan that reflects the needs and aspirations of our communities and helps us build a brighter future for all in Tower Hamlets.

We have a unique opportunity to build a vibrant and successful future for Tower Hamlets that benefits all residents, regardless of background or circumstances. With the production of this new Local Plan, we are taking the lead in ensuring that we build our Borough to benefit present and future generations. Together, we can make Tower Hamlets a place where everyone can thrive.

ময়েরে ভূমিকা

অত্যাধিক আনন্দে সঙ্গী আমাটাওয়ার হ্যামলেটেস বরো-এর জন্য একটি নতুন খসড়া স্থানীয় পরিকল্পনা (লোকাল প্ল্যান) তৈরি ঘোষণা দিচ্ছি। এটি এমন একটি সময়ে আমাদের কমিউনিটিগুলির জন্য একটি গুরুত্বপূর্ণ পদক্ষেপে যখন আমরা আমাদের ইতিহাসে সবচেয়ে গুরুত্বপূর্ণ চ্যালেঞ্জগুলির মুখোমুখি হয়েছি। আমাদেরকে জীবনযাত্রার ব্যয়ের সংকটকে মোকাবিলা করতে হবে, নশিচিতি করতে হবে যে আমরা যেনো অভ্যর্থনা উভি তথা জায়গার তুলনায় অতিরিক্ত লোকজনকে বসবাসজনিত সমস্যা, বিশেষত যা আমাদের সবচেয়ে ভয়ঙ্কর আর ঝুঁকিপূর্ণ বাসনিন্দাদে প্রভাবিত করে, সমাধানের জন্য পর্যাাপ্ত নতুন বাড়ি এবং অবকাঠামো প্রদান করি।

লন্ডনের কল্পদ্রতম ভৌগোলিক সীমানা এলাকার (৭.৬ বর্গমাইল) মধ্যে সর্বোচ্চ আবাসন লক্ষ্যমাত্রা এবং সর্বকনিষ্ঠ গড় বয়সসহ দশেরে দ্রুততম কর্মবর্ধমান স্থানীয় কর্তৃক হিসাবে, এটি গুরুত্বপূর্ণ যে আমরা টেকসই উন্নয়নের জন্য যেনো এমন একটি পরিকল্পনা করি যা ন্যায়সঙ্গত এবং ভবিষ্যৎ প্রজন্মগুলির জন্য সুযোগ প্রদান করে।

এই স্থানীয় পরিকল্পনা টাওয়ার হ্যামলেটেসেরে ভবিষ্যতের জন্য একটি চূড়ান্ত পরিকল্পনা প্রদান করবে, যা আমাদের পরচিহ্নন, সবুজ ভবিষ্যতের দিকে অগ্রসর হওয়ার সময় আমাদের শহর কেন্দ্রগুলির জন্য নতুন বাড়ি, অবকাঠামো, কর্মসংস্থানের সুযোগ এবং সহায়তা যোগাতে সক্ষম করবে। নতুন স্থানীয় পরিকল্পনা আমাদের কাউন্সিলেরে কৌশলগত পরিকল্পনা এবং পাবলিক সার্ভিসগুলিতে বিনিয়োগ এবং আমাদের বাসনিন্দাদে জীবনযাত্রার উন্নতির জন্য এর অগ্রাধিকারগুলির সাথে সামঞ্জস্যপূর্ণ।

টাওয়ার হ্যামলেটেসেরে জন্য নতুন স্থানীয় পরিকল্পনা তৈরি প্রক্রিয়াটি ২০২২ সনের জানুয়ারী মাসে শুরু হয়েছিল এবং তা দুইটি ভিডিও এবং মতামত সংগ্রহেরে জন্য আমাদের কমিউনিটিগুলির সাথে প্রাথমিক সম্পৃক্ততাকে জড়িত করেছিল। এটি আমাদের বরোর ভবিষ্যতের জন্য আমাদের বাসনিন্দাদে আশা এবং আকাঙ্ক্ষাসমূহ এবং তারা একটি নতুন স্থানীয় পরিকল্পনায় কী অন্তর্ভুক্ত দিতে চান সে সম্পর্কে অমূল্য অন্তর্দৃষ্টি দিয়েছে।

আমাদের কমিউনিটিগুলির দ্বারা জমা দেওয়া ধারণা এবং উচ্চাকাঙ্ক্ষাসমূহ, শক্তিশালী

প্রমাণভিত্তিক নথিপত্র প্রস্তুত করার পাশাপাশি, স্থানীয় পরিকল্পনার এই প্রথম খসড়া তৈরি বিষয়ে তথ্য প্রদান করেছে। এতে একটি নীতি কাঠামো এবং কৌশল রয়েছে যা আমাদের বরো এবং এর জনগণের মুখোমুখি চ্যালেঞ্জ এবং সুযোগগুলি মোকাবিলা করার জন্য উপযোগী করে সাজানো হয়েছে।

আমরা আমাদের বাসনিন্দাদে এবং স্ট্রাইকহোল্ডারদের (শরিকানদের) কথা শুনতে প্রত্যাশিতবিশিষ্ট এবং সবাইকে স্থানীয় পরিকল্পনা তৈরিতে অংশ নিতে এবং আপনার চিন্তাভাবনা ভাগ করে নিতে উত্সাহিত করি। আমরা এই সলাপরামর্শ তথা কনসালটেশনের সময়কালে সাড়ামূলক মতামতকে স্বাগত জানাই যেখানে একসাথে, আমরা একটি স্থানীয় পরিকল্পনা তৈরি করতে পারি যা আমাদের কমিউনিটিগুলির চাহিদা এবং আকাঙ্ক্ষাগুলিকে প্রত্যাশিত করে এবং টাওয়ার হ্যামলেটেসে সকলের জন্য একটি উজ্জ্বল ভবিষ্যৎ গড়ে তুলতে সহায়তা করে।

টাওয়ার হ্যামলেটেসেরে জন্য একটি প্রাণবন্ত এবং সফল ভবিষ্যত গড়ে তোলার জন্য আমাদের এমন একটি অনন্য সুযোগ রয়েছে যা পটভূমি বা পরিস্থিতি নির্বিশেষে সকল বাসনিন্দাদে উপকৃত করে। এই নতুন স্থানীয় পরিকল্পনা তৈরি মাধ্যমে, আমরা বর্তমান এবং ভবিষ্যৎ প্রজন্মদের উপকারেরে জন্য আমাদের বরো গঠনে নতুন দিচ্ছি। একসাথে, আমরা টাওয়ার হ্যামলেটেসকে এমন একটি জায়গায় পরিণত করতে পারি যেখানে সবাই সাফল্য আর সমৃদ্ধ লাভ করতে পারে।



Lutfur Rahman

Executive Mayor of Tower Hamlets



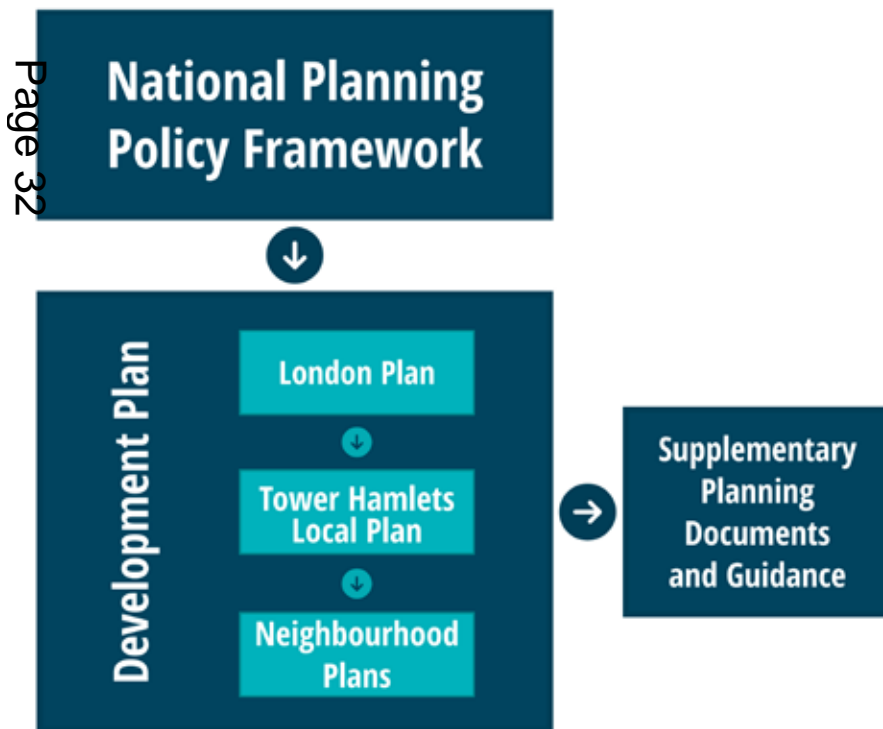


Introduction

This is the first draft version of a new Local Plan for Tower Hamlets that is being consulted upon in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

1. What is the Local Plan?

Figure 1: The Local Plan in relation to other planning documents



1.1 A Local Plan is a spatial strategy that sets out a vision and objectives, planning policies, and site allocations that respond to the challenges that local communities are facing and promote sustainable development in the borough. It is a planning policy framework that guides and manages development in the borough over a period of 10-15 years.

1.2 A Local Plan will be prepared by a Local Planning Authority and must be developed in line with planning policy requirements set out by national and regional government as well as in consultation with the local community.

1.3 An up-to-date local plan with a clear vision, objectives, and planning policies will ensure the most appropriate development decisions and address the needs and opportunities of an area. In practice, the Local Plan will provide a guide as to what can be built where, how infrastructure investments should be shaped, and determining the future development pattern for Tower Hamlets.

1.4 The Local Plan, together with the London Plan and Neighbourhood Plans, will form the statutory Development Plan framework for Tower Hamlets and be used to assess all planning applications.

1.5 The process of developing a Local Plan starts with engaging the community which the council commenced in January 2023. Reflecting on the submissions received through early engagement a Regulation 18 draft Local Plan was consulted upon in late 2023. The updated version of the Local Plan which considers submissions received at Regulation 18 is the Regulation 19 Local Plan. This updated version of the document is submitted to the Secretary of State under Regulation 19, alongside any final comments or 'representations'. If the Secretary of State deems the document to meet the basic legal requirements, an Independent Inspector will be appointed to undertake an examination in public of the draft Local Plan.

Figure 2: Key stages of the plan making process, highlighting the current stage of production



2. Why is a new Local Plan being produced?

2.1 All Local Planning Authorities are required by the National Planning Policy Framework to have an up-to-date Local Plan. Without an up-to-date Local Plan, Tower Hamlets would see a reduced ability to apply local discretion on deciding planning applications. A new Local Plan will ensure a better understanding of current needs, address known and emerging challenges and make the most of the borough's unique assets and opportunities.

2.2 The council's current Local Plan "Managing growth and sharing the benefits", was adopted in 2020. It provides the planning policy framework for the borough up to 2031. However, specific objectives, policies and guidance contained in, and informing the Plan, may be considered outdated, particularly due to changes in national and regional guidance, in particular the London Plan (2021), new Levelling Up & Regeneration Bill and the draft consultation National Planning Policy Framework.

2.3 Of particular importance is ensuring that a new Local Plan for the borough best responds to the needs and aspirations of the local community, responding to the impacts from the COVID-19 pandemic and cost of living pressures, and providing the best opportunity for local residents to thrive in Tower Hamlets.

2.4 A new Local Plan will also need to consider and plan for parts of the borough where the planning powers are currently held by the London Legacy Development Corporation (LLDC) planning authority. This includes the areas of Fish Island, Hackney Wick and Bromley by Bow. The planning powers of this area will be handed back to the



relevant boroughs, including Tower Hamlets, by December 2024 as agreed by the Mayor of London.

2.5 Cumulatively, these trends, challenges, and opportunities will have a significant impact on the borough's housing, employment, town centres, infrastructure, and environment for the next 15 years. As a result, the council has committed to the preparation of a new Local Plan as a priority to respond to these changes. The council will continue to take a leadership role in planning positively for the borough and ensuring equality of opportunity.

3. What are the statutory requirements in developing a Local Plan?

3.1 The draft Tower Hamlets Local Plan has been prepared within the wider planning framework which provides the context for the document and sets requirements for the plan making process, the structure and contents of local plans and how a vision, policies and site allocations should be implemented.

Legislative framework:

3.2 The Planning and Compulsory Purchase Act 2004 is the primary legislative act that provides the basis for the plan-led system in England. It is supported by other legislative instruments, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the council to prepare and adopt the Local Plan and other supporting documents.

National guidance:

3.3 The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework (NPPF) (2021). This sets out the Government's planning policies for England and how they should be applied. It includes requirements for the preparation of local plans and is also a material consideration in the decision-making process for planning applications.

3.4 Local plans are independently examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound'. Plans are 'sound' if they are:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

3.5 The NPPF is supported by National Planning Practice Guidance (NPPG) which contains further detail on the plan-led system, decision-making, consultation, appraisals, and process-related requirements.

Regional framework:

3.6 The Local Plan must also be in general conformity with regional planning policies. For Tower Hamlets and all Greater London Boroughs, this is provided within the London Plan, which is produced by the Mayor of London and is referred to as the 'Spatial Development Strategy'. This hierarchy ensures a considered, balanced, and consistent approach to planning across all boroughs. The London Plan forms part of the Tower Hamlets development plan, meaning it must be taken into account in planning decisions. The London Mayor also prepares London Plan Guidance (LPG) documents that support implementation of the London Plan.

4. What informs the development of the Local Plan?

Evidence base

4.1 To support policies and site requirements, robust and justifiable evidence must be produced. This will ensure that the Local Plan is considered sound and best represents the community's interest. Evidence base documents will consider market trends, population projections, on-site realities, expert input, and a range of quantitative and qualitative data to provide the best available information. The evidence has been prepared by either the council or other organisations including government bodies and comprises research studies, technical data, strategies, site masterplans and other technical information to cover the wide range of local plan policy areas. The evidence has also incorporated findings from the 2021 Census data that has been released to date. Growth and population projections have been informed by the Greater London Authority's updates and releases.

4.2 A series of evidence base documents have been completed and these will be listed throughout the document for each relevant section and policy area. Completed documents are available on the council's 'Let's Talk' consultation platform.



Integrated Impact Assessment

4.3 The preparation of a new local plan must be continuously assessed in relation to potential social, economic, and environmental impacts. A series of impact assessments have been conducted throughout the Local Plan process to ensure impacts are mitigated, avoided and provide alternative options. These assessments have considered sustainability objectives, health, equalities, habitats regulation, and community safety. All of these assessments will be continued through the whole Local Plan process and will be updated in later consultation stages. An Integrated Impact Assessment that has appraised this Regulation 19 draft new Local Plan is available on the council's 'Let's Talk' consultation platform.

Viability

4.4 Local plans must be assessed in relation to their economic/ financial viability as to whether they are deliverable. This includes assessing the policies and site requirements provided within a local plan and considering how feasible it is for development opportunities to deliver what is being asked.

Duty to cooperate

4.5 The Localism Act (2011), subsequent regulations and the NPPF place a duty on local planning authorities to cooperate with neighbouring boroughs and other statutory bodies when preparing, or supporting the preparation of policies which address strategic matters. Tower Hamlets has and will continue to work positively with neighbouring boroughs and other relevant public bodies to identify and address issues of strategic importance during the preparation and implementation of the new Local Plan.

Consultation and engagement

4.6 There will be three main engagement/consultation stages as part of the Local Plan process. These stages provide an opportunity for all community members and stakeholders to provide feedback on what a new local plan should include, whether initial ideas and concepts are right, whether the themes are consistent with community aspirations or if anything has been missed. All feedback will be reviewed in detail and used to inform the next stages of the Local Plan process.

5. Consultation and engagement

5.1 The draft Local Plan has been developed together with all key stakeholders including with the Mayor of Tower Hamlets, elected councillors, local residents, neighbourhood forums, community groups, landowners, developers, and statutory bodies.

5.2 Early engagement on the new Local Plan was a non-statutory consultation event, running from Wednesday 25 January 2023 until Wednesday 8 March 2023. It consisted of:

- Digital engagement materials:
 - Details on the Tower Hamlets website;
 - Let's Talk Tower Hamlets consultation page;
 - ArcGIS StoryMap platform;
 - PDF engagement documents;
 - Google Forms survey;
 - Word document version of survey; and
 - Social media.
- Emails to mailing list and stakeholders, including residents, consultees, and councillors.
- Public events:
 - 3 webinars;
 - 2 online drop-in sessions;
 - 2 in-person drop-in sessions; and
 - In-person public engagement sessions.

- Flyers and posters at Idea Stores and libraries; flyers handed out on streets.

5.3 Following the early engagement, consultation in accordance with Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012, was undertaken for a six week period from 6th November to 18th December 2023. The purpose of the Regulation 18 consultation was to gain feedback on the new draft policies, including their suitability and potential impacts. This engagement process included:

- Digital engagement methods:
 - A dedicated webpage in the council's consultation portal;
 - A mapping and survey system called StoryMaps;
 - Online drop-in and webinar events.
- Emails to mailing list and stakeholders, including residents, statutory consultees, and councillors.
- Public events:
 - Six in person presentations covering different themes and geographic areas;
 - Drop-in sessions at the Town Hall; and,
 - Attendance at meetings of community organisations.

5.4 The feedback and input received from the above processes significantly contributed to the preparation of this draft Local Plan. Early engagement and Regulation 18 submissions both came from a wide range of respondents. These included key stakeholders in the borough, both those listed under the specific and general consultation bodies in the council's statement of community involvement and the wider public.

There was significant involvement from residents and individuals who live and/or work in the borough, producing a diverse sample of views and experiences of Tower Hamlets.

5.5 A summary of the early engagement for the new Local Plan can be found at <https://talk.towerhamlets.gov.uk/local-plan>.

5.6 A summary of the Regulation 18 consultation for the new Local Plan can be found [here](#).

6. How to get involved in the Regulation 19 stage of the Local Plan process

6.1 The Draft Local Plan has been published by Tower Hamlets Council Local Planning Authority (LPA) in order for responses to be made on it before it is submitted for examination by a Planning Inspector.

6.2 In complying with the stages and requirements for producing a Local Plan, as prescribed by national policy, legislation, and through the council's own Statement of Community Involvement, the council will ensure a comprehensive and robust Regulation 19 consultation which looks to test the soundness of the proposed submission document against the four criteria set out in national guidance.

6.3 At this stage of the plan making process, in accordance with national guidance, it is requested that consultation responses focus on legal and procedural compliance, mainly the soundness of the Draft

Local Plan and the duty to cooperate. There are four tests of soundness which require the Draft Local Plan to be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

6.4 All relevant information relating to this stage of consultation, including the Draft Local Plan, supporting documents and a model representation form can be found on the council's website. Hard copies of the Local Plan and the model representation form will also be available at the Town Hall and Idea Stores and libraries across the borough for inspection.

6.5 You can review the Draft Local Plan to understand its contents and supporting evidence base by:

- Visiting the dedicated Let's Talk page ([insert link](#));
- Using our interactive StoryMap ([insert link](#));
- Speaking to officers of the council, visiting the Town Hall, libraries, or Idea Stores; and,
- Attending an in-person or online event;

6.6 If you wish to make a response seeking a modification the Local Plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria above. You can make a formal response on the soundness of the Draft Local Plan by:

- Completing and submitting response form on our Let's Talk page;
- Submitting a response to localplan@towerhamlets.gov.uk; and,
- Submitting a written response to the Plan Making Team, Housing and Regeneration, Tower Hamlets Town Hall, 160 Whitechapel Road, London, E1 1BJ

6.7 Your representation should be supported by evidence wherever relevant. It will be helpful if you also say precisely how you think the plan should be modified. To ensure an effective examination, it is important that the inspector and all other participants in the examination process are able to know who has made representations on the plan. Therefore, when completing the response form it is vital you provide your name and contact details.

6.8 You can help by:

- Forwarding information of this project to people, groups, or organisations you think may be interested;
- Making a post on social media to help spread the word; and
- Sharing feedback on how we're consulting on this project.

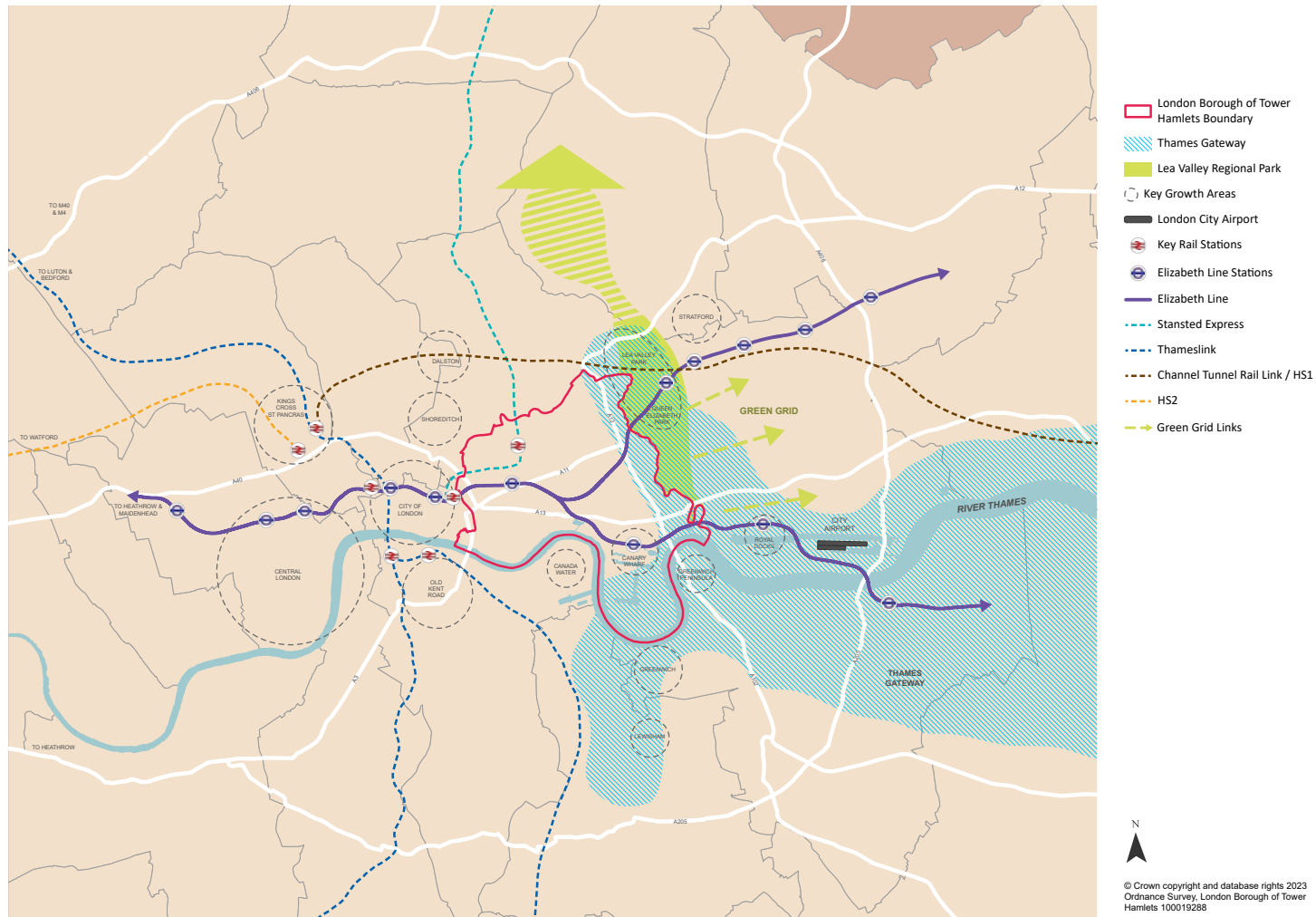
7. Next steps

7.1 Following the Regulation 19 stage and reflection on the contents of representations received the Draft Local Plan will be submitted to the Secretary of State for an Independent Examination in Public, along with all representations received. The Secretary of State will appoint a Planning Inspector who will consider all responses received at the Regulation 19 stage, examine the Draft Local Plan and decide whether it is sound and legally compliant. The Inspector may require modifications to the Local Plan and will decide whether or not to recommend adoption of the Local Plan.



Setting the Scene

Figure 3: Strategic location map, showing Tower Hamlets in the wider context.



8. Setting the scene

8.1 This chapter provides an overview of Tower Hamlets, its people, economy, housing profile, indicators of deprivation, built form, environment, and town centres. It highlights how the borough is a microcosm of London, having the fastest population growth in the country and having always been a gateway for people of all backgrounds to live, work, and visit the borough.

8.2 Tower Hamlets is a dynamic and exciting borough with a wealth of opportunities for businesses, residents, and visitors alike. With its diverse population, rich history, and thriving economy, Tower Hamlets truly is a unique and exciting location to live, work, and visit.

History

8.3 Tower Hamlets is a borough with a rich and dynamic history, with evidence of Roman settlements and Viking invasions. The 19th century marked a pivotal moment for the borough as it became a prominent hub for shipping and manufacturing industries. However, the area suffered extensive damage during World War II, leading to significant regeneration and the establishment of many migrant communities. Encompassing much of the traditional East End of London, Tower Hamlets has emerged as a focal point for London and the UK, strategically located within the wider south-east region of England.

Context

8.4 Covering approximately 7.63 square miles, Tower Hamlets shares borders with several London boroughs, including the City of London to the west, Hackney to the north, and Newham to the east, as well as being bounded by the river Thames to the south. Neighbouring areas across the river include Lewisham, Southwark, and the Royal Borough of Greenwich. Tower Hamlets is renowned for its diversity and multiculturalism, with a vibrant cultural scene and numerous historical landmarks, including the iconic Tower of London and Tower Bridge.

8.5 Part of the borough (Fish Island, Hackney Wick, and Bromley-by-Bow) currently falls within the boundary of the LLDC, the local planning authority responsible for coordinating the growth and regeneration of the Queen Elizabeth Olympic Park and surrounding areas as part of the 2012 London Olympic Games legacy. The planning powers for this area will be passed back to LBTH by the end of 2024.

8.6 Tower Hamlets connectivity has been enhanced and the borough has been made even more attractive for businesses and residents alike, with the borough's transportation network receiving a significant boost with the long-awaited arrival of the Elizabeth line, with stations at Whitechapel and Canary Wharf.

Figure 4: Context map of the borough



People

8.7 From 2011 to 2021, the population of Tower Hamlets increased by 22.1% from 254,100 to 310,300. This marks a significant proportional increase and represents the fastest population growth of any local authority in England. This population increase together with the overall size of the borough has Tower Hamlets being recorded as the most densely populated local authority area in England with 15,695 residents per km², compared to the national average of 424 per km².

8.8 The borough has the youngest population profile of any local authority area across England where the average age sits at 30 years. Across the country, the overall average sits at 40 years. The number of people in Tower Hamlets aged 35 to 49 years rose by around 21,000 (an increase of 42.8%), while the number of residents between 75 and 84 years fell by just under 600 (10.5% decrease).

8.9 The rich, ethnic diversity of the Tower Hamlets population has continued with the 2021 Census data showing:

- The Bangladeshi population remains by far the largest in England by way of proportion (34.6%) and overall size (107,333).
- At 22.9% the White British population in Tower Hamlets is the fourth smallest in England and Wales behind Newham, Brent and Harrow.
- In 2021 there were 45,187 White Other residents in Tower Hamlets; 14.6% of the overall local population, a significant increase compared to 2011.
- In 2021, 6,180 residents identified as Somali or Somalilander, this is 2% of the overall population.

- The Black African population has increased; 5% of residents of Tower Hamlets identified as Black African which, at 5% of the local population is double the proportion of England and Wales as a whole (2.5%) but lower than the rate in London (7.9%).
- The local Chinese population in Tower Hamlets (3.3%) is the third highest proportion in England and Wales, behind City of London and Cambridge.
- Tower Hamlets has the fourth largest Roma population in England and Wales after Brent, Sheffield, and Newham (2,225 people identified as Roma in Tower Hamlets).

8.10 In 2021, 39.9% of people in Tower Hamlets described themselves as Muslim (up from 38.0%), while 22.3% described themselves as Christian (down from 29.8% the decade before). In 2021, 26.6% of Tower Hamlets residents reported having "No religion", up from 21.0% in 2011. The rise of 5.6 percentage points was the largest increase of all broad religious groups in Tower Hamlets.

8.11 73% of residents in Tower Hamlets reported that English is their main spoken language and an additional 20.7% of residents stated that, whilst it is not their main language, they can speak English well or very well. 6.2% of residents don't speak English well or at all. After English, Bengali is the most commonly spoken language in Tower Hamlets (11%) then Italian (2.2%) and Spanish (1.7%).



Deprivation and inequality

8.12 Tower Hamlets remains a borough of extremes and contrasts. Deprivation and poverty across the population is widespread. While there are pockets of affluence in locations proximate to the City Fringe, River Thames and Canary Wharf, there remains a significant disparity across a range of indicators related to education, overcrowding, income, and employment.

8.13 The council conducted a poverty review between March to June 2021. This review found that in 2019/20, 28 per cent of children in Tower Hamlets were living in a low-income family. Once housing costs are considered, 56% of children in Tower Hamlets were living in a low-income family - the highest level of child poverty in the England. 44% of older people in Tower Hamlets live in low-income households - the highest proportion in England. In 2018/19, 1.21% of Tower Hamlets households were estimated to be destitute. Tower Hamlets is in the 20 local areas in the country with the highest rates of destitution.

8.14 The 2022 local area statistics revealed that 15,385 (26.7%) children in Tower Hamlets were living in relative low-income families and 12,522

8.15 (21.8%) children in Tower Hamlets were living in absolute low-income families before housing costs - this is the second highest proportion among London Boroughs after the City of London (The City of London has a significantly smaller population size than any other local authority area given its location, commercial focus, and geographical area). These indicators of deprivation and inequality are contributed to by a number of factors, including:

- more families in Tower Hamlets have nobody in work than average, despite a decline in unemployment in recent years;
- a growing number of working families are on a low income - more than 3 in 4 children in poverty are in a family where at least one person works;
- the cost of living is high in the borough, particularly the cost of housing; and
- changes to the social security system mean that many people cannot afford essentials - larger families and lone parents with dependent children have been particularly affected.



Housing

8.16 Tower Hamlets plays an integral role in the strategic regeneration and development of Greater London, providing homes for the wider city, continually being measured against the highest housing targets across all London boroughs.

8.17 According to the March 2021 Census, Tower Hamlets had a total of 120,539 households. The majority (81%) of households in the borough live in purpose-built flats, the second highest proportion in England and Wales after the City of London and twice the proportion in the London region. In terms of ownership, there was a slight decrease in the number

of owner-occupiers from 24.2% in 2011 to 23.1% in 2021. This is the lowest proportion of owner-occupiers of any area in England and Wales.

8.18 Of the households in Tower Hamlets, 31.5% had one bedroom, 39.9% had two bedrooms, 20.0% had three bedrooms, and 8.6% had four or more bedrooms. Since 2011, the largest increase in households came from four or more-bedroom households (28% increase) and one-bedroom households (26% increase), with slightly smaller increases in two-bedroom households (15%) and three-bedroom households (17%).

8.19 There has been a decrease in social renting households from 39.6% in 2011 to 35.9% in 2021, with 13.9% of households (16,697) renting from the local authority. On the other hand, there has been a rise in private renting from 32.6% in 2011 to 38.2% in 2021, making Tower Hamlets the 5th highest area for households renting privately in England and Wales in 2021.

8.20 Regarding overcrowding, 15.8% of households (19,130 households) were considered overcrowded based on the measure of having too few bedrooms. This was slightly lower than in 2011 when it was 16.4%. However, Tower Hamlets still had the fourth-highest rate of any area in England and Wales after Newham, Barking & Dagenham, and Brent.

8.21 Tower Hamlets has consistently delivered more homes than any borough within London, with the period between 2012-2021 showing a total of 21,097 dwellings being delivered. However, the need and demand for new homes remains significant - as of April 2022, there were 21,840 households on the council's Common Housing Register, providing a measure of the affordable housing need within the borough.

8.22 The overall median price for a property within Tower Hamlets across all types was £525,000 in September 2022 whilst the overall median rent across all bedroom types was £1,650 a month.



Built form

8.23 Tower Hamlets is made up of 24 places, each containing unique characteristics that shape and define the borough and that have coalesced over time. Much of the borough has been developed at a modest scale with many neighbourhoods composed of streets of terraced properties dating from the 19th century. Located alongside the River Thames, the economy of much of the borough depended on this watercourse and thriving docks characterised the area until the middle of the last century. The decline of the docks has brought significant change and regeneration to the borough. The former docklands have changed from largely working environments to provide new residential neighbourhoods for the borough's growing community. Many have been developed at high densities and including clusters of tall buildings that have transformed the borough's skyline.

8.24 Tower Hamlets contains substantial areas of historic and architectural interest, including 58 conservation areas (which cover around 30% of its total area) and over 2,000 listed buildings, with great variation in character and size. Some of these buildings are landmarks of national and international importance, including the Tower of London (a UNESCO world heritage site) and Christ Church, Spitalfields. Other notable historic buildings include the medieval parish church of St Dunstan (which predates the Tower of London) and the high-tech, former Financial Times Print Works (constructed in the late 1980s). One Canada Square is a landmark skyscraper located within the Canary Wharf Estate, standing at 235m above ground level and was the tallest building in the United Kingdom when constructed in 1990 and is the current third tallest building. The building played a significant role in the shifting of London's financial centre from the traditional Square Mile to

the historic docklands, east of the City of London. One Canada Square is a symbol of modern, progressive London and forms the backdrop to the dramatic skyline of Canary Wharf, which is visible over a wide area and globally recognised as an iconic London landmark.

8.25 Large parts of the borough, predominantly towards the Isle of Dogs, Lower Lea Valley, Olympic Legacy and City Fringe areas have undergone significant change and regeneration within our inner-city communities. In recent years there has been an increase in the number of tall buildings, causing notable changes to the borough's skyline. For a number of years, Tower Hamlets has had the largest pipeline of tall buildings of any local authority area in the United Kingdom (including consented and proposed developments).

8.26 Tall building clusters have also established in neighbouring boroughs and are visible from vantage points within Tower Hamlets. These include Dalston in the London Borough of Hackney, Stratford and Canning Town in the London Borough of Newham, the Greenwich Peninsula in the Royal Borough of Greenwich, Canada Water in the London Borough of Southwark and Lewisham town centre in the London Borough of Lewisham. Further investment and growth is taking place in the Lower Lea Valley, around the Royal London Hospital and Queen Mary University and at the former London Dock in Wapping.

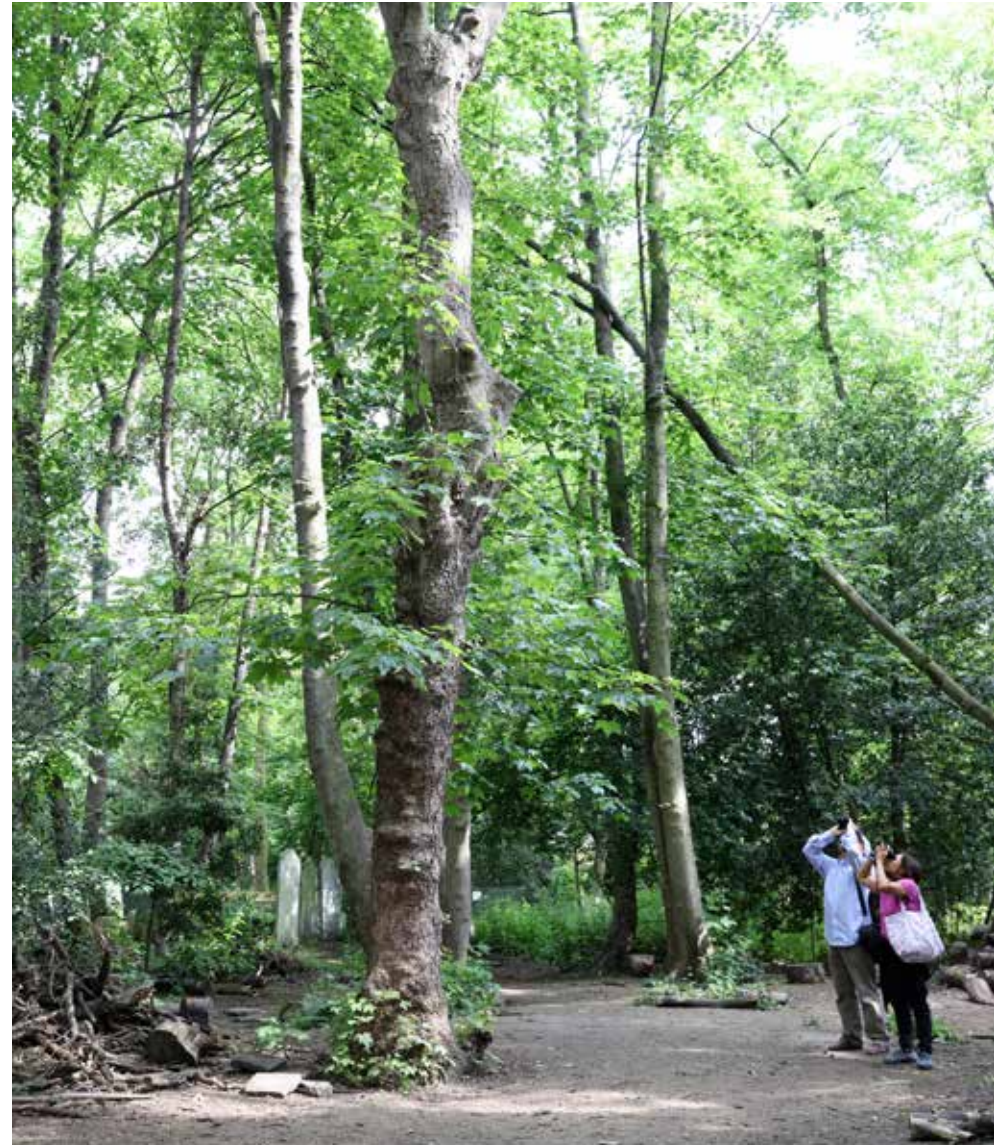


Environment and open spaces

8.27 Tower Hamlets is home to over 200 parks and open spaces, with more than 170 of these accessible to the public, covering an area of approximately 260.58 hectares. Of these spaces, 5 are Registered Historic Parks and Gardens with listed status ranging between Grade II* to Grade II, 16 are protected London Squares, and 52 are sites of historic interest. While larger urban parks, including Victoria Park, Mudchute Park, and Mile End Park, play a significant role in attracting visitors from across London, the overall provision of publicly accessible open space in the borough is lower than that of other inner London boroughs with similar characteristics and falls below national standards. Furthermore, the borough's topography and urban form make it susceptible to the effects of climate change, including flooding and the urban heat island effect.

8.28 One of Tower Hamlets' greatest natural assets is its access to the river Thames and the network of inland waterways that cut through the borough, which includes canals, reservoirs, and former working docks. The borough is also home to a rich biodiversity of rare and protected species, such as the black poplar (Britain's rarest native timber tree), the nationally scarce brown-banded carder bee, the streaked bombardier beetle (recently recorded from only four UK sites), bats, great crested newts, and the black redstart.

8.29 In March 2019, Tower Hamlets Council committed to becoming a net zero carbon council by 2025 and a net zero carbon borough by 2045 or sooner, as part of its efforts to play a role in addressing the climate emergency and moving towards a cleaner and greener future.



Business and the economy

8.30 Tower Hamlets has a vibrant economy which has played a significant role in supporting the vitality of the borough and its people, as well as making a healthy contribution to the overall economic growth of Greater London and the wider national economy.

8.31 Tower Hamlets' vibrant local economy can be attributed to the strong and unique presence of our markets which are mostly situated in our thriving local town centres. The local economy is also made up by many local retail businesses and micro and local independent businesses. This provides a unique character to the borough, creating a strong sense of community and diversity.

8.32 Tower Hamlets is also home to London's second financial district at Canary Wharf, which plays host to several major businesses, including financial services companies, law firms, and multinational corporations. It has also become a hub for the emerging tech industry and life sciences, with several technology and biotech start-ups choosing to set up base in the area.

8.33 The borough's creative industries, particularly in film, television, and music production, continue to thrive, with Tower Hamlets providing an ideal location for studios and production companies. Additionally, the area is home to a range of universities, colleges, and schools, making it a popular destination for students.

8.34 Tower Hamlets' close network of commercial areas, excellent transport links, and location on the edge of the City make it a popular choice for businesses and individuals to locate in the borough as well as have access to the wider London market if needed.



Employment

8.35 There were an estimated 323,000 jobs in Tower Hamlets in 2021, a number which is expected to increase to 439,000 by 2026. Average weekly earnings in Tower Hamlets are significantly higher than the London and UK averages, with the average full-time worker in the borough earning £797.30/week in 2020. Despite this strong economic growth, there is no correlation between the economic growth of the borough and better living standards for some people. A significant portion of residents are living next to a thriving economy unable to reap its benefits. Fewer than 15% of jobs in the borough are taken by borough residents, and Tower Hamlets has the highest worklessness rate in London and 14% of residents have no qualifications - twice the London average. Persistent inequality requires further intervention in order for residents to access the benefits from the economic development. The skills of many residents are ill suited to the new jobs that are being created.

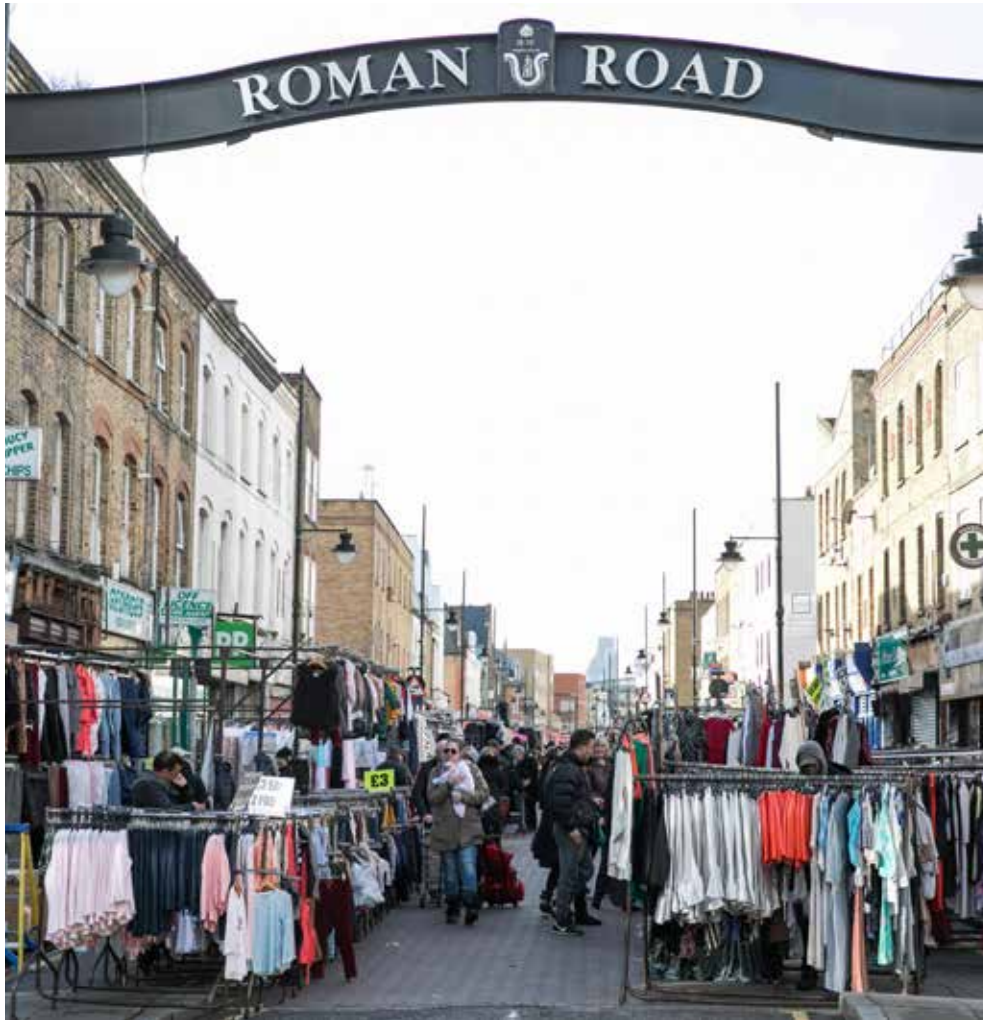
8.36 While the economic profile of Tower Hamlets is dominated by some of the world's largest financial and professional service organisations with 40% of all jobs within Tower Hamlets within this industry (Financial and Professional Services), primarily influenced by Canary Wharf and the City Fringe - the borough has a wide range of local businesses including small family companies, creatives, start-ups, light manufacturers, and small-to-medium sized enterprises (SMEs). The vast majority of businesses based in Tower Hamlets are small businesses with 98% of enterprises employing fewer than 50 people and nine in ten are 'micro' businesses which employ fewer than 10 people. 7% of enterprises are sole traders. Only 0.5% of the borough's enterprises employ 250 employees or more.

8.37 Emerging creative, digital, and ICT hubs can be found in areas such as Bethnal Green, Brick Lane, Cambridge Heath, and Whitechapel. The northern and eastern parts of the borough are more industrial in nature, with recent growth in the creative sectors in places like Bow and Fish Island.

8.38 Tower Hamlets has bucked the trend seen across England, with the 2021 census showing an increase in overall employment for people aged 16 years and over (excluding full-time students). The percentage of employed individuals in the borough rose from 55.7% in 2011 to 58.7% in 2021, while across England it decreased from 56.5% to 55.7%. Meanwhile, the percentage of people aged 16 years and over who were unemployed (excluding full-time students) in Tower Hamlets fell from 6.5% to 4.7%, with the percentage of economically inactive individuals aged 16 years and over who were retired decreasing from 7.6% to 5.8%.

8.39 Over the period 2023-2038, Tower Hamlets is expected to see demand for an additional 283,000sqm of office floorspace and 77,000 sqm of industrial floorspace.

8.40 It is important to note that the Census 2021 data was collected during the COVID-19 pandemic, a time of rapid and unprecedented change. The national lockdown, associated guidance and furlough measures may have had an impact on the labour market and our ability to measure it.



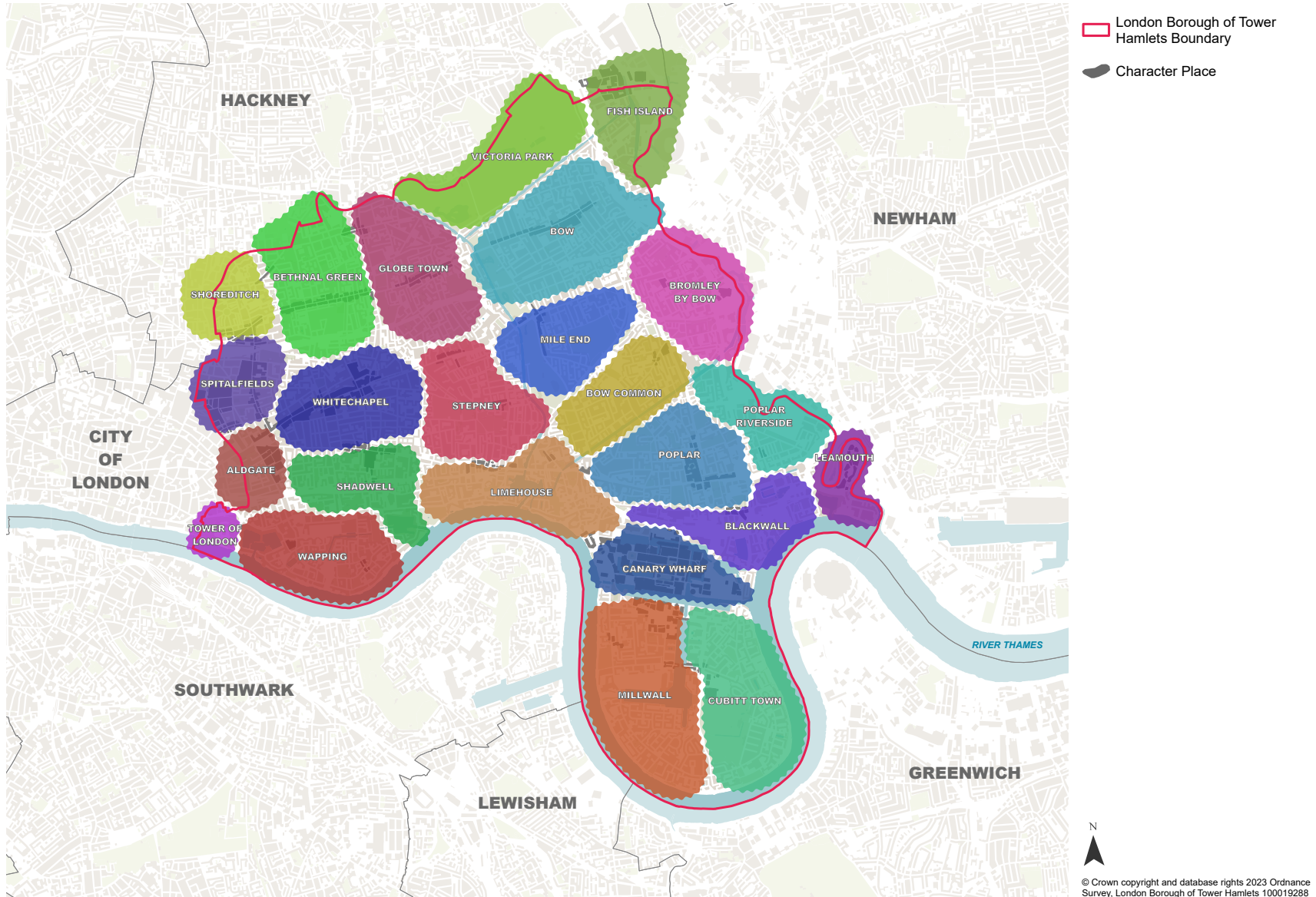
Town centres

8.41 Tower Hamlets is a diverse borough that contains a variety of town centres, each contributing to the vitality and vibrancy of the area. The borough contains parts of the London Plan's Central Activities Zone (CAZ), as well as one metropolitan centre in Canary Wharf, eight district centres, three specialist centres, three CAZ centres, 16 neighbourhood centres, and 14 neighbourhood parades.

8.42 The town centres serve a vital function in the wider community, with each offering a diverse and varied selection of amenities. The bustling markets in Whitechapel, Crisp Street, Roman Road, Columbia Road, and Petticoat Lane provide a unique shopping experience. Meanwhile, Spitalfields, Redchurch Street, Brick Lane, Canary Wharf, Hackney Wick, Whitechapel, Cambridge Heath, Columbia Road, and Bethnal Green offer a thriving night-time economy. Canary Wharf is home to a range of retail, leisure, and community offers, and the borough also has a growing arts and cultural scene, which includes galleries, museums, cinemas, theatres, studios, and drinking establishments.

8.43 These town centres play an important role in the wider strategic function of London and contribute significantly to the area's international appeal. In addition, the borough's community facilities, including libraries, leisure centres, community hubs, idea stores, places of worship, and the new Town Hall in Whitechapel, are highly valued by Tower Hamlets residents.

Figure 5: 24 Character places





Vision and objectives



**Empowering the next generation:
building a brighter future for Tower
Hamlets, together.**

9. Our vision for Tower Hamlets

9.1 Our vision for Tower Hamlets is to build a brighter future, to empower the next generation, and to promote a multicultural and diverse community that thrives within mixed, cohesive, and inclusive neighbourhoods. The council will prioritise inclusivity for people of all ethnicities, faiths, genders and sexual orientation, walks of life, designing our places to ensure that people are put first within the highest quality environments that meet the needs and ambitions of all our communities.

9.2 The council will strive to address overcrowding in the borough and meet the range of housing needs of our communities by delivering a significant amount of high-quality new homes. The issues caused by overcrowding including poorer health and educational outcomes, increased impacts on mental health and greater incidences of depression and anxiety will be mitigated with the focus on an increased capacity for housing. We will consider a mix of housing products, types, tenures, layout, and size to best match the borough's population, with a focus on affordable and social housing, particularly family homes that can meet the needs of our overcrowded residents. We will seek to focus on the delivery of affordable and social housing through a 50% overall target and a 40% on-site development requirement to tackle the overcrowding and housing crisis. The borough's Tall Building Zones (TBZ) will be expanded to optimise housing capacity and provide an uplift in affordable housing. Tower Hamlets will work towards a clean and green future where carbon emissions and overall energy usage are reduced. We will prioritise the reuse and adaptation of buildings and where not feasible, the recycling of building materials. We will support walking and cycling links alongside the use of, and improvements to,

the public transport network. The transport needs of all residents will be considered as part of future development opportunities, particularly where this supports mobility needs or for the purposes of employment. The borough's network of green and blue spaces, including Victoria Park, Mile End Park, Mudchute Park, the Thames, River Lea, Dock Basins, and canals, will provide opportunities for leisure, relaxation, and entertainment with a variety of uses encouraged to support health and well-being while still ensuring their enjoyment and function as open spaces is retained.

9.3 The borough, having regained the planning powers for parts of Bromley-by-Bow, Fish Island, and Hackney Wick from the LLDC, will continue to integrate and grow the distinctive opportunities these areas offer.

9.4 The borough's small businesses, start-ups, and markets including Whitechapel Market, Petticoat Lane Market, Bethnal Green Markets, Roman Road Market, Columbia Road Market, Watney Market, Crisp Street Market, Brick Lane Market, and other local traders will be prioritised and at the heart of decision-making. The key employment areas of Canary Wharf, Whitechapel, and the City Fringe will continue to evolve into dynamic centres of innovation and global hubs for the financial, technology, professional, life-sciences, biotech, and digital sectors. The continued benefits of the Elizabeth line arrival will further unlock the unique opportunities available within the borough. A community wealth building approach will be adopted, alongside the provision of genuinely affordable workspace will be prioritised for local small businesses, local start-ups, makers, the creative industries, and emerging and thriving small and medium-sized enterprises.



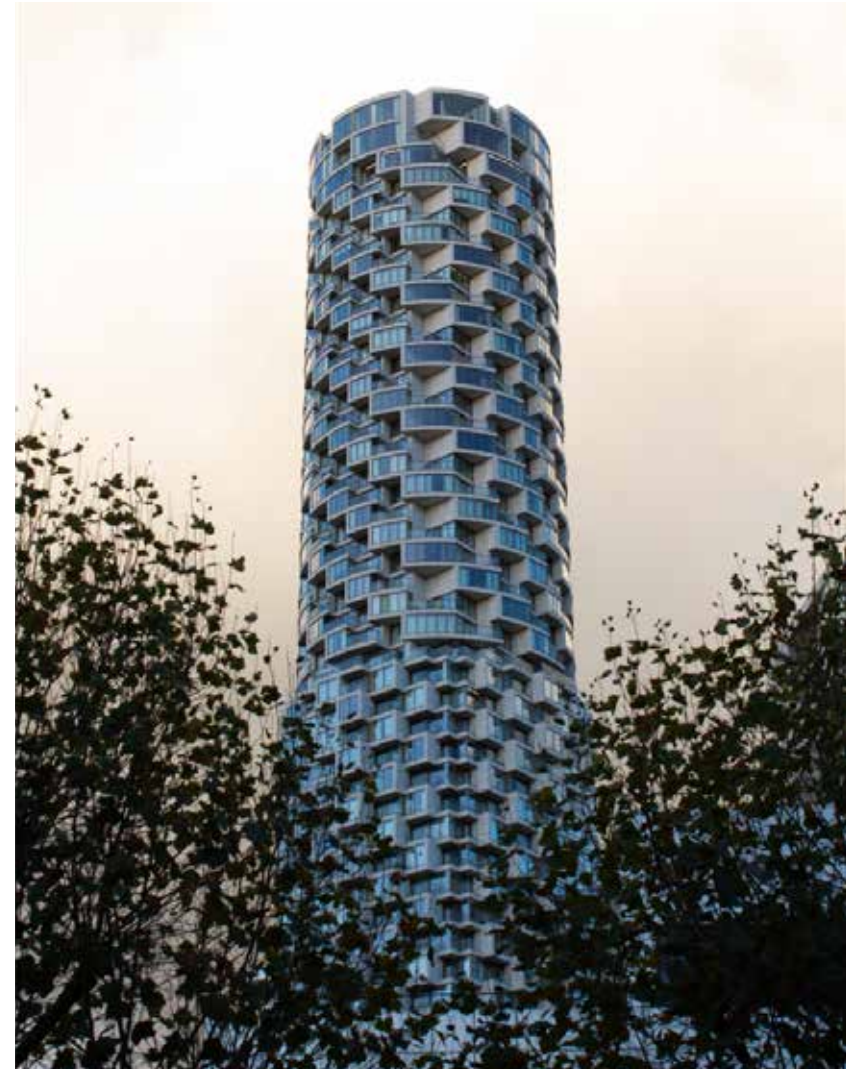
9.5 We will identify and coordinate the provision of infrastructure necessary to support our growing population, including promoting the delivery of new parks, public transport improvements, educational, health, community, cultural, and recreational facilities across the borough.

9.6 Our unique town centres, markets, historical, and cultural attractions will be revitalised to support local communities and become some of London's top attractions. With the borough's growing

population, young people will be at the forefront of anticipated regeneration with jobs, homes, spaces, and environments geared towards their success.

9.7 Exceptional design and architectural innovation will be ensured across the borough to ensure our distinct buildings, skylines, and streetscapes provide a high-quality environment for our residents and remain a recognisable feature of London. We will celebrate the vibrant history and urban landscape of Tower Hamlets through thoughtful design and placemaking, highlighting our rich, historic, and significant character areas. Tower Hamlets will emerge from the economic impacts of the COVID-19 pandemic and Brexit to maintain its status as an international hub for business, culture, and tourism. Our unique location, with strong links to the City of London, Stratford, London City Airport, and beyond, will allow for a rich mix of strategic functions that benefit the community.

9.8 By 2038, Tower Hamlets will have made significant strides in addressing overcrowding, delivered thousands of new homes to support the community, provided opportunity for markets and small local businesses to thrive, and improved the overall health and safety of residents. The borough will have continued to play a role in supporting London's growth and economy through sustainable development. The borough's strong and inclusive communities will be thriving within healthy environments, ensuring a brighter future for all.



10. Key objectives and principles

The Local Plan's strategic objectives provide a link to the delivery of the vision for Tower Hamlets. These objectives address the key challenges of the borough over the 15-year plan period.

The objectives have been informed by and reflect many of the key documents prepared by the council, including the Strategic Plan (2022-2026).

10.1 **Empowering our communities culturally, economically, and politically:**

- a. Growth will be delivered through high-quality, best practice design outcomes that optimise land and the opportunity made available by the borough's unique assets. Such growth will be delivered to retain, reinforce, and protect the historic character of Tower Hamlets to ensure the identity of our neighbourhoods, communities, and townscapes remain special and distinctive.
- b. Important views and landmarks across the borough that make architectural, cultural, or aesthetic contributions will be protected and where possible enhanced.
- c. Arts and cultural event spaces and businesses will be encouraged to flourish and supported to thrive as part of the distinct identity of communities.
- d. Communities will be empowered to be involved within the planning system at the earliest opportunity; through consultation, making the process more transparent and accessible, and providing support for the process of neighbourhood planning.



10.2 **Tackling overcrowding and housing in our borough:**

- a. Tower Hamlets will respond to the growth of the borough through positively managing the delivery of new homes to meet the diverse needs of the wider population.
- b. Tackling overcrowding across the borough will be prioritised to combat levels of increased poverty, physical and mental illness, and poor living standards through increasing overall housing supply, setting a target of 50% genuinely affordable homes across the borough and ensuring the delivery of larger sized homes within affordable and social rented units.

- c. The delivery of genuinely affordable, family-sized, low-cost social rent homes will be prioritised in lieu of intermediate products to respond to the borough's most critical need.
- d. High-quality housing stock will be delivered along with the provision of a range of housing products that cater to specific needs, including for older people.
- e. The borough's emphasis on mixed and inclusive communities will be reinforced to encourage community cohesion that both enables communities to welcome new residents and ensure existing residents remain rooted within their local neighbourhood.
- f. New homes will be located and designed to ensure equitable access to high-quality local services, amenities and public spaces.
- g. The capacity of development sites across the borough will be optimised, making efficient use of land, ensuring appropriate densities and exploring the potential for tall buildings. h. The use of innovative building types and technologies will be encouraged in suitable locations to provide sustainable high-quality internal and external living environments.
- h. The provision and enhancement of infrastructure including community and youth services will be identified and coordinated.

10.3 **Supporting young people and accelerating education:**

- a. Tower Hamlets will continue to support the development of skills, training, and career opportunities for young people, ensuring long term prospects within the borough's key industries and sectors.
- b. Public space, play areas, and community infrastructure will be of high quality, and be safe, fun, and welcoming for all young people to support recreational use, active and healthy lifestyles.
- c. Access to education, learning interventions, opportunities for financial support, and childcare provision will be prioritised to support young people and the community.
- d. Community functions across the borough will be supported, including an investment in youth services to support young people with study spaces, career advice, the development of life skills, and leisure activities.
- e. Investment in young people across the borough and effective support for educational aspirations will be secured to ensure increased opportunities at the country's top universities. Initiatives including the council's priority to deliver an Institute of Academic Excellence will be supported.



10.4 A thriving local and global economy that boosts jobs, skills, businesses and tackles inequalities:

- a. Local traders, entrepreneurs, start-ups, and small local businesses will be supported and provided with opportunity to thrive. Access to genuinely affordable workspace options will be delivered across the borough.
- b. The borough's markets including Whitechapel Market, Petticoat Lane Market, Bethnal Green Markets, Roman Road Market, Columbia Road Market, Watney Market, Chrisp Street Market, and Brick Lane Market will be strongly supported and invested in with their maintenance, promotion, and general upkeep at the heart of decision-making.
- c. Local businesses will take advantage of the borough's proximity to world-class visitor attractions (including the Tower of London world heritage site, the Tower Bridge, and Brick Lane), encouraging visitors to explore more of the borough.
- d. The current skills gap and inequalities amongst the working population will be closed, through improving access to education, training, careers, social mobility, and increasing the mix of employment sectors.
- e. Local job opportunities, education, and skills opportunities (including apprenticeships, internships, work placements, and graduate placements) will be prioritised through development schemes, with a particular emphasis on promoting inclusion to support under-represented groups (e.g., SEND residents, women, and BAME residents).

- f. The borough's role as a key location for employment opportunities will continue to flourish, optimising the economic benefits of Canary Wharf, Whitechapel, the City Fringe, and growing business and economic hubs across Tower Hamlets.
- g. The benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf, and other transport schemes will act as a further catalyst for investment and economic growth in the borough.

10.5 **Securing infrastructure delivery to protect and strengthen public services:**

- a. Tower Hamlets will meet the duties to deliver essential physical, digital, community, and green infrastructure, linked to effective infrastructure planning and delivery including through the securing of obligations through Section 106 Agreements.
- b. The timely provision of sufficient infrastructure, optimised capacity and densities to meet current and future needs will be secured, taking account of the cumulative impact of future development, especially in deficient areas.
- c. Additional transport investment (including improvements to bus, rail, and river services, new river crossing opportunities, and pedestrian and cycle connections) will be championed to support growth.
- d. Improvements in services, programmes, and facilities that support adults social care, children's services, children with SEND, and children in trouble with the law will be promoted across development opportunities.

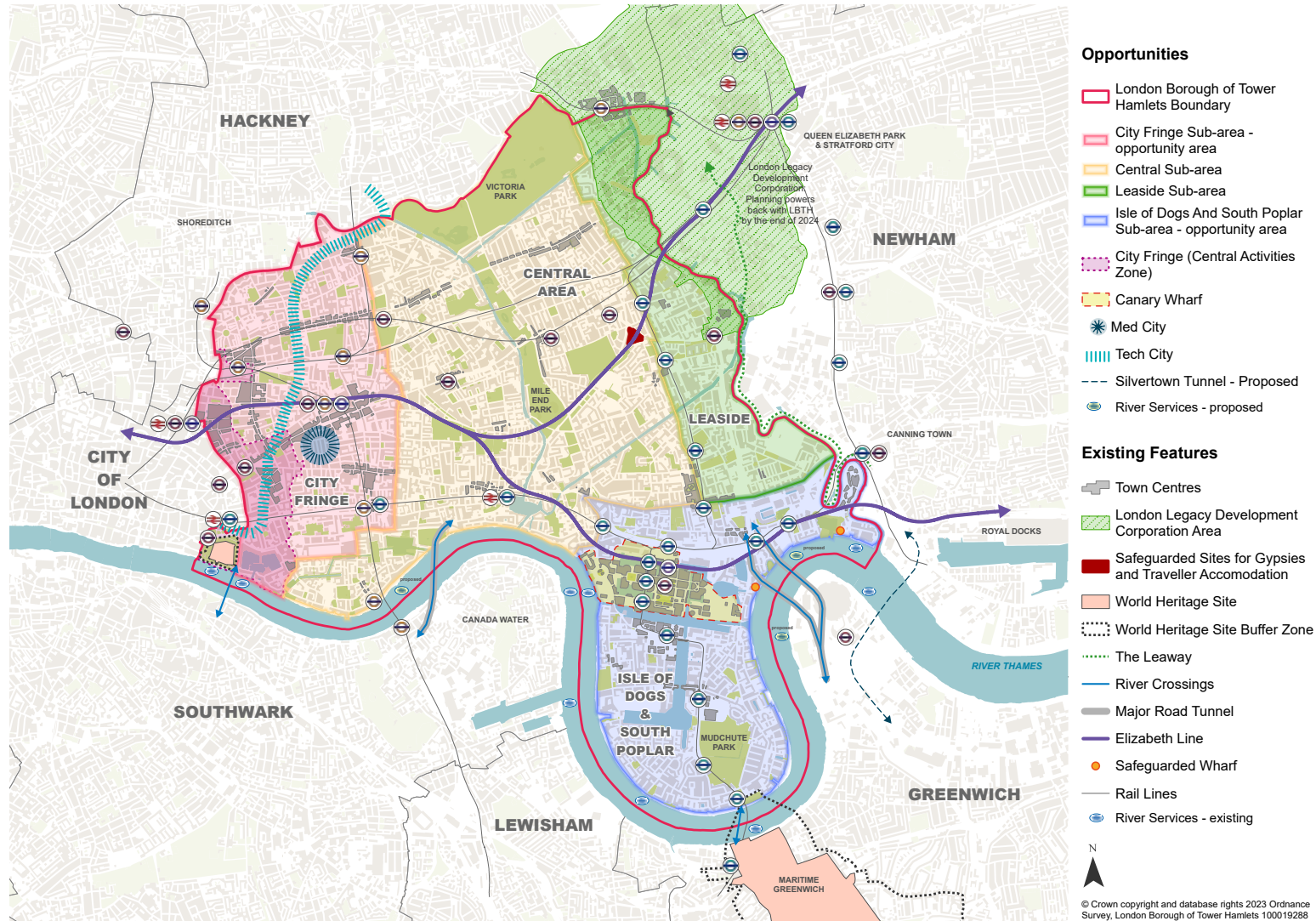
- e. The borough's network of libraries and idea stores will be supported and invested in with their contributions to the borough's residents invaluable.
- f. Partnerships and collaborations across the borough will be promoted including opportunities for integrated health and care services to meet residents' needs.

10.6 **A clean and green future:**

- a. Tower Hamlets will become a net zero carbon borough by 2045 or sooner.
- b. Tower Hamlets will play its part in tackling the climate emergency through ensuring zero carbon developments are delivered across the borough alongside the exploitation of low carbon energy sources and through the support of retrofit opportunities on existing buildings to be climate resilient.
- c. The use of sustainable transport modes including walking, cycling and electric vehicles will be promoted to realise long-term energy use reductions and carbon emissions. Energy efficiency and other green measures will be maximised through development.
- d. The number of electric vehicle charging points in the borough will be increased and support provided to those in the community who depend on their car for work or mobility in accordance with the Mayor's commitments outlined in the 'Cleaner and greener future for Tower Hamlets' document (2023).

- e. The ecological, biodiversity, and recreational value of the borough's natural assets will be protected and promoted to take advantage of our green spaces and waterways. An overall net gain in biodiversity will be delivered across the borough to increase the resilience and significance of our ecosystem.
 - f. The borough's poor air quality will be addressed to provide a safer living environment, through a range of innovative methods and solutions with strict requirements on developments to be applied.
 - g. Leisure, retail, jobs, services, and associated necessary infrastructure will be located to best support local neighbourhoods and to reduce the need for long-distance travel. This will assist local residents in supporting physical activity, active travel, greener streets, and public spaces.
 - h. Flood risk will be mitigated through the use of multi-functional green spaces including sustainable drainage systems, improved flood defences, and innovative water management methods.
- 10.7 **Healthy, safe and inclusive neighbourhoods:**
- a. People of all ages, background, and abilities will be provided with an environment that encourages and enables active and healthy lifestyles. Social interaction and accessibility will be promoted in buildings, streets, and spaces to create high-quality places that are valued, enjoyed, and feel safe for all.
 - b. The borough's neighbourhoods will become safer and perceptions of safety will improve by delivering high-quality, legible, visible, and permeable spaces that are inclusive and accessible to everyone. The built environment will comprise welcoming spaces that design out crime and improve resilience to emergencies.
 - c. Socially cohesive, mixed, balanced, and healthy communities will be promoted together with walkable neighbourhoods to enhance the population's wider health and well-being and to address the wider determinants of mental health and deprivation. The effects from the high level of growth and construction will be managed to ensure minimised impacts to local communities.
 - d. Initiatives to develop programmes and spaces for women from ethnic minority backgrounds and faith communities will be supported to empower women and to ensure an inclusive and cohesive community.
 - e. Opportunities to deliver health facilities will be promoted across the borough with an investment in drug treatment, rehabilitation, and recovery programmes, including culturally sensitive projects targeting those under-represented in drug and treatment services.

Figure 6: The key diagram





Policies



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11. Delivering the Local Plan



DV1 – Areas of growth and opportunity within Tower Hamlets

DV2 – Delivering sustainable growth in Tower Hamlets

DV3 – Healthy communities

DV4 – Planning and construction of new development

DV5 – Developer contributions

DV6 – Social value

DV7 – Utilities and digital connectivity

DV8 – Site allocations

Introduction

11.1 The following policies set out a holistic approach to helping realise and implement the vision of the Local Plan and how sustainable development and growth will be delivered in Tower Hamlets. Together, they support our aspiration to build a brighter future, tackle overcrowding and the housing crisis, create a clean and green borough, empower the next generation, and to ensure a multicultural and diverse community that thrives within mixed, cohesive, and inclusive neighbourhoods. This is about shaping the future of life in Tower Hamlets.

11.2 This section contains the following policies:

- Policy DV1: Areas of growth and opportunity within Tower Hamlets
- Policy DV2: Delivering sustainable growth in Tower Hamlets
- Policy DV3: Healthy environments
- Policy DV4: Planning and construction of new development
- Policy DV5: Developer contributions
- Policy DV6: Social value
- Policy DV7: Utilities and digital connectivity
- Policy DV8: Site allocations

Policy DV1 Areas of growth and opportunity within Tower Hamlets

1. To meet the borough's pressing needs the council will promote development proposals in locations across the borough, particularly where they support housing delivery, and work with the community and stakeholders to support the principles of sustainable development and good growth. This will be achieved through:

- a. promoting the majority of the borough's growth towards:
 - i. the borough's site allocations where significant development opportunities are identified;
 - ii. highly accessible locations which have good links to public transport, walking and cycling networks, and local services;
 - iii. the opportunity areas, as illustrated in figure 6, of the City Fringe, Poplar Riverside, and the Isle of Dogs and South Poplar; and
 - iv. the Central sub-area of the borough, through gradual intensification and optimised site capacity while respecting and enhancing the area's well-established character.
- b. promoting comprehensive design and development to ensure co-designed site masterplanning.

2. The council will require development proposals that are within or part of a site allocation to deliver design-led site optimisation that accords and is compatible with the identified land uses, infrastructure requirements and site allocation specific design and delivery principles.

3. The council will prioritise development proposals for residential use which comply with the affordable housing policies of the Local Plan.

4. The council will promote, protect, and support the 'everyday economy,' that creates new jobs, businesses, services, and local employment opportunities for residents across the borough. This will be achieved through:

- a. promoting affordable workspace opportunities to support local businesses, start-ups, entrepreneurs, and small-to-medium sized enterprises (SMEs);
- b. protecting and enhancing the borough's Preferred Office Locations (POL), Central Activities Zone (CAZ) and Canary Wharf Fringe for commercial and employment-led development, strategic CAZ functions or other uses considered appropriate in accordance with the role and function of their designation;
- c. protecting and supporting intensified industrial development within the borough's Strategic Industrial Locations (SIL) and Local Industrial Locations (LIL);
- d. supporting a mix of employment accommodation types for secondary, local or specialist need within the borough's Local Mixed-use Employment Locations (LMEL), and
- e. promoting the protection and retention of railway arch space for a wide range of industrial uses and community spaces across the borough.

5. The council will promote the borough's town centres, including high streets and street markets, and ensure these continue to be the focus

of shopping, leisure, cultural, and community activities, and will include a broad range of uses that are accessible to a significant number of people via foot, cycle, or public transport.

6. Where appropriate the council will require developments to deliver significant new infrastructure to support growth within the four sub-areas, including:

- a. improvements to the transport network and wider strategic and local connections;
- b. green grid projects;
- c. community infrastructure;
- d. outdoor sports pitches, new parks, and public open spaces; and
- e. the delivery and coordination of essential new and upgraded utilities and services across the borough.

7. The council will support opportunities to maximise the delivery of social value to positively contribute to additional social, economic, environmental, and community benefits, including economic well-being, social inclusion, equal opportunity, and community cohesion.

Supporting text

11.3 This policy recognises that the whole borough has a role to play in addressing development needs, while seeking to ensure new development is in keeping with the principle of good growth and can deliver sustainable communities. Part 1 of this policy sets out the broad locations and opportunity areas within the borough where growth (primarily housing delivery) and investment will be targeted over the lifetime of the plan. The growth will also be complemented by development on small sites. Significant housing delivery is needed across the borough help alleviate overcrowding and to ensure genuinely affordable housing is provided to those most in need.

11.4 Part 1(a)(i) looks to direct the majority of the borough's growth towards the borough's site allocations. These are sites that have been identified across a range of locations within each of the sub-areas to address the housing and employment needs of the borough as well as facilitate the delivery of key supporting infrastructure, such as publicly accessible open space, schools, and other social infrastructure. These sites are shown on the Policies Map. Further information on the detailed site-specific requirements that will inform the design, scale, and layout of new development within these allocations is set out in Section 4.

11.5 Part 1(a)(ii) aims to direct growth to highly accessible locations with good links to existing or commitment to the delivery of public transport, cycling and walking networks, and town centres in line with policies TC1 and MC1.

11.6 Part 1(a)(iii) seeks to direct growth towards the three opportunity areas (City Fringe, Poplar Riverside, and Isle of Dogs and South Poplar) which have been identified in the borough by The London Plan (GLA, 2021) and have significant potential to accommodate new development and support urban renewal given their capacity for growth and existing

and planned infrastructure. These areas are shown on the key diagram (see Figure 6).

11.7 Part 1(b) expects all development proposals to demonstrate comprehensive design and development. Piecemeal delivery on sites will be resisted. Piecemeal delivery is where individual developments on shared sites or adjacent sites are delivered in different ways and at different times without coordination between the developments, leading to a poor quality of placemaking and lack of vision for the wider area. Instead, development proposals on shared sites or on sites in proximity to other development sites must demonstrate co-designed site masterplanning has taken place which realises the site vision and design principles, creating high-quality places and neighbourhoods, and ensuring that the timing of delivery is supported by the necessary infrastructure.

11.8 Part 2 aims to ensure that development proposals within or part of the borough's site allocations realise the site vision and design principles, and ensure the timing of delivery is supported by the identified infrastructure requirements. This can be achieved through design-led site optimisation which seeks to ensure that development makes the best use of land through the consideration of design options, determining the most appropriate density and form of development for the site's context, capacity for growth and connections to jobs, services, infrastructure, and amenities.

11.9 Part 3 of the policy highlights the council's prioritisation of affordable housing delivery in the borough and the need for development to comply with the affordable housing policies of the Local Plan to alleviate the large-scale levels of overcrowding and lack of affordable housing in the borough.



11.10 Part 4 of the policy seeks to ensure new development promotes, protects, and supports the "everyday economy" which focuses on jobs, opportunities, and the experiences of local people and residents across the borough.

11.11 Part 4(a) looks to promote the provision of affordable workspace across the borough to support the "everyday economy," particularly local businesses, start-ups, entrepreneurs, and SMEs.

11.12 Part 4(b) seeks to protect and enhance employment-led development, or other strategic CAZ functions and appropriate uses, in the following strategic locations: the Preferred Office Locations

(POL); CAZ and Canary Wharf Fringe (as identified on Figure 16). In particular to support Tech City - a strategically important business cluster within the heart of the City Fringe sub-area, centred on digital and creative companies, particularly around Shoreditch, Spitalfields, and Whitechapel, and a new state-of-the-art life science research hub around the existing Queen Mary University campus and Royal London Hospital site in Whitechapel alongside residential and commercial uses.

11.13 Part 4 (c) seeks to protect the borough's Strategic and Local Industrial Locals. Given the borough's limited area and increasing demand for industrial land it is necessary to protect such locations to ensure there is land to meet such employment and business needs.

11.14 Part 4(d) and (e) support the need for mixed and innovative uses in employment areas and also maximising opportunities in railway arch spaces.

11.15 Part 5 emphasises that the council will promote the borough's town centres as the economic, transport, social and civic hearts of our communities, offering the greatest accessibility to jobs, services, shops and public transport. They have faced great challenges as a result of global circumstances over the past few years, most notably the COVID-19 pandemic and its follow-on consequences. In order to stimulate recovery and to nurture vibrancy back into our town centres, high streets, and street markets, there is a need to diversify and increase accessibility to attract more people and businesses throughout the day and evening as well as meet changing customer demands. The network and hierarchy of centres is set out in policy TC1, with each centre performing a different but complementary role.

11.16

11.17 Part 6 outlines the requirements on developments to deliver new infrastructure and utilities to meet the demand from significant levels of development in the borough and the resulting population growth across the Local Plan sub-areas of City Fringe, Isle of Dogs, Central Area and Lower Leaside. A range of facilities, services, and infrastructure will need to be delivered. This includes:

- a. improvements to the transport network and wider strategic and local connections;
- b. green grid projects (including East India Dock, the Lea River Park and Whitechapel Green Spine);
- c. community infrastructure, such as schools, youth clubs, early education and childcare facilities, purpose built special educational needs schools/teaching units, new parks, open space, health centres, sports centres and leisure facilities;
- d. outdoor sports pitches, new parks and public open spaces; and
- e. coordinating the delivery of essential new and upgraded utilities and services infrastructure across the borough to ensure utilities networks and connections can serve new developments, supporting the creation of new neighbourhoods and enhancing facilities on sites of intensification.

11.18 As well as requirements for additional infrastructure, much of the borough's existing infrastructure is at or close to full capacity and in many cases requires investment. Developers are therefore expected to contribute towards meeting the additional infrastructure needs arising from new development. Further details (including the mechanisms through which developers will be expected to contribute towards

infrastructure provision) are outlined in Policy DV5, Section 4 (relating to site allocations) and Section 5 (relating to the monitoring and delivery framework).

11.19 As well as requirements for additional infrastructure, much of the borough's existing infrastructure is at or close to full capacity and in many cases requires investment. Developers are therefore expected to contribute towards meeting the additional infrastructure needs arising from new development. Further details (including the mechanisms through which developers will be expected to contribute towards infrastructure provision) are outlined in Policy DV5, Section 4 (relating to site allocations) and Section 5 (relating to the monitoring and delivery framework).

11.20 Part 7 sets out that Social value refers to a broader concept of value beyond just monetary contribution. It focuses on people and contribution to the community, assessing the positive value created for the local economy, improvements in social well-being, and enhancements to protect the local environment. There is a precedent for considering social value as a key factor in procuring contracts after the passing of the Public Services (Social Value) Act 2012. When applied to development, social value looks at the wider social contribution a development creates for society across its whole lifecycle, from how it is constructed to how it is managed, considering its direct and indirect impacts. This is in-line with Part 2 of the NPPF 'Achieving Sustainable Development', which outlines the three objectives of the planning system: to promote economic well-being, improve social progress, and protect and enhance our natural and built environment.

11.21 This policy will be implemented through a number of mechanisms such as supplementary planning guidance, masterplans, and opportunity area frameworks, which provide more detailed guidance to coordinate and manage development alongside the London Plan.

London Plan policies:

- H2 Small sites
- GG1 Building strong and inclusive communities
- SD1 Opportunity Areas
- SD4 The Central Activities Zone (CAZ)
- SD5 Offices, other strategic functions and residential development in the CAZ
- SD8 Town centre network

Local Plan policies:

- All policies

Evidence base:

- The London Plan, 2021
- City Fringe Opportunity Area Planning Framework, 2015
- Isle of Dogs and South Poplar Opportunity Area Planning Framework, 2019
- South Poplar Masterplan SPD, 2021
- Central Area Good Growth SPD, 2021
- Queen Mary University London SPD, 2021
- Tower Hamlets Conservation Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan

Policy DV2 Delivering sustainable growth in Tower Hamlets

1. The council will support development proposals that contribute towards delivering the Local Plan vision and objectives where they:
 - a. ensure a design-led approach is taken to development, which requires:
 - i. high-quality design and delivery;
 - ii. optimising capacity, the efficient use of land, ensuring appropriate density, and exploring the potential for tall buildings;
 - iii. the promotion and enhancement of the historic environment, character, and setting of the area; and
 - iv. the protection of the natural environment, transport capacity, and infrastructure.
 - b. contribute towards an inclusive, cohesive, and mixed environment that is designed and useable for all. This will be achieved through:
 - i. creating healthy, equitable environments by encouraging physical activity, promoting good mental and physical well-being, and reducing environmental factors which can contribute to poor health, including overcrowding, poor air quality, and mitigation against damp and mould;
 - ii. creating mixed and inclusive communities;
 - iii. understanding the local population and their needs, and conducting appropriate community engagement to achieve this;

- iv. delivering tenure-blind developments;
 - v. increasing opportunities for social interaction;
 - vi. providing local training, employment, and enterprise opportunities in the construction and end use of a development;
 - vii. supporting the use of local goods and services as part of developments;
 - viii. providing local careers, social mobility and tackling poverty; and
 - ix. delivering social infrastructure, transport infrastructure, and public realm improvements which are inclusive and accessible to all.
 - c. contribute towards a clean and green future that ensures:
 - i. zero carbon developments, sustainable design, construction, and operation, and prioritise the whole lifecycle of buildings;
 - ii. the use of circular economy principles and prioritisation of the reuse and recycling of buildings and materials;
 - iii. low carbon energy and heat production;
 - iv. ambitious mode share targets for sustainable travel, and promoting sustainable freight;
 - v. mitigated impacts of poor air quality; and
 - vi. mitigated flood and drought risk.

Supporting text

11.22 This policy seeks to deliver sustainable development and growth in Tower Hamlets, addressing the specific environmental, social, and economic challenges facing the borough. It seeks to ensure each individual development positively contributes to implementing and delivering the vision and objectives of the plan.

11.23 For the purposes of part 1(a) of this policy, we will consider the application and design in its entirety including its relationship to its surroundings. Impacts will be considered unacceptable when they do not meet the standards and requirements provided in the policies in the plan or where they result in negative impacts that cannot be adequately mitigated. Development proposals will also be expected to conform with guidance from the council on securing design quality.

11.24 Part 1(b) requires the design of the built environment and the provision of accessible services to directly contribute to reducing inequalities (including health and wealth inequalities) and promoting community cohesion through mixed and inclusive communities. This policy addresses these objectives and helps to empower our communities and deliver healthier, more inclusive, safer, and cleaner spaces throughout the borough. Planning has a particular role to play in ensuring the built environment is accessible to all and benefits the local community. In order to demonstrate compliance, developments will be expected to provide details within the planning application statement identifying how they have met the principles outlined above. Development proposals should consider these principles from the outset and are encouraged to engage with the council through pre-applications where appropriate to ensure they are meaningfully met.

11.25 Part 1(c) seeks to address the need to achieve a clean and green future for the borough, a key priority in the council's Strategic Plan (2022-

2026), reflecting the significant need to reduce carbon emissions to tackle climate change and meet the goal of becoming a carbon neutral borough by 2045, as well as addressing the pressing need to improve cleanliness and air quality so that residents, workers, and visitors can enjoy a healthier and cleaner borough. Improvements in the standard of development through zero carbon development, sustainable operation and circular economy principles will reduce carbon emissions and help the borough achieve this goal. Mode share targets should seek to meet those set out in the Mayor's Transport Strategy.

London Plan policies:

- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG6 Increasing efficiency and resilience
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D9 Tall buildings

Local Plan policies:

- All policies

Evidence base:

- Tower Hamlets Council Strategic Plan, 2022
- Tower Hamlets Health and Well-being Strategy, 2021
- Tower Hamlets Joint Strategic Needs Assessment, 2017
- Healthy Streets for London, 2017
- Mayor of London's Transport Strategy, 2018

Policy DV3 Healthy communities

1. Development proposals are required to maximise health benefits, minimise harm to health, and promote health equity for new and existing communities. This will be achieved by:
 - a. designing for an inclusive built and natural environment, which considers and responds to the needs of the whole community regardless of age, gender or ability, and promotes physical activity where possible, including layouts that encourage walking and cycling.
 - b. providing accessible and inclusive high-quality open spaces, culturally sensitive community facilities, and an equitable urban realm that supports walking, wheeling, other forms of active travel and social interaction; and
 - c. ensuring internal spaces are well-ventilated to prevent damp and mould occurring and are appropriately sized to avoid overcrowding.

2. Major development proposals are required to complete and submit a rapid Health Impact Assessment (HIA) as part of their planning application.
3. Development proposals of a scale referable to the Greater London Authority (GLA) (as set out in legislation) are required to complete and submit a detailed HIA as part of their planning application and must ensure the following is undertaken:
 - a. the scope of the detailed HIA is agreed with the council's development management and public health services prior to commencement of the assessment, and at the earliest opportunity;
 - b. the assessment is undertaken at an early stage of the development process and there is clear demonstration that the assessment has informed the overall design and end use(s) and occupation of the proposal;
 - c. the assessment is undertaken in accordance with the council's latest HIA guidance, and responds to the latest local public health data and community insight gathered by the applicant's team; and
 - d. Recommendations within the HIA are secured and monitored as part of a planning obligation.

Supporting text

11.26 Part 1 of this policy seeks to ensure development contributes towards a healthy built environment in accordance with the NPPF, the London Plan (GLA, 2021) and the objectives of the Tower Hamlets Health and Well-being Strategy (2021-2025). The policy seeks to ensure that the health impacts of all development proposals are considered at the earliest opportunity, so that the positive health benefits are maximised, and the negative health impacts are minimized. This includes mitigation against overcrowding, damp, mould and seeking to encourage more active lifestyles. It should be ensured that the needs of vulnerable groups are met by the development.

11.27 Part 2 of this policy requires major development proposals to complete and submit a rapid HIA, which should be undertaken using the council's most current HIA guidance. Definition of what constitutes a major development proposal can be found in the glossary in Appendix 1.

11.28 Part 3 of this policy requires development proposals of a scale referable to the GLA to complete and submit a detailed HIA, which should be undertaken using the council's latest HIA guidance, and the scope of this assessment agreed with the council's development management and public health services prior to commencement and at the earliest opportunity (part 3(a)). Definition of what constitutes a development proposal of a scale referable to the GLA can be found in the glossary in appendix 1. A HIA can also be submitted as part of an Integrated Impact Assessment.

11.29 As required in part 3(b), the HIA process should begin as early as possible, and it is expected to be initiated at pre-application stage so that the consideration of health can meaningfully influence proposals and how they will be used post completion. Actions should be identified



that aim to enhance the positive impacts and mitigate the negative impacts on the wider determinants of health. The outcome of these actions should be clearly identifiable within the planning application, demonstrating how the proposal has developed its design and strategy in accordance with the findings from the HIA and an engagement process with the local community.

11.30 Part 3(c) of the policy requires the HIA to be undertaken in accordance with the council's latest guidance, and respond to the latest local public health data and community insight gathered by the applicant's team. The HIA submission should visually demonstrate how the design has developed to adapt to serve these identified needs and

improve on the previous strategy.

11.31 Wherever community engagement is required as part of a HIA, steps should be made to ensure all voices, in particular vulnerable groups, are consulted upon. This is to ensure that their needs are understood and that they can inform the recommendations of the assessment.

11.32 As required by part 3(d) of the policy, recommendations within the HIA are to be secured and monitored as part of a planning obligation. This will be achieved through undertaking an independent post occupancy evaluation of residents and users of the development to assess whether the development is equitably meeting the needs of its occupants and the wider neighbourhood, identify areas for improvement and a plan of action to help elicit improvements and provide learning that informs better decisions in the future.

London Plan policies:

- GG3 Creating a healthy city

Local Plan policies:

- All policies

Evidence base:

- Tower Hamlets Spatial Planning and Health Needs Assessment, 2023
- Tower Hamlets Health and Well-being Strategy, 2021
- Tower Hamlets Joint Strategic Needs Assessment, 2017
- Healthy Streets for London, 2017
- Tower Hamlets Air Quality Action Plan, 2022
- Tower Hamlets Air Quality Annual Monitoring Report



Policy DV4 Planning and construction of new development

1. Major development proposals should sign up to the Tower Hamlets Code of Construction Practice (CoCP) and where appropriate, a constructors' forum. All construction sites in the borough should meet or exceed requirements set out in the Tower Hamlets CoCP.
2. Development proposals should undertake consultation with the council and neighbouring residents and businesses likely to be affected by their works, prior to commencement, for coordination and mitigation of disruption.
3. Development proposals should ensure consultation with the development and utility coordination team of Tower Hamlets as early as possible in the development process.
4. Major development must consider the cumulative impact of their development on the amenity of local residents and businesses in the vicinity of the site. This should be addressed through:
 - a. outlining measure to address these cumulative impacts in the Construction Management Plan (CMPs) and Site Environmental Management Plans (SEMPs).
 - b. Working collaboratively with other nearby developers and the council.

5. The Council will secure financial contributions towards coordination and integration of development activity to help address the cumulative impact of construction from sites across the borough.
6. Development is required to employ the highest standards of sustainable construction, including:
 - a. sustainable construction methods, such as the use of sustainably sourced, low embodied carbon and recycled materials; and
 - b. the use of demolished material from the development site, where practicable, in order to minimise the transportation of waste, reduce carbon dioxide emissions, and to facilitate the transition to a circular economy.

Supporting text

11.33 This policy recognises that the high levels of growth within the borough are mainly taking place alongside, or within, areas which are already densely inhabited or have been allocated for large scale development. It therefore seeks to ensure development minimises its impact on the local environment, existing and emerging communities.

11.34 Part 1 sets out how the council expects developers to sign up to the Tower Hamlets Code of Construction Practice (CoCP) and a constructors' forum (where appropriate) to better manage and mitigate the cumulative impacts arising from construction on the borough's key development sites. The Tower Hamlets CoCP seeks to set out simply and clearly what constitutes acceptable site practice within the borough. It is intended to help developers, architects, engineers and construction professionals to plan, cost and manage the environmental mitigation required to protect the health, safety and well-being of our residents and businesses.

11.35 Part 2 ensures that there is ongoing communication and regular updates, at each phase of delivery, by those responsible for the development's delivery to the Council. This aids the facilitation of development coordination.

11.36 Developers will also be expected to sign up to the Considerate Constructors Scheme (CCS), which is a national initiative which seeks to promote safe and considerate building practice and engineering works and improve standards of neighbourliness. Sites that are registered under the scheme are independently assessed and monitored against a code of considerate practice, designed to encourage higher

standards of conduct. We may also consider membership of alternative constructor schemes as also meeting the requirements of this policy. Developers are also encouraged to sign up to the Construction Logistics and Community Safety (CLOCS) standard which ensures constructors achieve the safest, leanest, and greenest construction vehicle journeys.

11.37 Part 3 requires development proposals to consult the development and utility coordinator teams of Tower Hamlets as early as possible in the development process. This is to allow the scheme to meet the requirements of the CoCP and to liaise with local utility and service providers in advance of commencement of development and to minimise disruption.

11.38 Part 4 of the policy seeks to ensure that construction impacts from the site and from other major developments within the vicinity of the proposal site are assessed and mitigation actions identified. Developers should take account of noise, vibration, artificial light, odour, air quality, fumes, dust or pollution, hours of operation, delivery timings and routes and location of equipment accordingly to reduce this impact. This should be evidenced through the Construction Logistics Plan (CLP), Construction Management Plan (CMP) and Site Environmental Management Plan (SEMP). Further guidance on producing a CLP can be found in the Sustainable Design and Construction Supplementary Planning Guidance (GLA 2014) and our latest CoCP.

11.39 Given the very high levels of construction activity occurring in already high-density locations across the borough, the council consider that strategic solutions are required to address to cumulative impacts of construction activity. This can only be achieved through collaboration between the council and other developers.

11.40 As set out in part 5, the council will secure a financial contribution towards co-ordination and integration of development activity, including leading and/or delivering projects and interventions by the council to address the cumulative impacts.

11.41 Part 6 requires development to employ the highest standards of sustainable construction. It seeks to reduce development waste and encourage the process of limiting waste to begin early in site development. The design and materials used in the construction of new buildings (including the need to choose sustainable materials, sustainable construction methods and incorporate circular economy principles) can make a significant difference to the energy requirements and associated level of carbon emissions. Sustainable construction methods include volumetric building, panelised systems and offsite manufacture (Modern Methods of Construction) which all have benefits in terms of limiting waste and increasing build quality and providing the opportunity for design for disassembly. Evidence of a commitment to low carbon and low emission energy sources for construction and related transport should also be demonstrated. Applicants should evidence how the development will meet the requirements set out in Part 5 of the policy in the design and access statement and/or the sustainability statement, as part of the planning application. More detailed guidance can be found in the Sustainable Design and Construction Supplementary Planning Guidance (GLA 2014) and the Circular Economy Statement LPG (GLA 2022).

London Plan policies:

- SL1 Improving air quality
- SL2 Minimising greenhouse gas emissions
- SL7 Reducing waste and supporting the circular economy

Local Plan policies:

- PS1 Design and infrastructure-led approach to development
- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- CG4 Embodied carbon, retrofit and the circular economy
- CG10 Air quality
- CG11 Noise and vibration
- MC1 Sustainable travel
- MC3 Impacts on the transport network
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Tower Hamlets Code of Construction Practice, 2023
- Circular Economy Statement LPG, 2022
- Control of Dust and Emissions SPG, 2014
- Sustainable Design and Construction Supplementary Planning Guidance (GLA 2014)

Policy DV5 Developer contributions

1. Development proposals will be required to:
 - a. pay Community Infrastructure Levy (CIL) charges required by any charging schedules which are in operation for the area within which the development is located, including the Mayor of London's Community Infrastructure Levy (MCIL);
 - b. enter into Section 106 agreements to provide affordable housing and make provision to mitigate the impacts of the development where necessary or appropriate, having regard to any relevant policies, supplementary planning documents or guidance; and
2. Proposal which seek to provide CIL-in-kind in exchange for the delivery of strategic infrastructure are required to:
 - a. provide robust justification for CIL-in-kind in comparison to contributions towards strategic infrastructure;
 - b. set out in detail the proposed type of infrastructure which would qualify as CIL-in-kind; and
 - c. engage early in the development process with the council's infrastructure planning team.

3. Where development proposals are seeking CIL-in-kind in exchange for the delivery of strategic infrastructure, discussions should be opened with the council at the earliest possible opportunity to determine what kinds of infrastructure will be granted CIL-in-kind on the site.
4. Vacant building credit has the potential to adversely impact our ability to meet the affordable housing target and will not apply in the borough. This policy acts as an exemption from its application in Tower Hamlets.

Supporting text

11.42 In order to ensure that the policies and infrastructure requirements of the Local Plan are delivered in a way that achieves sustainable development, we will seek contributions from developers to fund improvements to infrastructure and the environment. Contributions will be made through the Community Infrastructure Levy (CIL) (which applies a standard charge to developers to fund supporting infrastructure such as transport, schools, health and community facilities) and/or Section 106 agreements (which address the provision of affordable housing and site-specific infrastructure or development mitigation requirements).

11.43 The spatial vision and objectives emphasise the importance of managing growth and shaping change. This puts planning for infrastructure at the heart of the Local Plan, ensuring that new development in the borough contributes towards the provision of infrastructure that is needed to support growth and enable everyone in the borough to benefit from the opportunities this infrastructure will bring.

11.44 Developer contributions can help to contribute to the success of a development and the needs of the wide community in line with the key priorities set out in the Local Plan vision. For instance, they can enhance the benefits that arise from a development to the local community and equally ensure it does not give rise to unacceptable development impacts.

11.45 The council will work collaboratively with our partners to deliver the infrastructure necessary to support the growth and development identified within the Local Plan, understanding the contribution that this

growth can make to achieve the wider objectives of the plan and other relevant strategies. The Infrastructure Delivery Plan (IDP) identifies the types of infrastructure required to support the anticipated growth in the borough, and additional infrastructure requirements will be identified during the course of the plan period as appropriate. The IDP sets out the projects across a range of infrastructure requirements which will help deliver the infrastructure needed to serve existing and emerging communities and businesses. The IDP is periodically updated to ensure it is responsive to the infrastructure requirements of the borough. These updates will be undertaken in consultation with both internal and external stakeholders such as service areas and infrastructure providers.

11.46 In order to implement Part 1(a), development must follow both the borough-wide Community Infrastructure Levy (CIL) charging schedule, or any subsequent adopted version; and the Mayor of London's Community Infrastructure Levy (MCIL) charging schedule, or any subsequent adopted version, and supplementary planning guidance.

11.47 The borough-wide CIL (revised and adopted in January 2020) will be used to deliver infrastructure to address the cumulative impact of development in the borough. Necessary items required to mitigate the impact of development such as affordable housing, may be secured through Section 106 obligations.

11.48 The MCIL will help fund strategic transport projects. We collect these receipts from developments in Tower Hamlets and pass them onto Transport for London (TfL). Developments in the borough may be liable for both the Mayoral and borough-wide CIL and, in certain circumstances, pursuant to supplementary planning guidance,

11.49 Part 1(b) seeks to address the use of Section 106 planning obligations to secure the provision of affordable housing and mitigate the impact of development where these cannot be addressed through planning conditions or the CIL. Section 106 planning obligations will be sought where they are:

- a. necessary to make the development acceptable in planning terms;
- b. directly related to the development; and
- c. fairly and reasonably related in scale and kind to the development.

11.50 The measures sought through a planning obligation will vary depending on the nature and scale of a development, its location and impacts. Further information about the requirements for obligations are included throughout this plan. The Planning Obligations Supplementary Planning Document (SPD) provides detailed guidance on our approach to planning obligations. Development which is subject to a Section 106 agreement should apply the SPD, and will be assessed on an individual basis. The obligations identified in the Local Plan and Planning Obligations SPD are not an exhaustive list and the council may wish to negotiate other forms of planning obligations which meet the CIL Regulation 122 tests depending on the individual circumstances of a site and scheme. The methodologies for calculating certain financial obligations are set out in Appendix 2.

11.51 A monetary contribution to cover the monitoring of planning obligations will be secured. This will be calculated on a case-by-case basis, taking into account the nature of the proposed development, obligations secured, and the estimated cost of monitoring.

11.52 Financial contributions may be sought financially or 'in kind' –

where the developer builds or directly provides the matters necessary to fulfil the obligation negotiated as part of the planning application. Where provision is made within developments, this will be credited to the scheme and may offset financial contributions that may otherwise be sought. In-kind delivery of planning obligations will be at the discretion of the council and only in appropriate circumstances.

11.53 Part 1(c) aims to ensure developers maximise contributions towards the delivery of affordable housing and infrastructure in line with the vision and objectives of the plan, whilst still ensuring development can be delivered. Development should follow the guidance set out in the financial viability appraisals and must comply with the Mayor of London's Affordable Housing and Viability London Plan Guidance and the Tower Hamlets' Development Viability SPD. This sets out how the Local Plan policies should be applied in a development viability context when determining planning applications. It aims to provide greater clarity to both applicants and the public and ensure that the principles of sustainable development are at the forefront of decision-making in Tower Hamlets.

11.54 Financial viability is a key consideration in terms of the application of Section 106 planning obligations, and where development does not meet planning policy or propose to provide required planning obligations, financial viability assessments are required to be submitted in accordance with the prevailing local validation requirements checklist or any relevant supplementary planning document. The issue of financial viability should be considered at the earliest opportunity. If an applicant is engaged with us in this regard prior to the submission of a planning application, then the chances of a positive outcome for all sides are greatly increased.

11.55 In the exceptional circumstances where viability constraints prevent the delivery of all policy requirements, there may be some site-specific exceptions where an alternative prioritisation is considered more appropriate. Where necessary to deliver the provision of infrastructure required as part of a site allocation or considered necessary by internal or regional consultees, and proven via viability evidence, additional sources of funding to enable the delivery of the required infrastructure may be identified by the council.

11.56 Part 2 sets out that developments which seek CIL-in-kind will need to be supported by information which justifies and sets out what the CIL-in-kind comprises and how this equates to the strategic infrastructure development contribution. Part 2 emphasises the importance of early discussions with the council in instances where developers are seeking CIL-in-kind. In some instances, the delivery of strategic infrastructure as part of a development proposal may make the development eligible for CIL-in-kind, but this will be at the discretion of the council, following discussions with the Infrastructure Planning team.

11.57 Part 3 sets out our approach to the application of the vacant building credit, which provides an incentive for brownfield development on sites containing vacant buildings. Viability evidence finds there is no need to apply the vacant building credit mechanism in the borough to 'kick start' development (Tower Hamlets Local Plan Viability Assessment 2017). In addition, the effect of the vacant building credit will be to reduce affordable housing contributions and this is contrary to our need to deliver affordable housing through the planning system. The Affordable Housing and Viability Supplementary Planning Guidance (GLA, 2017) sets out the extent to which vacant building credit should be applied in London and concludes that its application is unlikely to be suitable in London.

London Plan policies:

- D2 Infrastructure requirements for sustainable densities
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H7 Monitoring of affordable housing
- T9 Funding transport infrastructure through planning

Local Plan policies:

- HC1 Meeting housing needs
- HC2 Affordable housing and housing mix
- HC7 Purpose-built student accommodation
- HC8 Large-scale purpose-built shared living
- CG1 Mitigating and adapting to a changing climate
- CG2 Low energy buildings
- CG3 Low carbon energy and heating
- CG4 Embodied carbon, retrofit and the circular economy
- CG8 Water efficient design
- EG3 Affordable workspace
- Cl1 Supporting community facilities
- RW2 New and enhanced waste facilities
- MC3 Impacts on the transport network
- MC4 Parking and permit free
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Planning Obligations SPD, 2021
- Development Viability SPD, 2017
- Affordable Housing and Viability SPG, 2017
- Tower Hamlets Infrastructure Delivery Plan

Policy DV6 Social value

1. The council will support opportunities to maximise the delivery of social value to positively contribute to additional social, economic, environmental and community benefits, including economic well-being, social inclusion, equal opportunity, and community cohesion.
2. Major development proposals are required to submit a social value strategy which clearly sets out how social value will be achieved through the construction and operation of the proposed development. The social value strategy must identify how:
 - a. the social value contribution is proportional to the scale of the development; and
 - b. the development will support social inclusion, economic well-being, equal opportunity and community cohesion throughout its lifecycle. This shall include demonstrating how the development will maximise wider social value contributions across the following themes:
 - i. reducing poverty and promoting equality and cohesion in Tower Hamlets;
 - ii. boosting local jobs, skills, opportunities, and economic inclusion (including careers and social mobility);
 - iii. inclusive growth and strengthening the local economy;
 - iv. empowering communities to become more resilient and increase participation; and
 - v. working towards a clean and green future.

3. Where appropriate, the delivery of social value interventions will be secured by planning obligation. Social value interventions will be treated separately to planning obligations required by other policy such as affordable housing or employment and training requirements.
4. The implementation of social value interventions is secured and compliance is monitored as part of a planning obligation.

Supporting text

11.58 Part 1 of the policy sets out the council's intention to maximise the delivery of social value through development, ensuring positive contribution to community benefits including economic well-being, social inclusion, equal opportunity, and community cohesion.

11.59 Part 2 of the policy sets out the requirement for major development proposals to submit a social value strategy. The social value strategy shall identify how the development will deliver social value benefits throughout its lifecycle including during its construction and operational phases, demonstrating that social value delivery has been integrated into the design of the scheme. The strategy will ensure that the development will maximise its positive contribution to economic well-being, social inclusion, equal opportunity, and community cohesion based on site-specific analysis and consultation. Such strategies can be informed by the councils' most up to date guidance on social value in development.

11.60 Part 2(a) requires the social value contribution of a development proposal to be proportional to the scale of development. The social value strategy should demonstrate this and should be introduced as early as possible, so that the consideration of social value can meaningfully influence proposals. Therefore, it is strongly encouraged that the strategy is considered at pre-application stage, should the applicant seek that service. At the design/ pre-application stage it is expected that the social value strategy will be of a higher level, setting out social value goals and identifying when these will be delivered throughout the lifecycle of the scheme. Subsequently, prior to commencement, it is expected that the social value strategy will have been refined and developed in more detail, setting out the social value outcomes that will be delivered by the development.

11.61 Social value should be considered early in the development process and applicants should engage with the council's development management and infrastructure planning teams.

11.62 Part 2(b) requires the social value strategy to demonstrate how the development proposal will support social inclusion, economic well-being, equal opportunity, and community cohesion throughout its lifecycle. To demonstrate this, the strategy should provide a structure as to how social value will be implemented through each stage of the proposal, setting-out clear goals and implementation strategies and outlining measurable targets to ensure effective monitoring, reporting, and assessment.

11.63 The social value strategy will outline how site-specific local needs analysis and community engagement was conducted to understand and co-design what social value could be added through the lifecycle of the development, in response to a real, evidence-based need to benefit the surrounding local community. The Council's development management and infrastructure planning team will offer guidance on groups which could be suitable to be part of the co-design process. Guidance on co-design and community consultation is set out in the Optimising Site Capacity: A Design-led Approach LPG (GLA, 2023).

11.64 The social value strategy will focus on the themes set out in part 2(b), which have been developed in accordance with both national approaches and best practice for measuring social value (including the National TOM's framework) and the priorities set out in the Tower Hamlets Strategic Plan 2022-26:

- i. reducing poverty and promoting equality and cohesion in Tower Hamlets: upholding the council's commitments to reducing poverty and inequality across the borough (including the impacts of the cost-

of-living crisis), as well as promoting diversity and cohesion;

- ii. boosting local jobs, skills, opportunities, and economic inclusion: creating high-quality jobs, training opportunities, and skills and careers support for local people, with a particular focus on those facing barriers to employment;
- iii. inclusive growth and strengthening the local economy: positively contributing to the local economy through inclusive placemaking, supporting local and independent businesses, progressive procurement activities and promoting responsible business practices amongst supply chains;
- iv. empowering communities to become more resilient and increase participation: proactively engaging with local people and businesses (with a particular focus on underserved communities and groups) to shape proposals, and investing in communities to become more resilient through initiatives that will improve safety, health, and well-being; and
- v. working towards a clean and green future: implementing policies and initiatives that support the council's vision to become a carbon neutral borough, improving air quality and reducing waste (including promoting the circular economy).

11.65 It is acknowledged that existing planning obligations would sit in some of the themes above and therefore already provide some social value benefits to the local community. However, the content of the social value strategy should be independent of these, and target areas that the planning obligations do not address, to provide additionality and to complement any existing obligations. The strategy should be project specific, allowing flexibility for each development to develop a social

value strategy that is informed by its site-specific local needs analysis and consultation.

11.66 Examples of potential social value contributions, that should be project specific:

- spatial and environmental improvement works that improve health and well-being, adopt gender inclusive design, and create safer spaces;
- encouraging more local representation in Design Review Panels (including upskilling local residents to participate) – with a particular focus on underrepresented communities and groups;
- contributions (including donations, resources and staff volunteering) to local community projects that tackle poverty and the cost-of-living crisis;
- providing training and skills opportunities (including internships, work experience and graduate placements) for individuals facing barriers to employment i.e. long-term unemployed, Young People Not in Education, Employment or Training (NEETs), care leavers, ex-offenders, and residents with special educational needs and disabilities (SEND residents);
- careers and social mobility initiatives – including engaging with local schools and colleges to deliver work experience placements, career talks, and site visits for young people;
- delivering support and advice for small and independent businesses and voluntary, community and social enterprises (VCSEs) – for example, workshops on fit-out and design;
- making procurement opportunities more accessible for local small and independent businesses throughout the development lifecycle – including VCSEs and diverse business owners;

- ensuring suppliers pay London Living Wage and commit to responsible business practices;
- protecting the environment and mitigating the impacts of climate change through all aspects of the development, not just the built form – for example, by committing to encouraging active travel and using sustainable delivery methods;
- promoting positive health and well-being in the community and for employees;
- contributions (including donations, resources, and staff volunteering) to local tackling poverty initiatives, local community groups, VCSEs and charitable organisations; and
- community engagement activities to measure happiness and well-being of occupiers and people that use the development upon completion.

11.67 Part 3 of the policy sets out how social value commitments outlined in the strategy will be considered independently and as additions to complement any other planning obligations or contributions, and will be secured via a planning obligation to ensure the implementation of any approved social value strategy, requiring where appropriate that compliance with the relevant parts of the strategy is confirmed prior to the commencement and the occupation of the development.

11.68 As required in part 4 of the policy, the social value observations will be secured and monitored as part of a planning obligation. This will include monitoring and review of expected outcomes prior to, during and post construction.

London Plan policies:

- GG1 Building strong and inclusive communities
- GG3 Creating a healthy city
- GG5 Growing a good economy
- D5 Inclusive design
- D8 Public realm
- E3 Affordable workspace

Local Plan policies:

- All policies

Evidence base:

- Good Growth Principles in the London Plan

Policy DV7 Utilities and digital connectivity

1. All strategic development proposals must ensure there is sufficient utilities infrastructure capacity, (including electricity, heat, water supply, digital connectivity, and drainage) to meet demand during construction and operation. To do this, major development proposals will be expected to:

- a. engage with the Council on the content of a utilities statement which sets out the requirements for utilities and services infrastructure which are necessary to service the development;
- b. undertake engagement with utilities and service providers at the before submitting of a planning application to ensure the construction approach and end design of the development address utilities providers' requirements, and to ensure utilities networks and connections can serve the development;
- c. provide evidence of the engagement to the council, along with relevant load and consumption data and proposed routing, in a utilities statement for review and coordination; and
- d. demonstrate that the spatial, visual, amenity, and environmental impacts of new, expanded, or reconfigured utilities and services infrastructure will be avoided, remedied, or mitigated.

2. Major development proposals must prioritise connections to decarbonised heat networks to support the delivery of net zero carbon emissions solutions for clean, green, and integrated energy systems. Development with significant heat rejection, such as data centres, must be built ready to supply waste heat to a heat network, including all necessary on-site infrastructure required to facilitate a future connection.

3. Major development proposals are required to deliver Fibre To The Premises (FTTP) broadband and where possible mobile telecoms, small cell 5G and 6G digital infrastructure. A digital infrastructure statement must be submitted as part of the utilities statement to demonstrate how this will be achieved, which should:

- a. establish how FTTP will be provided to serve the development and that it will be engaged at first occupation and be of a sufficient standard to meet the requirements of future occupiers of the development; and
- b. Where required demonstrate the impact on the digital connectivity of existing residents, businesses and local communities.

4. For all other residential and employment development proposals, FTTP will be encouraged by the council as a means of expanding the local fibre network.

Supporting text

11.69 This policy seeks to ensure that new homes and developments in Tower Hamlets are supported with sufficient utilities and service infrastructure, and new developments have access to clean energy, heat, water and sewerage, mobile connectivity and fast broadband connections. Recent studies undertaken by the Tower Hamlets Infrastructure Delivery Coordination Pilots Programme (IDCPP) have found that the traditional methods of utility and services procurement are not an efficient solution with which to support new growth and development, including the decarbonisation of our energy and transport systems. Although progress has been made on improving the energy and water efficiency of new developments to better manage utilities demand, additional connections to utilities and services are still required.

11.70 Council engagement with developers has demonstrated there is a need to coordinate approaches with local utilities providers for the planning of utilities and connections. This will deliver improved efficiency for the delivery of utilities and minimise delays to developments and their utilities connections. Site utility information should therefore be shared with the council to achieve this objective.

11.71 Part 1 (a) requires that strategic development proposals submit a utility statement, which considers the relevant utilities needed to service the proposed development. The framework and contents for utility statements will be informed by the most current guidance at the time of the development proposals assessment. It is recommended that advice on the contents of the utilities statement is sought in advance of the submission of a development proposal ideally in advance of submission of a planning application or at pre-planning stage and engagement with

the council's infrastructure planning team is recommended. The scope or necessity of the components a utility statement can be determined as a result of such engagement with the Council.

11.72 Part 1(b) requires strategic development proposals to engage with utilities providers at the earliest opportunity in the design and construction process. This includes water supply, wastewater drainage and the SuDS Approval Body, electricity and energy including heat network operators, digital connectivity, and mobile communications. Development proposals should be supported by evidence of this engagement. This is to ensure there will be sufficient utilities and service capacity to meet the increased demand, and that the predicted demand increase will not impede the utilities availability for current or predicted future growth.

11.73 Part 1(c) requires strategic development proposals to submit a utility statement in line with the scope set out in Part 1(B) for assessment as part of their application, to support the coordinated delivery of utilities capacity, maximise efficient routing, and reduce the impacts of connection installations. Aggregated information from utility statements will allow early conversations with utility and service providers that inform their capacity and route planning, supporting on-time delivery and coordination and reduce disruption, which could not be achieved through applications by individual developers.

11.74 Utility statements should set out the expected demand and present evidence received from utility and service providers in the consultation that there is sufficient capacity to meet their development's as well as further projected growth needs.

11.75 As a minimum, utilities statements should include:

- location and size of existing utilities and services;
- proposed connection points routes to/from the site and site entry points;
- equipment required on and off-site to allow the connection;
- cover water, electricity and energy supplies, drainage and digital connections;
- make reference to other relevant reports and provide overview of key information, such as the drainage strategy;
- provide connection sizes, peak loads, annual demands, volumes, capacities as required for applications with each provider;
- describe function, operation and key maintenance of each item;
- provide a programme for works; and
- cover construction and occupation including phasing where applicable.

11.76 Developments which result in offsite upgrades will be subject to conditions to ensure occupation is aligned with the delivery of the required utilities infrastructure. Developments with exceptionally high utilities demands, such as data centres, must demonstrate that these requirements will not undermine the deliverability of planned homes and developments in the borough. Where this cannot be demonstrated, development proposals may be refused, or be subject to providing sufficient capacity ahead of delivery.

11.77 Part 1(d) requires applicants to demonstrate that new or expanded utilities infrastructure will not have any negative impacts to amenity or environment, such as noise, odour or vibration, or that any identified

impacts will be mitigated. Design of new utilities infrastructure should be considered, particularly where infrastructure is delivered in close proximity to existing or proposed developments, to integrate utilities into the urban landscape.

11.78 Part 2 of this policy identifies the need for new developments to connect to heat networks. All heat sources, including ambient and waste heat and significant heat rejection, present opportunities to decarbonise the borough's heating systems and achieve its net zero carbon emissions target. All new developments that emit waste heat must ensure on-site provision is made to future-proof an easy connection to future heat networks. This includes the provision of heat exchangers, thermal stores, pipework connections at the site boundary, and heat supply agreements to heat network operators. Heat network operators supplying to residential properties shall be registered participants in the Heat Trust scheme and each heat network shall be a Heat Trust registered scheme. Where existing heat networks have not decarbonized, sleeving shall be applied for the connection of new development.

11.79 In addition, a new primary electrical substation will be required on the Isle of Dogs by 2030 as identified in the Opportunity Area Framework and the Isle of Dogs Feasibility Study (Electrical Connectivity) to support ongoing development as well as the electrification of heat and transport and to reduce the pressure on the congested electrical routes currently supplying the island. This will be established on the site of a customer requiring electrical connection.

11.80 Parts 3 and 4 of this policy pertain to the delivery of digital infrastructure. Digital infrastructure plays a vital role in our daily lives which enables people to access the connectivity and services they

need where they live, work or travel. The council considers that digital infrastructure, including the delivery of Fibre To The Premises (FTTP) (also called full fibre gigabit broadband), existing 4G and 5G mobile telecoms and future wireless technologies including 6G, to be essential infrastructure to support the delivery of sustainable development. Part R1 of the Building Regulations 2010 requires buildings to be equipped with at least 30 MB/s ready in-building physical infrastructure, however new developments using full fibre to the property or other higher-grade infrastructure can achieve connectivity speeds of 1GB/s. Developers should engage early with a range of network operators, to ensure that development proposals are designed to be capable of providing this level of connectivity to all end users. Mechanisms should also be put in place to enable further future infrastructure upgrades. Innovation is driving reductions in the size of infrastructure, with marginal additional unit costs, but greater digital connectivity is needed in more locations.

11.81 This policy seeks to ensure that development proposals provide the necessary standards and do not have a negative impact on digital connectivity within the borough for existing residents and local people, as well as future occupiers. As well as achieve national ambitions to deliver gigabit broadband to at least 99% of premises nationwide and coverage of standalone 5G to all populated areas of the UK by 2030.

11.82 Further guidance on delivering digital infrastructure is set out in the Tower Hamlets Digital Infrastructure Strategy (2022) and the GLA Sub-regional Digital Strategy (emerging). Development proposals should consider the most up-to-date digital and utility guidance published by the council at the time of their assessment.

London Plan policies:

- S13 Energy infrastructure
- S15 Water infrastructure
- S16 Digital infrastructure

Local Plan policies:

- All policies

Evidence base

- Proposals for heat network zoning, 2022
- London Heat Network Manual II, 2021
- Sub-regional Integrated Water Management Strategy (SWIMS) for East London, 2023
- Isle of Dogs and South Poplar Integrated Water Management Plan (IWMP), 2020
- Isle of Dogs, South Poplar and Leaside Local Area Energy Plan, 2022
- Tower Hamlets Surface Water Integrated Management Strategy
- Isle of Dogs and South Poplar Opportunity Area Framework, 2019
- Isle of Dogs Feasibility Study (Electricity Connectivity), UKPN, 2023
- UK Digital Strategy, 2022
- Sub-regional Digital Strategy
- Digital Infrastructure Strategy and Action Plan: Isle of Dogs, South Poplar, and Lower Leaside Areas, 2022
- Utilities and Heat Network Topic Paper, 2024
- Foul Sewerage and Utilities Statement

Policy DV8 Site allocations

1. Development proposals on site allocations should meet the following requirements:
 - a. apply all Local Plan policy requirements unless specified through the site allocation text;
 - b. deliver required infrastructure on earlier phases of development as far as possible;
 - c. open discussions with the council at the earliest possible opportunity, where CIL-in-kind is sought in exchange for the delivery of strategic infrastructure, to determine what kinds of infrastructure will be granted CIL-in-kind on the site;
 - d. provide new publicly accessible open space of at least 0.4ha, and where family housing on allocations is delivered, it should be delivered in close proximity to the open space;
 - e. where strategic publicly accessible open spaces are required in the site allocation text, they must consist of at least 1 hectare of contiguous open space, and must be additional to other local plan open space requirements;
 - f. provide a buffer zone of 8m to fluvial watercourses and 16m to tidal watercourses; and
 - g. on sites with decommissioned gasholders, the space taken up by the gasholders is not considered to be employment space, and so employment floorspace does not need to be re-provided as part of redevelopment for this floorspace.

Supporting text

11.83 This policy sets out some requirements that apply to all of the site allocations included in the plan.

11.84 Part 1(a) specifies that the local plan must be read as a whole, and allocations should not be treated as isolated sets of requirements that sit outside of the other planning policies in this document. For reasons of efficiency, the site allocations do not set out standard requirements relating to issues like the delivery of affordable housing, biodiversity improvements, the improvement of air quality, or many other topics covered in the local plan policies – these requirements should be assumed to apply unless the site allocation text specifies that they do not.

11.85 The site allocations set out required infrastructure that must be delivered to make a development acceptable, and part 1(b) emphasises that the delivery of this infrastructure, including sustainable transport improvements, should be focused on the earlier phases of delivery where possible. It is accepted that not all infrastructure will be able to come forward at the very start of development, but there should be a general principle that the delivery of infrastructure is front-loaded to ensure that the needs of the community will be met as new residents move into a development.

11.86 Part 1(c) sets out the council's approach to the delivery of social infrastructure such as health, educational, and community facilities on site allocations. The site allocations in this plan will be delivered over a long period of time, and it is possible that needs which are forecast at the time of preparing the plan may not materialise over the fifteen years of the plan period. This can particularly be the case for schools, where future pupil numbers and demographic trends can be difficult



to accurately predict. The council has therefore taken a precautionary approach to allocating social infrastructure in this plan, and when applications for development on site allocations come forward discussions should be held with the council at the earliest possible opportunity to determine whether the social infrastructure needs have changed since the time when the plan was prepared. In some cases, it may prove that a particular piece of social infrastructure is no longer needed, but the need for another kind of infrastructure has increased and this can be delivered instead. In other cases, it may be that there is no further need for social infrastructure on a particular site, and

alternative uses can be considered. This will need to be assessed on a site-by-site basis, which is why developers are encouraged to begin early discussions around this.

11.87 Part 1(d) sets out that all site allocations in the plan are expected to deliver some new publicly accessible open space. Some site allocations specify that a strategic open space should be delivered, and this is elaborated in part 1(e). For allocations that do not specify the need for a strategic open space, publicly accessible open spaces that meet local needs should be delivered instead, with a target of delivering at least 0.4 hectares across the site (it is acknowledged that on smaller allocations this level may not be achievable, however some amount of new publicly accessible open space is expected to be provided and discussions should be opened with the council at the earliest opportunity to discuss this). In all cases, family housing within site allocations should be delivered in close proximity to publicly accessible open space.

11.88 Part 1(e) explains that for publicly accessible open space to count as strategic infrastructure (and therefore to meet the requirements of site allocations that include open space as required infrastructure, and to potentially be liable for CIL-in-kind), it must consist of at least 1 hectare of contiguous open space. Smaller, non-contiguous open spaces, even where they add up to a total of 1 hectare across a site, will only be considered to meet local needs for open space, not strategic needs. This applies even where such spaces are claimed to be connected via green routes or pedestrianised pathways. All publicly accessible open space should be additional to other open space requirements in the Local Plan, such as communal amenity space and play space requirements – spaces that are counted towards the required total of communal amenity space or children’s play space

cannot also be counted towards the provision of new publicly accessible open space.

11.89 Development which is in proximity to watercourses must incorporate buffer zones to support the incorporation of flood risk management into development proposals.

11.90 There are some site allocations that contain decommissioned gasholders, and part 1(g) specifies that the floorspace taken up by the gasholders is not considered to count as employment space for the purposes of policy EG4, and therefore there is no expectation that this floorspace needs to be re-provided as an employment use in any redevelopment. Any other existing employment use on such sites will still need to be re-provided.

11.91 In addition to these requirements, it should be noted that some of the site allocations in the Leaside sub-area originated in the London Legacy Development Corporation Local Plan. As part of the process of developing this local plan, the requirements for these sites and any adopted guidance related to them will be reviewed and may be updated.

London Plan policies:

- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- G4 Open space
- SI 12 Flood risk management

Local Plan policies:

- All policies

Evidence base:

- Optimising Site Capacity: A Design-led Approach LPG, 2023

12. Homes for the community



HF1 – Meeting housing needs

HF2 – Affordable housing and housing mix

HF3 – Protection of existing housing

HF4 – Supported and specialist housing and housing for older people

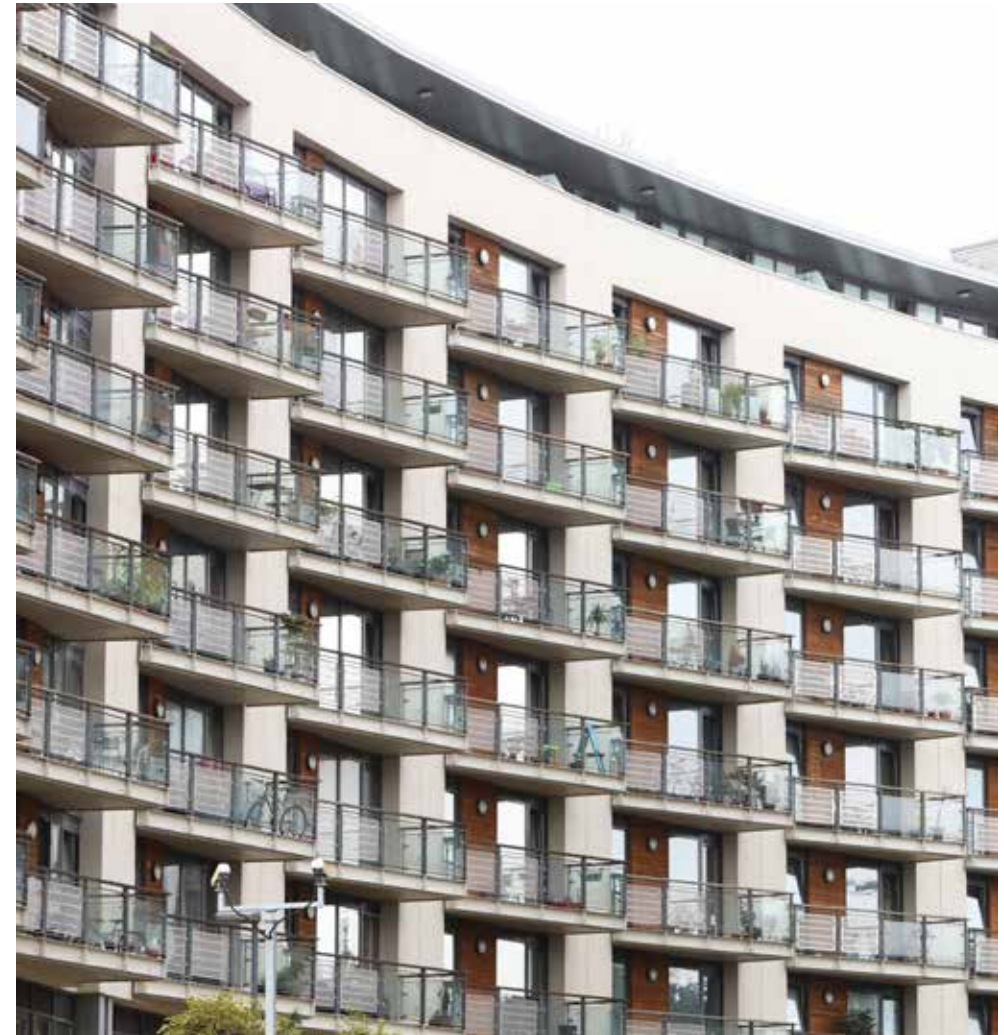
HF5 – Gypsy and traveller accommodation

HF6 – Purpose-built student accommodation

HF7 – Large-scale purpose-built shared living

HF8 – Housing with shared facilities (houses in multiple occupation)

HF9 – Housing standards and quality



Introduction

12.1 Tower Hamlets is facing an acute housing shortage, with a particular lack of social rented homes to meet the needs of local residents. This leads to overcrowding, as residents are unable to move into their own accommodation and need to live with family, friends, or shared homes even when these circumstances lead to health and well-being issues.

12.2 The borough's strategic ambition is to ensure that everyone in Tower Hamlets lives in a good quality home that they can afford. To meet this need, this plan seeks to enable the delivery of an ambitious number of new homes, with a focus on larger, family-sized social rented homes, as this has been identified as the area of most acute need. This chapter sets out the policies that will support the borough in meeting these needs.

12.3 In addition to increasing the overall supply of new homes in the borough, there is also an acute need to ensure that all homes are of a good quality and meet the needs of their residents. This chapter includes policies that support the development of good quality homes that meet the needs of a wide variety of residents. It also supports the development of specialist housing that supports the needs of particular groups, such as older residents, those with special needs, and those experiencing homelessness. To meet this need, Policy HF2 imposes a requirement for development proposals to provide affordable housing, with rates varying depending on the nature of the development.

12.4 All parts of the borough are expected to experience redevelopment or intensification to increase densities in recognition of the substantial need for new housing. The areas with the greatest identified opportunities for growth are the areas designated as Opportunity Areas in the London Plan:

- a. Isle of Dogs and South Poplar sub-area: the places of Canary Wharf, Blackwall, Leamouth, and northern parts of Millwall and Cubitt Town;
- b. City Fringe sub-area: the places of Whitechapel, Wapping, and Aldgate; and
- c. Leaside sub-area: the places of Poplar Riverside and Poplar, and the area of the LLDC which sits within Tower Hamlets.

12.5 Additionally, significant opportunities exist outside of these areas, which this plan seeks to harness.

Policy HF1 Meeting housing needs

1. The council will secure the delivery of at least 52,095 new homes across the borough between 2023-2038. This will be achieved through:
 - a. promoting the delivery of new housing in locations across the borough, particularly within the borough's opportunity areas, highly accessible locations, and site allocations (as shown on the policies map);
 - b. supporting new housing delivery on sites below 0.25 hectares (small sites) in size;
 - c. supporting new housing delivery on windfall sites (land not allocated within the Local Plan);
 - d. supporting estate regeneration schemes;
 - e. supporting proposals that would bring back into use long-term empty homes and derelict empty homes; and
 - f. supporting development proposals for housing as a
2. The council will prioritise the delivery of affordable homes across the borough and require developments to contribute towards the creation of sustainable, mixed, and inclusive communities that respond to local and strategic need. This will be achieved through:
 - a. securing affordable homes from all residential development proposals; and
 - b. requiring a mix of unit sizes and tenures to meet local need on all sites providing new homes.

3. The council will prioritise the delivery of self-contained (Class C3) homes in new residential developments when assessing development proposals for non C3 forms of housing.
4. Where they can deliver on the requirements of part 2 of this policy, the council will support development proposals which seek to meet the needs of specific groups:
 - a. families with children;
 - b. for those who rent their homes;
 - c. older people;
 - d. key workers and service families;
 - e. communities seeking to commission or build their own homes; and
 - f. students in appropriate locations.
5. The council will support development proposals that meet the needs of:
 - a. Disabled and vulnerable residents and those who need specialist housing;
 - b. Gypsy and Traveller communities; and
 - c. Emergency accommodation.
6. The council will expect residential development proposals to be of a high quality, sustainable, and take appropriate account of cumulative development.

Supporting text

12.6 Part 1 of this policy sets out the strategic housing targets¹ for Tower Hamlets as well as our objectives of ensuring the creation of mixed and inclusive communities, sustainable places, and quality living environments within the borough.

12.7 The borough's housing target relates to total net housing supply. The strategic target is composed of the housing supply target of at least 34,730 new homes between 2019/2020 and 2028/2029 – established in policy H1 Increasing housing supply of the London Plan (GLA, 2021) – with the period beyond this being informed by the later phases of London Plan Strategic Housing Land Availability Assessment (SHLAA) 2018. The target includes self-contained residential units and non-self-contained residential accommodation, including specialist housing for older people, people with specialist care needs and students in use Classes C2, C3 and C4 or sui generis.

12.8 A proportion of the London Legacy Development Corporation's housing target as set by the London Plan 2021 is located within the boundary of Tower Hamlets. The delivery of this proportion will be supported through the adoption of the LLDC's site allocations in the Tower Hamlets Local Plan, extant masterplans and planning permissions.

12.9 Significant housing growth opportunities are identified in the locations specified in Part 1(a),² supported by capacity assessments of allocated sites. The borough's limited area requires optimising deliverable capacity in other locations across the borough. This will be achieved through a number of different mechanisms: the regeneration of previously developed land, the intensification of the built form in



opportunity areas, windfall developments, the delivery of small sites and appropriate development in highly accessible locations along transport corridors.

12.10 Part 1(b-e) supports the delivery of housing through town centre intensification, estate regeneration, and infill development on sites less than 0.25 hectares, bringing back long-term vacant properties into residential use and the development of windfall sites.

¹ Housing Land Supply Topic Paper

² Allocated sites and opportunity areas

12.11 Part 1 (d) acknowledges that the regeneration of existing housing estates will play a role in delivering the homes the borough needs. Such regeneration should not only seek to deliver an increased number of new affordable homes but to result in improved and expanded social facilities, enhancement of environmental amenity, open space and public realm that responds to the resulting increase in demand generated by the increased number of residents in the regenerated estate. Such schemes should be guided by the Council's Estate Regeneration Pathway and engage early in the design process with the Council's regeneration team.

12.12 Part 1(e) recognises that the borough contains a stock of vacant and derelict homes. In order to meet housing needs, it will be essential to bring these homes back into use. Grants are available from the council to allow owners to carry out works to homes to bring them back into use, and council tax penalties are imposed on homes that have been left empty for more than two years.

12.13 Part 1(f) regarding housing as a temporary meanwhile use, will be supported in locations which are appropriate for residential development and meet the requirements of all applicable policies. The temporary use of land for residential purposes is supported by London Plan Policy H3 Meanwhile use as housing. It is expected that such developments will be time limited to ensure that the long-term intended use of a site is ultimately delivered.

12.14 Part 2 sets out how development proposals should create mixed and inclusive communities through providing affordable housing and a range of different sized homes, with a focus on addressing overcrowding in the borough through delivering family/larger sized affordable (social) units as part of all developments.

12.15 Part 3 recognises that the acute need for more standard C3 housing in the borough means that the supply of this type of housing will normally be prioritised over other types of housing such as purpose-built student accommodation and large-scale purpose-built shared living. These types of housing are addressed in more detail in policies HF6 and HF7 respectively.

12.16 Part 4 recognises our duty to create a policy framework to enable the quality delivery of homes for families with children, those who rent their homes, older people, key workers and service families, and students. This will be achieved through working with partners to facilitate the appropriate quantity and quality of housing and ensuring that it provides affordable housing in accordance with Part 2.

12.17 Part 4(e), in line with the requirements of paragraph 62 of the NPPF, establishes support for those who wish to build their own home. The current self-build register indicates there is interest in self-build in the borough, however high local land values and housing targets are resulting in the predominance of flatted developments which limits opportunities for viable self-build. Group self-build has the best potential to deliver significant additional housing output in higher cost areas. We would therefore encourage group self-build as a more viable model of self-build in the borough.

12.18 Part 5 recognises that the borough has a duty to support the development of housing that meets the needs of disabled and vulnerable residents and the Gypsy and Traveller communities. Part 5 (a) considers specialist housing which meets the needs of disabled and vulnerable residents and how such developments should be integrated into the wider area through careful design and the sharing/joint use of facilities thus encouraging a sense of community belonging and social

interaction, where applicable. The Council's Housing with Care Strategy and the London Plan establish the need for those elderly residents with additional support needs.

12.19 Part 5 (b) Gypsy and Traveller accommodation need will be secured through safeguarding the existing Gypsy and Traveller site at Old Willow Close and seeking to deliver additional safeguarded pitches adjacent to the site. Additional support is offered through policy HF5 Gypsy and Traveller accommodation which sets out a framework for further sites to come forward.

12.20 Part 5 (c) acknowledges the need for emergency accommodation which will provide accommodation for the most vulnerable members of our communities such as those who find themselves homeless.

12.21 Part 6 requires development proposals to appropriately respond to the character of the surrounding area and site-specific constraints, as well as provide a high-quality living environment taking account of the relevant London Plan Guidance and London Borough of Tower Hamlets SPDs. Further design guidance is provided in the People Places and Spaces policies.

London Plan policies:

- Policy H1 Increasing housing supply
- Policy H2 Small sites
- Policy H3 Meanwhile use as housing

Local Plan policies:

- HF2 Affordable housing and housing mix
- HF3 Protection of existing housing
- HF4 Supported and specialist housing
- HF5 Gypsy and traveller accommodation
- HF6 Purpose-built student accommodation
- HF7 Large-scale purpose-built shared living
- HF8 Housing with shared facilities (houses in multiple occupation)
- HF9 Housing standards and quality

Evidence base:

- Tower Hamlets Local Housing Need Assessment, 2023
- Strategic Housing Land Availability Assessment, 2017
- London Legacy Development Corporation Local Plan, 2020
- Tower Hamlets Tackling Overcrowding
- Housing Design Standards LPG, 2023
- Housing SPG, 2023
- High Density Living SPD, 2023
- Housing with Care Strategy (LBTH, 2024)

Policy HF2 Affordable housing and housing mix

1. Development proposals will be required to optimise the delivery of affordable homes on-site and contribute to the London Plan and Tower Hamlets strategic target for 50% of all new homes to be affordable.

Residential development proposals must:

- a. provide a financial contribution for affordable homes on sites delivering 2 to 9 new residential;
- b. deliver a minimum of 40% affordable housing (by habitable room) on-site when seeking to provide 10 or more new residential units;
- c. deliver a minimum of 50% affordable housing (by habitable room) on-site through the redevelopment of affordable housing, estate regeneration schemes and industrial land for residential use; and
- d. deliver the required amount of affordable homes in accordance with a 85% social homes and 15% intermediate homes tenure split.

2. Development proposals that do not deliver the required amount of affordable housing, tenure, or unit mix, or proposals that do not accord with other relevant policies of the Local Plan, will be subject to viability testing to derive the maximum viable level of affordable housing.

3. Development proposals for phased residential development must prioritise the early delivery of affordable housing. They must demonstrate how family-sized homes and affordable housing will be provided across all phases and must be considered cumulatively as each phase progresses.

4. Development proposals seeking to deliver off-site affordable homes will not be supported, unless it can be robustly demonstrated that:

- a. there would be a minimum of 50% (by habitable room) affordable housing overall;
- b. a higher proportion of (low-cost) social rented family-sized homes would be delivered;
- c. a higher quality of built environment can be provided both off-site and on-site, through the delivery of public realm, green spaces, play spaces, and community facilities;
- d. there would be no over-concentration of one type of housing, allowing mixed and inclusive communities to be delivered both off-site and on-site with a mix of tenures and unit sizes;
- e. the location of the off-site affordable housing allows the same level of accessibility to local infrastructure and services that would be provided for housing delivered on-site.
- f. the off-site location would not otherwise deliver housing and affordable housing.

5. Development proposals seeking to provide a payment in lieu affordable housing contribution will not be supported unless it can be robustly demonstrated that:

- a. exceptional circumstances apply;
- b. a suitable off-site location cannot be found for the delivery of affordable homes; and
- c. the contribution would secure a higher level of affordable housing provision than the council's 50% strategic target.

6. Affordable housing contributions for amendments to extant permissions will be calculated on the basis of the total number of dwellings of the overall amended development proposal.

7. Affordable housing contributions relating to development proposals for additional housing supported by existing development will be calculated on the basis of the additional component of development.

8. Development proposals are required to deliver a mix of unit sizes in accordance with local housing need, outlined in the table 1:

Table 1: Housing mix

Housing mix	1-bedroom	2-bedroom	3-bedroom	4-bedroom
Affordable housing (rented)	15%	20%	40%	25%

Development proposals for market units should provide a healthy mix of units (at least 15% 3 bed+). Development proposals with an over-reliance on studios and/or one-bedroom units will be resisted. The housing mix in intermediate units should take account of the requirements set out in the London Plan, associated guidance, as well as the LBTH Local Housing Needs Assessment to ensure products will meet an identified need.

9. Schemes that include the demolition of existing affordable housing must:

- a. replace the existing affordable housing with equivalent floorspace and the same housing tenure(s).
- b. seek to achieve an overall uplift in affordable housing by delivering a minimum of 50% affordable homes (by habitable room) in the final development or a minimum of 35% affordable homes (by habitable room) will be delivered within the uplift, whichever is the greater. In either case development proposals will need to meet the council's preferred tenure split within the affordable units.

Supporting text

12.22 Tower Hamlets faces an acute housing need – in particular for low cost rented family housing – a need which is replicated across London. In addition, LBTH faces considerable challenges in delivering homes which are affordable to local people on average incomes, who are unable to access social housing or afford market housing, particularly if they have children³.

12.23 Part 1 sets a strategic target of achieving 50% affordable homes through private development, developments by Registered Providers, the third sector, community led projects, as well as council-led initiatives. This target is considered to best reflect local housing need as evidenced in the Local Housing Need Assessment and the Housing with Care Strategy.

12.24 Part 1(a) sets out that development proposals for between 2 and 9 additional residential units will be required to provide a financial contribution to the development of affordable housing.

12.25 Part 1(b) sets out that on development proposals for 10 or more residential units, at least 40% affordable housing is expected.

12.26 Further details are set out in Appendix 2 Financial Contribution Calculation Methodologies and the borough's Planning Obligations Supplementary Planning Document.

12.27 Part 1(c) expects development proposals on public land or designated industrial land, or delivered as part of the redevelopment of existing affordable housing or an estate regeneration scheme to provide at least 50% affordable housing.

12.28 The affordable housing provision, as per Part 1(d) should be comprised of:

12.29 a. 85% low cost rented element, of which 50% should be affordable rental products and the remaining to be other social rent products as agreed with the council (social rent will also be accepted particularly where this enables schemes to access grant); and

12.30 b. 15% intermediate element, which can include London living rent, shared ownership, and other intermediate products (where supported by the council).

12.31 Affordable rental products are to be inclusive of service charges in order to ensure new homes are genuinely affordable for those on low incomes. In suitable locations a component of affordable housing can be provided as Specialist Housing to meet need identified for those with additional care need in line with the Council's Housing with Care Strategy.

12.32 In addition to the requirements in Part 1, developments are expected to maximise the provision of affordable housing, having regard to availability of public subsidy, implications of long term or phased development (including provision for re-appraising scheme viability at different stages of development) as well as financial viability which should, in particular, take account of prevailing local and regional viability guidance.

12.33 The requirements of Part 1 apply to all types of housing falling into use Class C3, including Build-to-Rent accommodation. Other types of housing, including student housing, large-scale purpose-built

³ These needs have been identified through the Tower Hamlets Local Housing Need Assessment, which sets out the housing requirements arising from expected population growth

shared-living and specialist and supported housing are addressed in the relevant policies in this chapter and will include different affordable housing requirements.

12.34 Levels of affordable housing lower than those set out in Part 1 will only be accepted where robustly justified through viability evidence and where it is demonstrated that there are clear barriers to delivery. Applications that do not meet policy requirements will be subject to viability reviews. Further guidance is provided in the Borough's Development Viability SPD and the Viability and Affordable Housing SPG (GLA, 2017).

12.35 Where the development provides more than the minimum level of affordable housing required in Part 1, the tenure of the additional affordable homes will be subject to negotiation. GLA developed products (including the London Affordable Rent and London Living Rent) may be subject to change over the plan period. Our affordable housing service will provide further guidance on suitable products when assessing applications. Rent levels are determined as part of the viability assessment of each planning application and undertakings are made to retain similar rent levels at the point of completion. The ownership of affordable homes must be transferred to one of our approved local registered providers or other approved affordable housing providers.

12.36 The provision of affordable housing will be calculated using habitable rooms as it ensures the provision of a range of housing sizes more likely to meet the needs identified in the latest housing needs assessment. Any variation on aggregate floorspace across both bedroom mix and tenure should be presented in the accommodation schedule.

12.37 Part 4 expects affordable housing to be delivered on-site. This is important in promoting mixed and inclusive communities. In exceptional circumstances, specific site constraints may require that affordable housing is provided off-site or through payments in lieu. These cases give rise to particular policy requirements to maximise the provision of affordable housing. Payments in lieu towards affordable housing will be secured by planning obligation.

12.38 Part 4(e) requires off-site affordable housing contributions to allow the same level of accessibility to local infrastructure and services as if they were delivered on-site. Development proposals will be required to demonstrate this through submitting a detailed comparison of available infrastructure on-site and with the off-site location and should include as a minimum an assessment of: Public Transport Accessibility Level (PTAL) scores, availability, proximity, and capacity of services such as medical centres, retail, and community facilities.

12.39 Part 5 expects development proposals that include cash in lieu contributions for affordable housing to provide evidence demonstrating that exceptional circumstances in relation to the site or nature of the development would not allow the delivery of the full amount of affordable housing on-site and that all opportunities for off-site development have been investigated and found unfeasible. In order to off-set the harm caused by not delivering affordable housing on-site, development proposals that include a robustly justified cash-in-lieu contribution to affordable housing are expected to provide a payment that amounts to more than 50% affordable housing across the development.

12.40 Part 6 seeks to ensure that affordable housing contributions sought through Minor Material Amendments (MMA) (S73 applications)

reflect the full scale of the overall development, rather than the uplift proposed in the MMA application. In development proposals for the construction of additions or extensions that result in new dwellings being added to existing buildings, an affordable housing contribution will be sought based on the number of new dwellings being proposed.

12.41 Part 7 of the policy reflects the particularly high need for larger, family-sized units in the affordable rental tenure. This is to address an urgent need for larger units to combat the impacts of overcrowding, and may be reviewed later in the plan period. While a unit mix is not prescribed for market and intermediate dwellings, there should be a healthy mix (at least 15% 3 bed+ units), and developments weighted towards studios and one-bedroom units in these tenures will be resisted

12.42 Part 8(a) recognises that, given the high level of need for affordable housing in Tower Hamlets, proposals that include the demolition of affordable housing must ensure that there is no net loss of affordable housing. This should be measured by floorspace rather than by unit numbers or habitable rooms to take account of the fact that older housing estates may contain units that are larger than those required under current planning policies, and to ensure that there is no reduction in real terms.

12.43 Part 8(b) expects proposals for the redevelopment of existing affordable housing to provide either 40% affordable housing on the uplift in habitable rooms, or 50% overall, whichever results in the higher amount of affordable housing by habitable rooms. In both cases, proposals will be expected to meet the council's preferred tenure split as set out in Policy HF2. It should be noted that estate regeneration proposals are not eligible for the London Plan's Fast Track approach to affordable housing and will have to provide viability testing.

London Plan policies:

- H2 Small sites
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H8 Loss of existing housing and estate regeneration
- H12 Supported and specialist housing

Local Plan policies:

- DV1 Areas of growth and opportunity within Tower Hamlets
- DV2 Delivering sustainable growth in Tower Hamlets
- DV5 Developer contributions
- DV6 Social value
- HF1 Meeting Housing Needs

Evidence base:

- Development Viability SPD, 2017
- Viability and Affordable Housing SPG, 2017
- Local Housing Need Assessment (LBTH, 2023)
- Housing with Care Strategy (LBTH, 2024)

Policy HF3 Protection of existing housing

1. Development proposals resulting in the net loss of residential floorspace, self-contained homes, or family-sized homes will not be supported.
2. Development proposals which compromise the supply of self-contained housing will not be supported – in particular family homes.
3. Development proposals which involve the conversion, subdivision, or amalgamation of individual or multiple family homes will only be supported where there is no net loss of family-sized dwellings (3-plus bedroom units). The retained family unit should have access to private external amenity space.

Supporting text

12.44 Policy HF3 seeks to protect existing and safeguard the future supply of self-contained homes across the borough. To meet the housing need of Tower Hamlets over the plan period we must ensure that the supply of self-contained homes and in particular family-sized homes is maintained.

12.45 Part 1 seeks to ensure that there is no net loss of existing residential floorspace through development in the borough. This is to ensure we meet identified local need as well as strategic targets for housing. Family housing requires particular protection, due to high levels of identified need.⁴

12.46 Part 2 seeks to protect existing and safeguard the future supply of self-contained housing. This is to ensure we meet identified local need as well as strategic targets for housing. Development for non-self-

⁴ Local Housing Need Assessment

contained units will not be supported where it utilises land identified for self-contained housing through a current planning permission, or through the borough's development plan. It is recognised that other policies in this plan identify suitable locations for other land uses. Developments of other land uses, where supported by policy and/or site allocations, are not considered to undermine the supply of self-contained units. Family housing requires particular protection, due to high levels of identified need.

12.47 In order to manage the current shortage of family homes (three or more bedrooms), part 3 ensures that proposals to convert family homes into smaller self-contained flats will be resisted, unless the conversion enables the retention of a family unit (3-plus bedrooms). Where possible, the family-sized unit should have access to external amenity space.

London Plan policies:

- H8 Loss of existing housing and estate redevelopment
- Hg Ensuring best use of stock

Local Plan policies

- HF1 Meeting housing needs
- HF4 Supported and specialist housing
- HFg Housing standards and quality

Evidence base:

- Good practice guide to estate regeneration, 2016
- Housing SPG, 2016

Policy HF4 Supported and specialist housing and housing for older people

1. Development proposals for new specialist and supported housing and housing for older people will be supported in principle where it can be demonstrated that it:
 - a. is of high quality, considers the needs of intended occupiers, and meets relevant best practice guidance for this form of accommodation;
 - b. integrates residents into the surrounding community;
 - c. is located in close proximity to public transport, community facilities, local shops and services;
 - d. includes amenity and accommodation facilities for staff where necessary;
 - e. includes provision of affordable units, where appropriate; and
 - f. provides an appropriately detailed and resourced management plan.
2. Where practical, development proposals for new housing for elderly people should deliver small-scale community facilities or town centre uses that allow for interaction between residents and the local community in suitable locations and where supported by council commissioning teams.

3. Existing specialist and supported housing and housing for elderly people will be protected where it is considered suitable for its use and meets relevant standards for this form of accommodation.
4. The redevelopment of any site which includes specialist and supported housing and housing for older people is only considered acceptable where the existing provision is considered to be of low quality, a decanting strategy is provided, and:
 - a. it has been demonstrated that there is no longer an identified need for its retention in the current format;
 - b. the needs met by this form of housing will be re-provided elsewhere within the borough, resulting in no net loss of provision and is both available and affordable; or
 - c. re-provision as part of the development proposal would result in improved standards and quality of accommodation and the accommodation would be re-provided at comparable rent levels.

Supporting text

12.48 This policy aims to ensure that there is a sufficient supply of appropriate housing available for people with specialist care needs, older people, homeless people, disabled people, and vulnerable people to live as independently as possible in accordance with our statutory duties. It also seeks to protect appropriate staff accommodation ancillary to a relevant use.

12.49 The Tower Hamlets Housing Strategy (2016-2021) and the draft Housing and Care Strategy 2024 seek to support the delivery of more choice so that development meets a wide range of housing needs. The London Plan provides an indicative benchmark for specialist housing for older people. The benchmark for Tower Hamlets is 45 units a year. Further need for both supported and specialist housing and housing for older people is set out in the Local Housing Need Assessment 2023.

12.50 Examples of specialist housing include:

- sheltered housing – commonly self-contained homes with limited on-site support (usually within use Class C3);
- residential care homes – commonly bedsit rooms with shared lounges and eating arrangements (within use Class C2);
- nursing homes – similar to residential care, but accommodating ill or frail elderly people, and staffed by qualified nursing staff (also within use Class C2);
- dual-registered care homes – residential care homes where nursing care is provided for those residents who need it (also within use Class C2);
- extra-care homes – combinations of the above providing independent living alongside care and support, and sometimes also offering support for older people in the wider community;

- homeless shelters and transitional housing for those experiencing homelessness (sui generis use, C2 use or C3 use depending on the nature of the facility); and
- staff accommodation ancillary to a relevant use.

12.51 In order for development proposals to be considered high-quality in accordance with Part 1(a) they must provide a high-quality living environment both internally and externally. Internal proposals should include components such as, but not limited to, suitably sized kitchens, bathrooms, laundry facilities, lounges, and external amenity spaces. Developments must also consider the needs of the intended occupiers. Advice on how to suitably consider occupiers with additional support needs can be sought from the council's housing and adult health service teams.

12.52 In accordance with Part 1(b), opportunities to integrate the development into the wider area should also be explored to encourage a sense of belonging (especially among people from different generations) as well as to protect against the health impacts of loneliness and isolation. This expectation should inform the layout of the development and the design of associated public realm.

12.53 In accordance with Part 1(c), development proposals must demonstrate that they are accessible in terms of location and individual mobility needs. Close proximity to local services is considered to be a walkable distance of no more than 10 to 15 minutes. Where appropriate, the proposed scheme should provide necessary storage for mobility scooters and wheelchairs, where relevant, and provide pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances. The particular locational needs of facilities will vary according to the intended residents and their levels of mobility. Where mobility is limited, development proposals



should be located within 5 minutes walking distance of local shops, services, community facilities, and public transport to ensure that residents can continue to participate in their local community.

12.54 Part 1 (d) sets out the need for staff facilities at specialist housing developments. Such developments may require 24-hour care and therefore staff being present on site for extended periods of time. Facilities such as break spaces, changing rooms, showers, toilets and even rest spaces for overnight should be considered.

12.55 Part 1(e) requires that development proposals include provision of affordable housing. This requirement will vary based on the nature of the proposal. All development proposals for C3 housing will be required to provide affordable housing in accordance with Policy HF2. While non-C3 housing should also provide affordable accommodation, it is recognised that, due to the particular costs or nature of a facility, it may not be possible to provide the amount of affordable housing required by Policy HF2. In these cases, development proposals should demonstrate that they are providing the maximum viable amount of affordable housing. It should be noted that specialist older persons housing is eligible for the London Plan's Fast Track Route for the provision of affordable housing; other types of specialist housing are excluded from the fast-track approach and typically take bespoke approaches to the provision of affordable housing.

12.56 Part 1(f) requires that development proposals for specialist or supported accommodation provide a management plan. If the proposed facility is new and not yet operational, the applicant should set out which local authorities or charities the provider will be working with and seek agreement with the council as to the percentage of occupiers that will be existing Tower Hamlets residents. Management plans should demonstrate the residential population mix and other management practices that minimise safeguarding risks, maximise opportunities to create and sustain social networks and access appropriate support, and ensure that the development minimises amenity impacts. Management plans should also include details of numbers of staff on site and staff routines, how residents will be placed within the accommodation, the level of care provided, how resident independence would be sustained, expected comings and goings, safeguarding practices, health and

safety procedures and the maintenance of the accommodation and any communal spaces provided.

12.57 Part 2 seeks to incorporate, where practical, small-scale community and town centre uses within the development proposal. Such components can improve the health and well-being of residents as they offer opportunity to play and active role in their community through continued interaction and stimulation with the surrounding existing and wider community.

12.58 Part 3 sets out that existing accommodation will be protected where it is considered suitable and meeting the needs and standards required.

12.59 Part 4 provides criteria for the assessment of development proposals that include the redevelopment of specialist housing. In order to comply with these criteria, development proposals will need to demonstrate that they have consulted with council commissioning teams and external providers to demonstrate that (a) there is no longer an identified need for the existing facility in its current format, taking account of impacts that consented developments may have on the supply of this type of facility; (b) the needs met by this form of housing will be re-provided elsewhere in the borough, resulting in no net loss of provision and that the proposed space is both available and affordable – in this case, an existing facility should be identified that is able to accommodate the existing need without placing any additional pressure on the facility or compromising the ability of the borough to meet future needs for this type of facility; or (c) the facility will be re-provided as part of the development proposal with improved standard of accommodation and at comparable rent levels to the existing facility – in this case, development proposals will need to submit a decanting

plan to show how disruption to existing residents will be minimised and prioritising a single permanent move over a move to a temporary facility and a move to the re-provided facility.

12.60 All proposals for specialist and supported housing and housing for older people will be referred to our adult health service to consider the approach to safeguarding, and ensure that a good quality service can be provided to vulnerable people.

London Plan policies:

- H12 Supported and specialised accommodation
- H13 Specialist and older persons housing

Local Plan policies:

- DV5 Developer contributions
- H2 Affordable housing and housing mix
- PS4 Attractive streets, spaces and public realm
- PS5 Gender inclusive design

Evidence base:

- Tower Hamlets Local Housing Need Assessment, 2023
- Tower Hamlets Local Housing Strategy
- Tower Hamlets Housing and Care Strategy

Policy HF5 Gypsy and Traveller accommodation

1. Accommodation for the Gypsy and Traveller community will be secured through safeguarding the existing Gypsy and Traveller site at Old Willow Close, seeking to deliver additional safeguarded pitches adjacent to the site and development proposals at suitable locations.
2. Development proposals for Gypsy and Traveller accommodation will be supported in principle, where it can be demonstrated that:
 - a. the proposed site is suitable for housing and in an accessible, safe location;
 - b. the proposal employs high-quality design and is sympathetic to local character and heritage;
 - c. the proposal maintains and enhances the quality of the environment and residential amenity; and
 - d. the site is not located in an area of high flood risk (flood zone 3).

Supporting text

12.61 This policy safeguards the existing Gypsy and Traveller site at Old Willow Close and securing any new pitches that arise as a result of the completion of the Elizabeth line at Old Willow Close. Should there be need for additional accommodation identified through the Greater London Authority Gypsy and Traveller Accommodation Need Assessment, development proposals which meet this need will be considered against the criteria set out above and in line with government guidance.

12.62 This policy aims to ensure that new Gypsy and Traveller sites are well integrated into their surroundings and respect the interests of existing settled communities. Any new provision should be prioritised for permanent facilities, rather than transit sites, due to the local Gypsy and Traveller need.

London Plan policies:

- D13 Agent of change
- H14 Gypsy and Traveller accommodation

Local Plan policies:

- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- CG6 Managing flood risk

Evidence base:

- Tower Hamlets Gypsy and Traveller Accommodation Assessment 2016

Policy HF6 Purpose-built student accommodation

1. Development proposals for purpose-built student accommodation (PBSA) will be supported only where it can be demonstrated that:

- a. the proposal would not compromise the supply of Class C3 self-contained homes;
- b. the site is located within a site allocation for PBSA (refer to policies map), is within the CAZ or the Borough's Metropolitan and District Town Centres and in a location with a PTAL of 4 to 6, or within short walking distance of a further or higher education institution;

the proposal would not result in an overconcentration of similar uses within the area, liable to give rise to residential amenity issues to neighbours, and not be detrimental to the mix and cohesiveness of communities and uses in the area;

- d. there is an agreement with one or more of London's Higher Education Institutions; and
- e. the proposal would not place significant pressure on local infrastructure.

2. Development proposals for PBSA are required to:

- a. deliver a minimum of 50% affordable C3 homes on-site, or
- b. where the location is not suitable for C3 affordable housing, deliver a minimum of 50% of units as affordable student accommodation on-site;

3. Development proposals for PBSA are required to:

- a. provide 10% of student rooms which are wheelchair accessible and adaptable, including access to a wheelchair-accessible shower room for independent use (as per London Plan 2021);
- b. provide an appropriate layout of living space, communal amenity space including well located and useable outdoor communal amenity space and internal communal facilities for each student in line with emerging guidance;
- c. secure the majority of the bedrooms in the development, including any affordable student accommodation bedrooms, through a nomination agreement for occupation by students at one or more higher education providers and make best endeavours to secure the remainder of the bedrooms through a nomination agreement for occupation by students at one or more higher education providers; and
- d. give priority of accommodation to local students leaving care, experiencing homelessness, or otherwise in need of alternative accommodation within the borough.

4. Temporary use of PBSA during holidays during the academic year for students attending non-term time courses will normally be supported, provided students without alternative holiday time accommodation are not displaced.

5. Development that proposes the net loss of existing PBSA will only be supported where:

- a. it can be demonstrated that the accommodation is no longer needed because the needs of students can be better met elsewhere, or
- b. adequate replacement housing will be provided which meets the criteria in Part 1 to 4 above.

Supporting text

12.63 In the context of this policy, student housing relates to student accommodation with an undertaking with an institution and accommodation provided by an institution.

12.64 This policy recognises that the delivery of a significant amount of student housing compromises the ability to deliver other priorities, in particular affordable housing, but also employment and infrastructure provision. As such, the delivery of student accommodation needs to be managed in accordance with strategic needs and local priorities, ensuring that the positive impacts it can bring to the local economy and the borough's higher education sector is combined with the delivery of the affordable homes and infrastructure the residents of LBTH need.

12.65 In accordance with part 1(a) of the policy, development proposals for student accommodation will not be supported where they compromise the supply of self-contained homes. In this case, the supply of self-contained homes is defined as: existing housing (use Class C3 and other types of housing, including specialist accommodation), sites with planning permission for housing (use Class C3) and sites allocated in this plan or other development plan documents for the development of housing.

12.66 Part 1(b) of the policy directs student accommodation to the most appropriate locations where the introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport. Close proximity is defined as adjacent to the institution or within walkable distance of 10 to 15 minutes.

12.67 Part 1(c) of the policy acknowledges that student accommodation and large scale purpose-built shared-living developments can have an



impact on the amenity of neighbouring occupiers, particularly in relation to noise and anti-social behaviour. Parts of the borough already have concentrations of PBSA and applications will be required to demonstrate the number of existing and the pipeline of future PBSA developments within a 400m radius, from the site boundary, of the site. Development proposals for student accommodation will need to demonstrate how these matters have been addressed through the layout and design of the development and how they will be addressed through the management of the facility.

12.68 Part 1 (d) requires a development proposal to demonstrate that there is a link between one or more of London's Higher Educational Institutions. This is to ensure that the accommodation provided will serve the need of students seeking education at providers within London. Proposals should also demonstrate that the bedrooms in the Purpose-built student accommodation development are needed by London's HEIs in that particular location, and that its design, layout, and rental levels meet the needs of London's higher education students. Higher Education Institutes should be involved in the early design process of the Purpose-built student accommodation.

12.69 To comply with part 1(e), development proposals for student accommodation will need to carry out an assessment of the provision of relevant infrastructure serving the development, including public transport, electricity, and water to ensure that the proposed development would not place significant additional pressure.

12.70 Part 2(a-b) supports the delivery of affordable student housing in accordance with the London Plan. Part 2(a) recognises the high level of need for traditional affordable housing in the borough and that student housing developments may occupy land that could otherwise be used for the delivery of traditional housing. If the development proposal includes the provision of affordable C3 housing, we will apply the requirements of Policy HF2 in terms of tenure mix and unit size mix. In accordance with the London Plan, development proposals for student housing are assessed on the basis that 2.5 student bedrooms are equivalent to 1 standard C3 dwelling. On that basis, development proposals that include 25 or more student bedrooms are considered major development and will be expected to provide affordable housing on-site. Development proposals that include fewer than 25 student

bedrooms will need to provide a cash-in-lieu contribution in accordance with the small sites affordable housing requirements set out in Policy HF2.

12.71 Part 2(b) acknowledges that there may be some sites that are proposed for purpose built student accommodation where traditional housing would not be appropriate. In those cases, the council will expect the provision of at least 50% of the rooms as affordable student accommodation. Development proposals should demonstrate that the delivery of on-site affordable C3 housing would not be appropriate and feasible. The cost should be no more than 55% of average student income for a UK full-time student living in London away from home. Planning obligations will be used to secure the affordability and availability of the affordable accommodation for as long as the student housing use continues.

12.72 Part 3(a) to (b) sets out the requirements for new student accommodation to ensure that it is of the highest quality and meets the needs of all students who would use the accommodation while locating such accommodation in areas which have the facilities and sustainable transport connections to support residents. In order to meet the needs of students with physical disabilities, 10% of student rooms must be wheelchair accessible (capable of being independently accessed and used). To meet this requirement, rooms and bathrooms must meet the requirements outlined in Figure 30 and Figure 52 in the British Standard BS8300: Design of an accessible and inclusive built environment. Wheelchair-accessible rooms should be located in level 5 or below. The GLA intend to publish London Plan Guidance (LPG) on PBSA proposals will be expected to comply with this LPG.

12.73 In order to demonstrate that there is a need for the proposed student accommodation, Part 3(c) requires student accommodation to either be operated directly by a higher education institution or have an agreement in place from initial occupation with one or more higher education providers to provide housing for its students. This agreement is known as a nomination agreement and must cover the development as long as it is used for student accommodation. A nomination agreement with one or more higher education providers must cover at least 50% of the bedrooms within the development, and all of the affordable student bedrooms. For the remainder of the student bedrooms, development proposals must demonstrate that best endeavours have been taken to secure nomination agreements with higher education institutions, including demonstrating that, in the first instance, all local higher education institutions have been approached and, in the second instance, that all higher education institutions based in London and the immediate vicinity have been approached. The nomination agreement will be secured through a S106 agreement.

12.74 The London Borough of Tower's Hamlets classes those who have left the care system as a protected characteristic. In order to comply with part 2(d), development proposals should demonstrate that they have engaged with the council's youth services to identify local students in need of alternative accommodation within the borough in order to attend college or university.

12.75 Part 4 seeks to support PBSA utilization as accommodation during non-term time holidays when it would normally be largely left under occupied. The PBSA could be used to provide accommodation for other students attending non-term time courses, seminars, or entry examinations. The accommodation should not be used for non-educational purposes. Some students may not have alternative holiday

time accommodation, including recent care-leavers and others. These students should not be displaced.

12.76 Part 5 relates to proposals involving the net loss of student accommodation. The loss of student accommodation should not create additional pressure on the existing housing stock and the supply of new housing, and thus it will only be supported where it can be demonstrated that it no longer serves a purpose or can be provided elsewhere.

London Plan policies:

- H4 Delivering affordable housing
- H15 Purpose-built student accommodation

Local Plan policies:

- HF2 Affordable housing and housing mix
- HF3 Protection of existing housing
- DV5 Developer contributions
- PS4 Attractive streets, spaces and public realm

Evidence base:

- Housing SPG (2016)
- Housing Design Standards LPG (2023)
- Local Housing Need Assessment (2023)
- British Standard BS8300: Design of an accessible and inclusive built environment
- High Density Living SPD, 2020

Policy HF7 Large-scale purpose-built shared-living

1. Development proposals for large-scale purpose-built shared-living (LSPBSL) will only be supported where it can be demonstrated that:

- a. the proposal meets the definition of LSPBSL as set out in the London Plan policy H16;
- b. it would not compromise the supply of Class C3 self-contained homes;
- c. it forms part of a mixed-use development that provides ground floor spaces that serve the community, either with community uses or town centre uses where relevant at the ground floor and well-activated public realm spaces;
- d. it is located within the CAZ or the Borough's Metropolitan and District Town Centres; and
- e. it would not result in an overconcentration of similar uses, would not be detrimental to neighbouring residential amenity and would not be detrimental to the mix and cohesiveness of communities and uses in the area.

2. Development proposals for LSPBSL are required to:

- a. deliver a minimum of 50% affordable C3 homes on-site; or
- b. provide a financial contribution secured by planning obligation equivalent to 50% C3 affordable housing at the borough's required tenure and size mix.

3. Development proposals for LSPBSL are required to:

- a. provide 10% of homes which are wheelchair accessible and adaptable, including access to a wheelchair-accessible shower room for independent use;
- b. comply with relevant design guidance and standards and satisfy the most up to date housing space standards as the time of assessment;
- c. provide communal space that meets the minimum requirements for houses in multiple occupation;
- d. provide an appropriately detailed and resourced management plan to mitigate potential harm to residential amenity; and
- e. be under single management

Supporting text

12.77 Large-scale purpose-built shared living (LSPBSL) is defined as non-self-contained market housing developments that include at least 50 units. This type of housing can provide accommodation to single person households who cannot or choose not to live in traditional self-contained housing or HMOs. London Plan Policy H16 provides additional policy requirements and guidance for the development of LSPBSL.

12.78 LSPBSL can play a role in meeting a component of the need for new homes in the borough. Development proposals should be situated in locations which are close to existing services, facilities and public transport.

12.79 In accordance with part 1(b) of the policy, development proposals for LSPBSL will not be supported where they compromise the supply of self-contained homes. In this case, the supply of self-contained homes is defined as: existing housing (use Class C3 and other types of housing, including specialist accommodation), sites with planning permission for housing (use Class C3) and sites allocated in this plan or other development plan documents for the development of housing.

12.80 Part 1(c) sets out that LSPBSL should be genuinely mixed-use developments which offer more uses than merely residential and therefore optimises land use given the preferred locations as set out in Part 1 (d).

12.81 In line with London Plan Policy H16 Part 1 (d) spatially directs LSPBSL developments to the CAZ and the borough's metropolitan and district town centres which would offer the readily available services to serve LSPBSL. These are areas which also offer access to public transport with high PTAL scores.

12.82 Part 1 (e) given the high density nature of LSPBSL, they can have particular impacts on their surrounding communities in terms of noise, privacy, and stress on existing infrastructure. To ensure that LSPBSL does not have a negative impact on the amenity of an existing community, development proposals will be required to provide an assessment of the potential impacts of the proposal, and the cumulative impacts of the proposal alongside other consented development in the surrounding area, on neighbouring amenity, and any measures necessary to mitigate these impacts.

12.83 The Council will monitor the pipeline of existing and consented LSPBSL schemes to determine their concentration across the borough and identify areas which could be subject to an overconcentration impacting upon balanced and mixed communities.

12.84 Additionally, information setting out existing and planned infrastructure within the vicinity of the development proposal will help inform understanding of how part 1 (e) has been addressed.

12.85 Parts 2 (a) and (b) In accordance with the London Plan, development proposals for LSPBSL are assessed on the basis that 1.8 bedrooms are equivalent to 1 standard C3 dwelling. On that basis, as required by Part 2(a)-(b), development proposals that include 18 or more bedrooms are considered major development and will be expected to provide affordable housing on-site or a cash-in-lieu contribution equivalent to the delivery of 50% affordable housing. Development proposals that include fewer than 18 bedrooms will need to provide a cash-in-lieu contribution in accordance with the small sites affordable housing requirements set out in Policy HF2.

12.86 In order to meet the significant need in the borough for affordable housing, part 2 of this policy requires development proposals for

LSPBSL to either provide a cash-in-lieu contribution to the provision of affordable housing elsewhere in the borough equivalent to the delivery of 50% affordable housing at the unit size and tenure mix set out in Policy HF2, or deliver 50% affordable housing on-site at the unit size and tenure mix set out in Policy HF2. Where the affordable housing is delivered on-site, this must be in the form of self-contained C3 housing and the development proposal should ensure that the service charges are affordable for the residents, meaning that they may need to restrict access to some shared amenities within the LSPBSL element. The affordable housing will need to meet the housing standards set out in Policy HFg.

12.87 In accordance with part 3(a), development proposals must provide a maximum of 10% of dwellings as wheelchair accessible units. Given the nature of LSPBSL developments, the communal amenities must also be designed to be wheelchair accessible, including kitchens, laundry rooms, lounges, and external amenity space.

12.88 To meet the requirements of parts 3 (c) and (b), development proposals should have regard to Policy HFg.

12.89 Communal amenity space should be generously sized and high quality and should be located within the site in such a way that it minimises exposure to noise and air pollution. A portion of the amenity space should be provided at ground level to ensure there is space useable by those who may not be comfortable using a rooftop space.

12.90 Part 3(d) requires development proposals for LSPBSL to provide a management plan, that plan should address the following:

- be under single management, with a minimum tenancy length of three months;
- management practices that minimise safeguarding risks;
- opportunities for residents to create and sustain social networks;
- measures that will minimise the accommodation's amenity impacts;
- security and fire safety procedures;
- maintenance of the internal and external areas of the building, including communal spaces and private rooms;
- how services for the residents will operate, for example the concierge service, gyms, room cleaning, or linen changing services, and their timings and access arrangements;
- the management of deliveries for servicing the development and residents; and
- arrangements for moving in and out of the accommodation.

12.91 Management plans will be secured via planning condition or a Section 106 agreement.

12.92 The GLA has produced London Plan Guidance regarding LSPBSL. Development proposals must have regard to this guidance.

12.93 Part 3 (e) requires that LSPBSL schemes be under single management and that such management companies will be responsible for ensuring compliance with any agreed management plan.

London Plan policies:

- H4 Delivering affordable housing
- H16 Large-scale purpose built shared living

Local Plan policies:

- DV5 Developer contributions
- PS4 Attractive streets, spaces and public realm

Evidence base:

- Large-scale purpose built shared living LPG, 2024
- Housing Design Standards LPG, 2023
- British Standard BS8300: Design of an accessible and inclusive built environment
- High Density Living SPD, 2020

**Policy HF8 Housing with shared facilities
(houses in multiple occupation)**

1. Development proposals for housing with shared facilities (Houses in Multiple Occupation (HMO)) will be supported where it can be demonstrated that:
 - a. it will not result in the loss of existing larger housing suitable for family occupation;
 - b. it will provide a cash-in-lieu contribution to the delivery of affordable housing in accordance with policy HF2;
 - c. they are located in an area of high transport accessibility; and
 - d. they comply with relevant standards and satisfy the housing space standards outlined in Policies HF9.
2. Developments for HMOs should include an appropriately detailed and resourced management plan.
3. The loss or self-containment of good quality homes for multiple occupation will be resisted unless:
 - a. it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation; or
 - b. adequate replacement housing with shared facilities will be provided that satisfies criteria 1(a) to (d) above.

Supporting text

12.94 Houses in multiple occupation (HMOs) refer to residential properties that take the form of shared houses, flats, and non-self-contained dwellings. Planning permission is required for an HMO where there are more than six unrelated individuals forming a household who share a kitchen, bathroom, or toilet. This definition is different to that used by the mandatory licencing scheme. HMOs have traditionally provided lower cost housing, including for those under 35 years of age in receipt of the shared room rate housing benefit.

12.95 Applications should seek to address housing need, as outlined in Policies HF1 and HF2. It is considered this is best delivered through a mixed tenure scheme which could meet a range of housing needs. In addition, reflecting the changing role of HMO-style accommodation in the borough and the acute shortage of affordable housing, it is appropriate that all forms of market housing (including HMOs) contribute towards meeting the high affordable housing need.

12.96 Part 1(a) to (d) ensures development proposals contribute towards maintaining mixed and inclusive communities. Affordable housing contributions will be sought from all residential developments (as per the GLA's Housing Supplementary Planning Guidance and Tower Hamlet's SDP on development obligations).

12.97 Part 1 (b) sets out the requirements to provide affordable housing for this type of development. In accordance with the London Plan, development proposals for HMOs are assessed on the basis that 1.8 non-self-contained communal accommodation bedrooms is equivalent to 1 standard C3 dwelling. On that basis, development proposals that include 18 or more bedrooms are considered LSPBSL and covered by Policy HF8. Development proposals that include fewer than 18 non-self-

contained communal accommodation bedrooms will need to provide a cash-in-lieu contribution in accordance with the small sites affordable housing requirements set out in Policy HF2.

12.98 HMO developments must provide high-quality living space, in line with relevant standards as outlined in HF9 and PS3. Applicants should also ensure that HMOs satisfy the appropriate environmental health and fire safety standards. Part 2 sets the requirement for the inclusion of a management plan which should contain:

- management practices that minimise safeguarding risks;
- opportunities for residents to create and sustain social networks;
- measures that will minimise the accommodation's amenity impacts; and
- security and fire safety procedures.

12.99 Part 3 of the policy seeks to protect existing HMOs where they are of a suitable standard.

London Plan policies:

- H9 Ensuring the best use of stock

Local Plan policies:

- HF2 Affordable housing and housing mix
- HF3 Protection of existing housing
- PS3 Securing design quality

Evidence base:

- LBTH LHNA 2023

Policy HFg Housing standards and quality

1. All residential development is required to demonstrate that, as a minimum, it meets with the most up-to-date London Plan space and accessibility standards, in particular:
 - a. it provides a minimum of 2.5 metres floor-to-ceiling heights, and
 - b. at least 10% of dwellings are built to the 'wheelchair user dwellings' accessible housing standard M4 (3) and the remainder of dwellings are built to the 'accessible and adaptable dwellings' accessible housing standard M4 (2) both contained within part M (volume 1) of the building regulations:
 - i. Where units which meet the wheelchair user dwellings standards M4 (3) (2) (b) are to be delivered above the ground floor, access to a second lift must be provided.
 - ii. In exceptional circumstances, where units which meet the wheelchair user dwellings standards M4 (3) (2) (b) cannot be accommodated on site, contributions in-lieu will be considered.
 - c. To ensure wider accessibility development proposals must include powered and fully automated:
 - i. Communal gates
 - ii. Communal doors and first fire doors
 - iii. Doors to waste storage rooms
2. Development proposals for affordable housing should demonstrate that:
 - a. they are not externally distinguishable in quality from private housing; and
 - b. low cost rented family units should include a mix of units which offer homes with open plan living spaces and separate kitchen and living rooms.
 - c. should have well-appointed and adequately sized entrance lobby areas
3. Residential development proposals are expected to maximise the proportion of dual aspect units. Where single aspect units are proposed, justification should be provided demonstrating that no alternative design was feasible that would have reduced or eliminated single aspect units. Developments should also incorporate external shading to adapt to a warming climate.
4. Developments must use hard wearing, durable materials for the affordable housing elements of the development.
5. Development is required to protect or re-provide existing amenity space (private, communal, and child play space). Net loss of existing amenity space will be resisted.
6. Development will need to demonstrate how it will meet the following minimum amenity space (private, communal, and child play space) standards on site:
 - a. a minimum of 5 square metres of private outdoor space should be provided for each 1-2 person dwellings and an extra 1 square metre should be provided for each planned additional occupant in each larger dwelling;
 - b. balconies and other private external spaces should have a minimum width and depth of 1500 mm;

- c. for developments with 10 or more residential units, the minimum communal amenity space (excluding circulation areas, access routes and waste or bike storage) should be 50 square metres for the first 10 units plus a further one square metre for every additional unit thereafter;
- d. major developments should provide a minimum of 10 square metres of high-quality play space for each child and young person;
- e. Communal amenity space should:
 - i. receive sunlight;
 - ii. be adequately screened from parking areas;
 - iii. be located so as to minimise exposure to air and noise pollution;
 - iv. be inclusive for all users;
 - v. be overlooked by habitable rooms to ensure safety and surveillance;
 - vi. incorporate sustainable landscaping principles and practices;
 - vii. be accessible to all residents of the development, irrespective of tenure; and
 - viii. support an appropriate balance between informal social activity and play.
- f. Development proposals should locate play spaces at ground floor level or demonstrate why this is not practical. Development proposals that include child play space on rooftop spaces or internal floorspace should have direct access to outdoor amenity space and allow oversight of children outside from family sized homes.

Supporting text

12.100 Delivering the homes the borough needs will result in further optimisation of land use and therefore require an appropriately quality-driven response to maintain and improve standards of living in the borough. High density developments necessitate that development delivers higher than the minimum design, space, and amenity standards. The High Density Living SPD provides additional guidance regarding standards of accommodation for development proposals.

12.101 Part 1(a) and (b) seeks to ensure all housing development provides adequate internal space to meet relevant space, accessibility and amenity standards and provide an appropriate living environment. It requires development to comply, as a minimum, with the space and accessibility standards set out in the London Plan (GLA, 2021), the Housing Design Standards London Plan Guidance (GLA, 2023) and the Housing Supplementary Planning Guidance 2016), whilst having regard to the particular needs of residents in the borough as well as the increasingly dense character of the built form. If the GLA's space and accessibility standards are updated, the council may seek to implement these changes, so long as they are locally suitable. The council strongly urges developers/applicants to provide evidence of how the scheme will achieve high-quality design.

12.102 In order to implement Part 1(b) and meet standards in the Housing Supplementary Planning Guidance (2016), 10% of all new units across all tenures should be wheelchair user dwellings, but this may be varied to at least 10% of habitable rooms where a better outcome is provided in terms of delivery of larger units. All 'wheelchair user dwellings' (the M4 (3) standard) in the affordable rented tenure should meet the M4 (3) (2) (b) standard which meets the needs of occupants who use wheelchairs.



12.103 It is expected that units which meet the wheelchair user dwellings standards M4 (3) (2) (b) above the ground floor will be provided with access to a second lift for use when the primary lift is not functioning. The council has a preference that units which meet the accessible units standards M4 (3) will be provided below the fifth floor due to difficulties allocating wheelchair accessible units on higher floors. In some circumstances, site constraints (such as the inability to secure sufficient accessible parking, lack of lift circulation space, and restrictions on ground floor residential uses) could lead to applicants arguing that units which meet the wheelchair user dwellings standards M4 (3) (2) (b) may not be able to be delivered on site. In these

circumstances, we may accept payments in lieu of the provision of units which meet the wheelchair user dwellings standards M4 (3) (2) (b) through the 'Project-120' scheme. The payment in lieu will cover the typical installation costs of retrofitting an existing dwelling and will be secured by planning obligation.

12.104 Part 1 (c) ensures wider accessibility of development proposals, greater ease of use and safety for all residents.

12.105 Part 2 provides guidance that private and affordable housing should not be distinguishable. Different tenures should be mixed throughout a development, although it is recognised that separate cores may be required to enable effective management and minimise service charges for affordable units. Where separate cores result in separate entrances for market and affordable units, these entrances must also not be externally distinguishable and must be located so that they are of equivalent access and amenity value. The internal layout, floor levels and quality of affordable housing entrances must be of a high quality and sufficient area and thoughtfully designed to accommodate access and ease of movement of residents using, wheelchairs, mobility scooters or push chairs. Entrances and lobbies must also be well-appointed and adequately sized to ensure inclusive accessibility for those with mobility impairments or entering with small children in pushchairs, having regards to the guidance in the High Density Living SPD.

12.106 Part 2 (c) sets out that low cost rented family homes should generally be designed to include a mix of homes which offer open plan living spaces and also separate kitchen and living room which offers choice to meet the preferences of those living in the borough and in housing need.

12.107 Part 3 recognises the benefits of dual aspect dwellings to the

well-being of residents and the ability of housing to adapt to the impacts of climate change without the need for mechanical cooling. In order to justify the inclusion of single-aspect dwellings, development proposals will need to demonstrate that no alternative design or layout that includes a greater proportion of dual-aspect dwellings is feasible. In line with the policies in the Clean and Green Future chapter development must mitigate and adapt to climate change. Developments should incorporate overhangs, eaves, recesses, louvres or shutters to aid temperate control of internal spaces.

12.108 Part 4 recognises that due to higher occupancy rates and child yields, affordable housing is likely to be subject to more wear and tear than other housing tenures. In order for these homes to be fully fit for purpose, developers must use hard-wearing, durable materials to ensure the development remains of high quality throughout its lifetime and requires minimal service charges to clean and maintain. This should be evidenced in the design and access statement. In addition, all family-sized affordable homes should have separate kitchens and living rooms, due to local needs. For further guidance, please contact our affordable housing service and/or refer to the Tower Hamlets Housing Forum's Section 106 Design Guide.

12.109 Part 5 aims to ensure that all existing amenity space is protected. Where it would result in an improvement in quantity and/or quality of open space, re-provision will be allowed.

12.110 Part 6 seeks the provision of new outdoor amenity space on-site which is 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.

12.111



12.112 In considering the design and layout of private amenity space, it is important that the space meets the minimum standards set out in the policy (see part 5) to ensure that residents have sufficient space to carry out activities such as drying clothes or eating a meal outside.

12.113 Due to the positive impacts of access to nature in terms of well-being, a significant amount of amenity space should include soft landscaping. This also provides greater opportunity to incorporate biodiversity elements and sustainable drainage systems (SuDS). In considering the design and layout of communal space, it is important that this space is integrated into the overall design of the development and the wider public realm. The design should ensure that communal

space is overlooked and supports a range of activities including space for relaxation, gardening, urban agriculture, and opportunities to promote biodiversity, ecology, and intergenerational community cohesion.

12.114 In considering the design and layout of child play space, it is important to ensure that this responds to the needs of children within the development. This space should be well-integrated into the development and fully considered in the design of the communal space. However, play provision requirements must be provided in addition to other quantitative standards, such as open space provision and communal space provision. In order to demonstrate that the proposed play space is of high quality, applicants will be required to demonstrate how they have used Play England's 10 key design principles for creating successful play spaces. Development proposals that do not include on-site play space will not generally be supported. In exceptional circumstances, where a development proposal can demonstrate that all opportunities to provide the required play space on-site have been exhausted, the council may seek a cash-in-lieu contribution to support expansions or enhancements to existing play spaces. This will be secured by as a planning obligation.

12.115 Part 6(e) sets out standards for the development of communal amenity space, including child play space. More guidance regarding the design of communal amenity space can be found in the High Density Living SPD. In regeneration schemes it is recommended that input is sought from existing residents on the design of communal amenity spaces.

12.116 Part 6(f) recognises that ground floor space is preferable for the provision of child play space and that some residents and parents may be anxious using a rooftop space. In the first instance development

proposals should seek to deliver child play space at ground floor level and where this is not possible robustly demonstrate why it is not achievable. Where ground floor child play space cannot be delivered it must adjoin direct accessed amenity space which is overlooked by family homes to foster a sense of security.

London Plan policies:

- D6 Housing quality and standards
- D7 Accessible housing
- S4 Play and informal recreation

Local Plan policies:

- DV3 Health impact assessments
- PS3 Securing design quality
- PS4 Attractive streets, spaces and public realm
- CG7 Sustainable drainage
- CG9 Air quality
- CG10 Noise and vibration
- BO6 Plan and recreation spaces

Evidence base:

- High Density Living SPD, 2020
- Nationally Described Space Standards, 2015
- Tower Hamlets Child Yield Calculator, 2017

13. Clean and green future



- CG1 – Mitigating and adapting to a changing climate
- CG2 – Low energy buildings
- CG3 – Low carbon energy and heating
- CG4 – Embodied carbon, retrofit and the circular economy
- CG5 – Overheating
- CG6 – Managing flood risk
- CG7 – Sustainable drainage
- CG8 – Water efficient design
- CG9 – Air quality
- CG10 – Noise and vibration
- CG11 – Contaminated land

Introduction

13.1 Addressing the climate emergency is both a global and local issue, where the challenge to mitigate against the impacts of a changing climate begins in our homes, streets, and buildings. The Tower Hamlets Council Strategic Plan 2022-2025 sets out the council's ambition to address the climate crisis by ensuring that the borough ranks among the cleanest, greenest, and most energy efficient local authorities, not just in London, but the whole of the UK.⁵

13.2 In March 2019, Tower Hamlets became one of the first councils in the country to declare a climate emergency and adopt a Net Zero Carbon Plan for the Borough. This plan sets out commitments to reduce carbon emissions under the council's direct control (such as from council-owned and operated buildings and vehicles) to net zero by 2025. In 2021, the council joined the UK 100 Net Zero Pledge to become a Net Zero Borough by 2045 or sooner,⁶ five years ahead of national targets.⁷

13.3 There is a growing body of evidence that the built environment is a major contributor to greenhouse gas emissions. The Tower Hamlets Net Zero Carbon Partnership Action Plan (2021) estimates that buildings made up approximately 31% of the borough's emissions in 2016, and that the overall level of emissions from this sector would barely decrease at all by 2050 under a 'business as usual' scenario. In addition, Tower Hamlets currently produces the fourth highest levels of total carbon emissions out of all London boroughs.⁸ It is evident that significant changes must be made to achieve the council's net zero carbon commitments.

⁵ A Cleaner and Greener Future for Tower Hamlets (2023)

⁶ Tower Hamlets Net Zero Carbon Partnership Action Plan (2021)

⁷ The Climate Change Act 2008 (2050 Target Amendment) Order 2019

⁸ London Energy and Greenhouse Gas Inventory (LEGGI) (2020)



13.4 However, it is no longer adequate to focus on carbon emission reduction as the sole means of addressing the climate emergency. London is already experiencing the effects of a changing climate, from warmer winters to hotter summers, with increased risk of extreme weather events such as heatwaves and flooding. Many local residents and businesses have already experienced dramatic increases in energy costs, with families struggling to afford to heat their homes over the winter. Indeed, all measures taken to address the impacts of climate change are tantamount to protecting and improving people's

health, well-being, and quality of life. Climate change also impacts the resilience of natural habitats, and can harm the natural biodiversity of the borough's green and blue spaces. Adaptation and mitigation must be a crucial consideration in planning and development, to ensure that development in Tower Hamlets will not adversely affect, but rather improve, climate resilience within the borough and London as a whole.

13.5 Tower Hamlets is a low-lying borough that will severely suffer from increased flooding if the effects of climate change are not mitigated in the coming years. Whilst the Thames Barrier and other flood defences currently provide effective protection, their continued maintenance, along with further investment in flood defences, is required. Climate change will increase the risk of flooding, and it will be necessary to consider the ways of mitigating the risk of flooding for the lifetime of a development. The borough also has a number of critical drainage areas which are at higher risk of surface water flooding. London-wide vulnerability mapping indicates that Tower Hamlets is at increased risk of overheating resulting from a changing climate, and greater mitigation and adaptation measures must be introduced to cope with the scale of these changes.⁹

⁹ Climate Risk Mapping, GLA (2022)

13.6 Despite this, London has lower rainfall than the national average, whilst having a very high population density. This combination has resulted in London being declared an area of serious water stress and could face future water shortages; a trend that is likely to be exacerbated by climate change.

13.7 The whole of the borough falls within an Air Quality Management Area (AQMA), parts of which exceed the World Health Organisation (WHO) guideline limits and national air quality objectives on harmful pollutants. Air pollution is associated with adverse health impacts which particularly affect the most vulnerable in society.¹⁰

13.8 The policies set out in this chapter support the council's strategic priorities to reduce future emissions arising from new development within the borough, by delivering low-energy developments that require minimum energy for space heating, providing ultra-efficient systems for heating and hot water, combined with high levels of insulation, that will minimise the costs to future occupants.

13.9 This section contains the following policies:

- CG1: Mitigating and adapting to a changing climate
- CG2: Low energy buildings
- CG3: Low carbon energy and heating
- CG4: Embodied carbon, circular economy and retrofit
- CG5: Overheating
- CG6: Managing flood risk
- CG7: Sustainable drainage
- CG8: Water efficient design
- CG9: Air quality
- CG10: Noise and vibration
- CG11: Contaminated land and storage of hazardous substances

¹⁰ Tower Hamlets Air Quality Action Plan (AQAP) 2022-2027

Policy CG1 Mitigating and adapting to a changing climate

1. The council will support development proposals that increase local resilience to the impacts of a changing climate by:
 - a. reducing operational carbon emissions through energy efficient and sustainable design, low carbon heat, and local renewable energy generation;
 - b. adapting to the impacts of a changing climate by ensuring developments mitigate the risk of overheating and flooding;
 - c. promoting efficient use of materials in the construction process in line with the principles of the circular economy, minimising waste and consumption throughout the lifecycle of a building;
 - d. prioritising the reuse and retrofit of existing buildings before design and construction of new buildings to minimise upfront embodied carbon emissions;
 - e. incorporating water efficiency measures to reduce water use and discharges; and
 - f. mitigating and improving poor air quality in the borough, and contributing towards delivering the objectives of the latest Tower Hamlets Air Quality Action Plan (AQAP).

Supporting text

13.10 This strategic policy seeks to support the council's commitment to becoming a net zero carbon borough by 2045, and ensure that future development will protect and enhance the key aspects of the borough's environment while improving the health of local residents by mitigating against the impacts of a changing climate.

13.11 New developments will be expected to be net zero carbon in operation where possible, with low energy use and high thermal efficiency. Developments will be expected to maximise renewable energy generation on site through the use of photovoltaic (PV) panels, reducing dependence on the National Grid and supporting access to low-cost clean energy. Delivering energy efficient buildings will also help to manage the increasing costs of energy bills faced by many borough residents and businesses.

13.12 To achieve net zero carbon, new developments must also minimise embodied carbon, and seek to drive down carbon emissions in the demolition, construction, and maintenance phases of a building. New developments should be designed with consideration of disassembly, reuse, or recycling to encourage sustainable material uses and minimise waste in line with circular economy principles.

13.13 Recent London-wide vulnerability mapping¹¹ indicates that Tower Hamlets is at increased risk of flooding and overheating as a direct result of a changing climate. New development must be planned, designed, and constructed to respond to future anticipated changes in climate, such as warmer winters and hotter summers, and the risks associated with such changes, including increased likelihood of extreme weather events such as droughts, heatwaves, intense rainfall, and flooding.

11 Climate Risk Mapping, GLA (2022)

13.14 In recognition of the borough's areas of flood risk, more vulnerable development should be located away from these areas, as shown on the Policies Map. As part of the council's commitment to reducing the risk of flooding, Tower Hamlets will work closely with national and regional bodies, neighbouring authorities, and relevant landowners to:

- maintain and improve the existing flood defences;
- raise flood defences in line with the Thames Estuary 2100 (TE2100) Plan;
- ensure effective emergency-planning practices are in place;
- keep up-to-date information about flood risk in the borough and likelihood of flood events; and
- enhance multi-functional green space with nature-based drainage systems to alleviate local surface water flood risk, in line with the drainage hierarchy.

13.15 New development must also address London's water stress by reducing water use. London is in an area of severe water stress, but planned growth and development will rapidly increase the demand for water. New developments will need to reduce demand on fresh and wastewater systems and champion sustainable futures through innovations in water efficiency, as well as rainwater harvesting and greywater collection and reuse.

13.16 Development plays a key role in improving air quality and reducing exposure to air pollution. Air quality modelling indicates that the most polluting areas in the borough are along arterial roads. In these areas of sub-standard air quality, nitrogen dioxide levels exceed national air quality objectives, and particulate matter exceed annual mean limits –

(PM2.5 levels greater than 10 µg/ m³ (WHO 2005 air quality guideline (AQG) limits) and PM10 levels greater than 40 µg/ m³ (national objective limits). There are no safe levels of air pollution exposure, and health risks associated with particulate matters are a significant cause for concern. The Tower Hamlets AQAP outlines the mitigation measures to reduce people's exposure to air pollution and identifies the ways in which development can improve air quality in the borough.

London Plan policies:

- GG6 Increasing efficiency and resilience
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI5 Water infrastructure

Local Plan policies:

- DV2 Delivering sustainable growth in Tower Hamlets

Evidence base:

- Tower Hamlets Net Zero Carbon Plan, 2020
- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023
- Delivering Net Zero, 2023
- LETI Embodied Carbon Primer, 2020
- Strategic Flood Risk Assessment (2024)
- Air Quality Action Plan, 2022-2027
- Thames Estuary 2100 (TE2100) Plan

Policy CG2 Low energy buildings

1. Development proposals will be supported where they are designed and constructed to be net zero carbon in operation.
2. Development proposals must demonstrate through submission of an energy assessment that energy demand has been minimised, and are required to meet the following Energy Usage Intensity (EUI) standards:
 - a. All residential use proposals must achieve an EUI of no more than 35 kWh/m² GIA/yr.
 - b. Non-domestic buildings should achieve an EUI of no more than the following (where technically feasible) by building type or nearest equivalent:
 - i. Warehouses and light industrial units – 35 kWh/m² GIA/yr;
 - ii. Schools – 65 kWh/m² GIA/yr;
 - iii. Offices, Retail, HE teaching facilities, GP surgeries – 70 kWh/m² GIA/yr; and
 - iv. Hotels – 160 kWh/m² GIA/yr.
3. Development proposals must achieve a space heating demand of less than 15 kWh/m² GIA/yr.
4. Development proposals must demonstrate that the operational energy performance of the development will meet the targets within this policy through the use of a quality assurance standard.
5. Major developments must monitor their total energy use and renewable energy generation and submit the annual figures to the council for the first 5 years of operation.

Supporting text

13.17 Tower Hamlets needs to exceed the zero carbon policies set out in the London Plan for the borough to meet its net zero carbon commitments, and new policies must be bold to reflect the urgency with which the risks associated with climate change must be addressed.¹²

13.18 New buildings must be designed and constructed to net zero carbon standards to enable the council to meet its ambitious zero carbon targets. All new buildings should be designed and built to be net zero carbon in operation, with ultra-low levels of total energy use and space heating demand. These recommendations are in line with recommendations of the Climate Change Committee (CCC), the London Energy Transformation Initiative (LETI) and the Royal Institute of British Architects (RIBA)¹³. Development proposals which do not demonstrate how net zero carbon will be achieved will not be supported.

13.19 Delivering new homes that are as energy efficient as possible is an essential step to address the impacts of the cost-of-living crisis in Tower Hamlets. Buildings that require minimal energy for heating, providing ultra-efficient systems for heating and hot water, combined with high levels of insulation will minimise the costs for future occupants. Achieving the council's zero carbon aspirations will have direct benefits to local residents and communities.

13.20 Part 2 of this policy requires proposals to demonstrate that energy usage has been minimised, by meeting specific Energy Usage Intensity (EUI) target for domestic and non-domestic buildings. The EUI represents the total amount of energy used by a building divided by its floor area (based on gross internal area, or GIA). It is reported in kWh/m² year, and includes both regulated and unregulated energy use. Energy generated by on or off-site renewables does not affect the EUI value.

13.21 The EUI targets set out in this policy are supported by detailed energy modelling as part of the Delivering Net Zero study (2023), which modelled the predictive energy usage of eight building typologies, four domestic and four non-domestic, to identify best-practice targets for low energy-use.

13.22 Part 2(a) identifies an EUI target of no more than 35 kWh/m² GIA/yr for domestic buildings. The definition of domestic refers to a dwelling that houses a single or multiple households. This applies to C3 (Dwellinghouse) and C4 (House in multiple occupation) planning use classes. This target also applies to student or keyworker accommodation, care homes, and extra-care homes.

13.23 Part 2(b) Sets out different targets for non-domestic buildings based on their use, based on extensive predictive energy modelling within the Delivering Net Zero study (2023). Non-domestic buildings include warehouse and industrial, schools, office, retail, and HE facilities, GP surgeries, and hotels. Where a non-domestic development does not have an applicable category of use outlined in the policy, the applicant should discuss with the council to identify an appropriate EUI target.

¹² Tower Hamlets Net Zero Carbon Plan (2020) Pg 31

¹³ Delivering Net Zero (2023)

13.24 Part 2(b) Sets out different targets for non-domestic buildings based on their use, based on extensive predictive energy modelling within the Delivering Net Zero study (2023). Non-domestic buildings include warehouse and industrial, schools, office, retail, and HE facilities, GP surgeries, and hotels. Where a non-domestic development does not have an applicable category of use outlined in the policy, the applicant should discuss with the council to identify an appropriate EUI target.

13.25 Part 2(b) (vi) sets the EUI target for hotels at 160 kWh/m² GIA/yr. This is higher than the EUI set out in the GLA Energy Assessment Guidance. This can be attributed to the high energy consumption per m² in hotels due to high catering loads and domestic hot water usage. An updated target has been recommended in the Delivering Net Zero study (2023), which will drive energy and fabric efficiency in hotel design.

13.26 Part 3 requires development proposals to meet a space heating demand of 15 kWh/m² GIA/yr or less.¹⁴ This figure applies to all domestic and non-domestic building types. Space heating demand is the amount of heat energy needed to heat a building over a year, and is a measure of the thermal efficiency of a building. Space heating demand is influenced by a number of design and specification decisions, including building form and orientation, insulation, airtightness, windows and doors, and the type of ventilation system used. Buildings with a low space heating demand are more thermally efficient and lose heat slowly. This makes it easier to maximise the contribution from renewable energy sources and will result in lower heating and energy costs for residents and businesses.

13.27 For the council to achieve net zero carbon aspirations, it is essential that new buildings deliver the intended energy performance. It is common for the actual energy performance of a building to fail to meet the design standard, which is known as 'the performance gap'. Part 4 requires development proposals to use an assured performance method to demonstrate that the performance gap has been minimised. The assured performance method must be recognised by an accredited industry body. This includes (but is not limited to) the Passivhaus standard, the Building Energy Performance Improvement Toolkit (BEPIT), and the Association for Environment Conscious Building (AECB) standard. Other standards may be used with agreement of the council.

13.28 Furthermore, Part 5 requires major developments to report on energy performance for at least five years following completion, as per the London Plan "Be Seen" requirement, and following the GLA Energy Assessment Guidance (2022). The council intends to publish further guidance on submitting an energy assessment.

London Plan policies:

- GG6 Increasing efficiency and resilience
- SI 2 Minimising greenhouse gas emissions

Local Plan policies:

- DV2 Delivering sustainable growth in Tower Hamlets

Evidence base:

- Tower Hamlets Net Zero Carbon Plan, 2020
- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023
- Delivering Net Zero, 2023

¹⁴ 'UK housing – fit for the future?' Climate Change Committee (2019)

Policy CG3 Low carbon energy and heating

1. All development proposals must use clean and efficient sources of energy, maximising on-site renewable energy generation, storage, and use, through appropriate technologies. The amount of energy generated in a year should aim to supply 100% of the predicted annual energy demand of the building.
2. New developments must not be connected to the gas grid and heat must be provided through zero or low carbon fuels. Gas boilers in domestic or non-domestic developments will not be supported.
3. Major development proposals must prioritise connections to heat networks to support the delivery of net zero carbon emissions solutions for clean, green, and integrated energy systems.
4. Developments with significant heat rejection, such as data centres, must be built ready to supply waste heat to a heat network, including all necessary on-site infrastructure required to facilitate a future connection.
5. Development proposals must submit an energy assessment which demonstrates:
 - a. how on-site renewable energy and/or heat generation has been maximised; and
 - b. how heat network providers have been engaged with.
6. through the energy assessment that the development proposal: Energy offsetting will only be considered as a last resort, and if it can be demonstrated
 - a. does not use fossil fuels on-site for heat or energy;
 - b. has a level of EUI and space heating demand compliant with levels set in Policy CG2; and
 - c. onsite renewable energy generation (e.g. through PVs) has been maximised.
 - d. If all conditions are met, the applicant should establish the shortfall between predicted renewable energy generation to enable the annual renewable energy generation to match the EUI in kWh. The applicant should pay a cash-in-lieu contribution equivalent to generating this energy shortfall.

Supporting text

13.29 This policy seeks to support the council's commitment to low carbon heating and supply of clean energy. New buildings cannot continue to burn fossil fuels for heating if Tower Hamlets is to stay within carbon budgets. Low carbon heat is therefore an essential component of a net zero carbon building. New buildings should contribute to the significant increase in renewable energy generation required between now and 2045.

13.30 Part 1 of this policy seeks to maximise the use of renewable and low carbon energy sources in all new buildings. Development proposals will be required to maximise renewable energy generation on site, matching or exceeding the predicted annual energy use, i.e. renewable energy generation (kWh/m²/yr) = or > EUI (kWh/m²/yr). The most robust method to deliver a balance between total energy use and renewable energy generation for new buildings at a system level is to seek to achieve this balance at the site level. This would also have the advantage of low-cost electricity close to its point of use, helping to deliver energy cost savings for building users.

13.31 Part 2 seeks to ensure that new development will utilise low carbon heating. This is in line with national legislation which will ban the installation of gas boilers in new homes from 2025¹⁵. It also reflects the high carbon costs of combined heat and power (CHP) systems, which often generate power through burning fossil fuels or biomass fuels.

13.32 The carbon content of electricity has been steadily reducing in recent years. In the 2000's, when electricity had a carbon content of approximately 500 gCO₂ e/kWh, heating systems that used gas such as boilers and CHP were considered more environmentally friendly options. This has now changed completely: the de-commissioning of coal-fired power stations and the rise of renewable energy have meant the annual average carbon content of electricity is now around 150-200 gCO₂ e/kWh, and is predicted to reduce further over the next decade.

13.33 Low carbon alternatives that are currently available include heat pumps and direct electric heating. Heat pumps use refrigerant to efficiently move heat from one place to another. Heat pumps can provide both space heating and domestic hot water, can serve individual homes or communal heating systems, and are highly energy efficient (typically around 250-300% for an air source heat pump).¹⁶

13.34 Tower Hamlets is classified as a Heat Network Priority Area (HNPA)¹⁷, meaning that the heat density in Tower Hamlets is sufficient for heat networks to provide a feasible solution for heating buildings. Heat networks can provide a cost-effective and low carbon solution for heating in dense urban contexts, and support Tower Hamlets' transition to a zero carbon borough.

13.35 Part 3 of this policy identifies the need for new developments to connect to heat networks. All heat sources, including ambient and waste heat and significant heat rejection, present opportunities to decarbonise the borough's heating systems and achieve its net zero carbon emissions target. All new developments that emit waste heat must ensure on-site provision is made to future-proof an easy connection to

¹⁵ Heat and Buildings Strategy, Department of Business, Energy & Industrial Strategy (2021)

¹⁶ Delivering Net Zero (2023)

¹⁷ www.london.gov.uk/programmes-strategies/environment-and-climate-change/energy/london-heat-map

future heat networks. This includes the provision of heat exchangers, thermal stores, pipework connections at the site boundary, and heat supply agreements to heat network operators.

13.36 Heat network operators supplying to residential properties should be registered participants in the Heat Trust scheme and each district heating network shall be a Heat Trust registered scheme. Where existing heat networks have not decarbonized, sleeving shall be applied for the connection of new development.

13.37 In addition, a new primary electrical substation will be required on the Isle of Dogs by 2030 as identified in the Opportunity Area Framework and the Isle of Dogs Feasibility Study (Electrical Connectivity) to support ongoing development as well as the electrification of heat and transport and to reduce the pressure on the congested electrical routes currently supplying the island. This will be established on the site of a customer requiring electrical connection.

13.38 To ensure new developments are compatible with future low carbon heating systems, large scale developments should be designed to accommodate heat network connections or communal systems, with adequate space provided for energy centres, plant rooms and distribution pipework within the building.

13.39 For smaller-scale developments where communal and heat network solutions are less likely to be feasible, individual heating systems such as air source heat pumps and ground source heat pumps should be prioritised as low carbon heat options.

13.40 New developments should also explore the uses of smart controls such as building energy management systems to ensure thermal comfort to building occupants which optimises the performance of networked heating solutions such as heat networks and communal systems.

13.41 Part 5 requires all development proposals to submit an energy assessment which demonstrates how on-site renewable energy and/or heat generation has been maximised, and how heat network providers have been engaged with. Applicants should refer to the GLA Energy Assessment Guidance (2022) for further guidance on submitting an energy assessment.

13.42 Part 6 outlines the conditions that must be met to permit energy offsetting through a cash-in-lieu contribution. The CCC has a clear position on carbon offsetting - offsetting must have a very limited role if we are to achieve national targets of zero carbon by 2050. Cash-in-lieu contributions for carbon offsetting calculated at £/tonne CO₂ will not be accepted. Energy offsetting will only be considered where the development has sought to minimise the building's predicted energy usage and maximised PV generation on site. If council officers are satisfied that the development complies with these policy requirements, a cash-in-lieu payment will be accepted to offset the residual difference between energy use and renewable energy generation. In these circumstances, the applicant should establish the shortfall between predicted annual energy usage and annual renewable energy generation. The applicant should pay into the council's offset fund a sum of money equivalent to this shortfall.

13.43 The offset price will be set on the basis of cost to install PVs elsewhere in the borough. Using a reasonable cost rate for a high output PV system with micro-inverters (i.e. £1.016/kWp) and applying a 10% additional rate for administering and managing the PV funding process, would give an energy offset price of £1.32/kWh/yr.

13.44 The energy offset contribution = Energy Gap (kWh) x £1.32/kWh and will be secured via planning obligation. The energy offset contribution is based on calculations from the Delivering Net Zero report (2023). The offset cost calculation may be updated as required, reflecting the varying costs of energy and project delivery.

London Plan policies:

- GG6 Increasing efficiency and resilience
- SL2 Minimising greenhouse gas emissions

Local Plan policies:

- DV7 Utilities and digital connectivity
- EG6 Data centres

Evidence base:

- Tower Hamlets Net Zero Carbon Plan, 2020
- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023
- Delivering Net Zero, 2023
- GLA Energy Assessment Guidance (2022)
- Local Plan Topic Paper – Utilities and Heat Networks (2024)



Policy CG4 Embodied carbon, retrofit and the circular economy

1. Major developments must assess the whole lifecycle carbon emissions of a development by undertaking a Whole Life Carbon (WLC) assessment.
2. Major development proposals should achieve the following LETI 2020 best practice upfront embodied carbon emissions targets for building elements:
 - a. Domestic buildings should achieve upfront embodied carbon limits of 500kg CO₂/m² or less; and
 - b. Non-domestic buildings should achieve upfront embodied carbon limits of 600kg CO₂/m² or less.
3. Development proposals should adopt a circular economy approach to design and construction to reduce waste and minimise embodied carbon emissions. Major development proposals are required to submit a circular economy statement in accordance with the London Plan and Circular Economy Statements LPG (2022).
4. Development proposals should adopt a retrofit-first approach, prioritising retrofit and refurbishment of existing buildings over demolition and construction. Where demolition is proposed, it should be justified by demonstrating that options for retaining the existing buildings and the carbon cost of demolition have been fully explored, by:
 - a. Undertaking a pre-demolition audit which demonstrates how materials will be reused;
 - b. demonstrating how energy and waste will be minimised in the design and construction of the new building, through reuse of materials on-site or ensuring new materials are sustainably sourced and low impact;
 - c. designing for durability and flexibility, disassembly, and reuse at the end of their useful life; and
 - d. demonstrating how the design could support modification, adaption, or retrofitting to suit new uses in the future.
5. Existing buildings are encouraged to undertake retrofit work to improve energy efficiency and reduce environmental impacts. Where planning permission is required for retrofit work, development proposals must submit a retrofit plan, demonstrating how operational carbon will be reduced.

Supporting text

13.45 Whole life carbon (WLC) emissions are the total carbon emissions resulting from the construction, operation, maintenance, and end-of-life/ reuse of a building. WLC encompasses both the operational carbon emissions associated with a building's use, and the embodied carbon emissions associated with production, sourcing and transport of building materials, construction, repair and replacement, and finally end-of-life / reuse of a building.

13.46 To achieve WLC reductions, all emissions from energy used in the material manufacture, construction, operation, maintenance, and end-of-life phases of a building must be measured and reduced. Current best practice for reducing embodied carbon emissions requires designing for disassembly and using low carbon materials; the lowest carbon materials available are those which can be repurposed from existing buildings, in accordance with circular economy principles.

13.47 Part 1 requires all major development proposals to undertake a Whole Life Carbon assessment (WLCA). This requires applicants to calculate operational and embodied carbon emissions and demonstrate how they can be reduced as part of the WLCA. Requiring all major development proposals, not just referable schemes, to undertake a WLCA will help to support the Tower Hamlets' 2045 net zero carbon borough targets, as the construction and development comprises a significant portion of the borough's carbon emissions. It will also drive resource efficiency and adoption of circular economy principles, by encouraging refurbishment, retention, and reuse of existing materials and buildings before demolition and new construction. Applicants may undertake the required Whole Life Carbon reporting using the templates provided by either the London Plan Guidance or the updated RICS Professional Statement.

13.48 Part 2 encourages new development to utilise best practice methods in sustainable design and construction to minimise embodied carbon emissions, and sets best practice upfront embodied carbon emissions targets for new domestic and non-domestic buildings that major development proposals should achieve.

13.49 At present, there are no standardised national targets for embodied carbon emissions due to limited evidence and research on the topic, and the lack of consistent measurements and benchmarks is a key issue faced by the construction industry. Delivering an alignment in embodied carbon measurement is an important interim step towards developing net zero carbon targets that reflect the UK's carbon budget. To address the issue of misaligned targets, LETI have identified best practice targets for upfront embodied carbon, which refers to the initial amount of embodied carbon associated with the building (Building Life Cycle Stages A1-A5 excluding sequestration).

13.50 The LETI Embodied Carbon Target Alignment document sets out an embodied carbon rating system, which outlines total embodied carbon targets and upfront carbon targets. These targets have been developed in collaboration with industry groups, including CIBSE, RIBA, and the GLA, and are being adopted by a number of local authorities in lieu of national and regional embodied carbon targets.

13.51 The LETI Embodied Carbon Primer (2020) identifies that current 'business as usual' building design (without implementing embodied carbon reductions) result in upfront carbon emissions of around 800kg CO₂/m² for domestic and 1,000kg CO₂/m² for non-domestic buildings, equivalent to a LETI band 'E' rating. Current best-practice performance projects in the design phase are able to achieve a LETI band 'C' rating, equivalent to 500kg CO₂/m² for domestic and 600kg CO₂/m² for non-domestic buildings. These targets are equivalent to 40% reduction over

baseline for upfront embodied carbon. Studies from LETI and RIBA both indicate that these limits are achievable and deliverable using industry current best practice. These targets are also consistent with the Whole Lifecycle Carbon Assessment LPG 'Aspirational WLC benchmark' targets for upfront emissions.

13.52 Parts 3 and 4 seek to embed the principles of a circular economy into the design and construction process by retaining materials in use at their highest value for as long as possible, which are then reused or recycled, minimising building waste being sent to landfill. Materials with the lowest embodied carbon costs are those reused and repurposed from existing buildings. Development proposals should consider the whole lifecycle of the building at the earliest stage in the planning process in line with the circular economy principles, including maximising opportunities for material reuse, and designing for disassembly.

13.53 London Plan Policy SI7 defines the circular economy as a 'new economic model that moves away from this current linear economy, where materials are mined, manufactured, used and thrown away, to a more circular economy where resources are kept in use and their value is retained.' The built environment is the largest user of materials and generator of waste in the economy, and accounts for 54% of total waste in London. Moving to a circular economy approach will have a number of benefits for individuals, developers, as well as the natural environment, namely:

- reduce the impact of demolition and waste on air and noise quality;
- reduce the demand for virgin materials;

- drive material optimisation and waste minimisation, reducing material and disposal costs for developers; and
- encourage innovation in material use in design, to ensure buildings can adapt to a variety of uses throughout their lifetime, and
- structures and materials can be dismantled or deconstructed and reused at the end of their life.

13.54 Development proposals should adopt the circular economy hierarchy to inform key decisions in the design and development process. This prioritises a 'retrofit-first' approach, which encourages refurbishment and repurposing of buildings. Where this is not possible, demolition must be fully justified by demonstrating that options for retaining the existing buildings have been explored, and the carbon reductions/ environmental benefits/ public benefits of the new development will outweigh the carbon costs of development. Applicants must also undertake a pre-demolition audit to identify a bill of materials and assets that can be recovered for reuse. Developers are encouraged to sign up to a materials hub platform, to maximise the recovery and reuse of existing materials in other developments.

13.55 Part 5 of this policy seeks to encourage retrofit of existing buildings. New buildings make up only a small percentage of the borough, and to achieve Tower Hamlets' zero carbon aspirations existing buildings will need to undergo retrofit to improve energy efficiency, thermal efficiency, and end reliance on fossil fuels.

13.56 Best practice retrofit can bring multiple social, environmental, and economic benefits, such as reducing energy bills, improving comfort, and supporting national decarbonization efforts. However, a poor or

piecemeal retrofit can miss the opportunity to maximise environmental benefits, and result in need for further retrofit works in the future. Poorly considered retrofitting interventions can even have a negative impact; for example, it is crucial that improvements attempting to enhance energy and carbon performance of homes do not worsen the risk of overheating.

13.57 Where retrofitting works require planning permission, development proposals should submit a retrofit plan, which includes an energy improvement strategy. A retrofit plan demonstrates how retrofitting has been considered comprehensively across the building, using a 'whole building approach', which provides a holistic overview of how a building has been constructed, its context, and the factors affecting energy use. The retrofit plan should demonstrate a consideration for the most suitable retrofit works for the context of the building. Additional guidance on retrofit best practice and developing a retrofit plan is available in the Climate Emergency Retrofit Guide (LETI) and Key Considerations for Commercial Retrofit (UKGBC).

13.58 Where retrofit works for listed buildings or non-designated heritage assets are proposed, developers are advised to engage with the council's design and heritage team at the earliest opportunity, as well as review relevant guidance from Historic England.

London Plan policies:

- SI2 Minimising greenhouse gas emissions
- SI7 Reducing waste and supporting the circular economy

Local Plan policies:

- DV4 Planning and construction of new development
- RW1 Managing our waste

Evidence base:

- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023
- Delivering Net Zero, 2023
- LETI Climate Emergency Retrofit Guide, 2021
- LETI Embodied Carbon Primer, 2020
- LETI Embodied Carbon Alignment document
- Whole Life-Cycle Carbon Assessments LPG, 2022

Policy CG5 Overheating

1. Development proposals must ensure that buildings (both internally and externally) and the spaces around them are designed to avoid overheating and excessive heat generation, while minimising the need for internal mechanical cooling systems and providing sufficient daylight and sunlight levels.
2. Development proposals must submit proof of ability to meet the Building Regulations Part O, using passive design cooling principles only, provided as part of the planning application.
3. All domestic development proposals must submit the Good Homes Alliance 'Early Stage Overheating Risk Tool'. If a medium or high-risk score (>8) is indicated, applicants should undertake dynamic thermal modelling.
4. Major non-domestic development proposals should undertake full dynamic thermal modelling and achieve summer thermal comfort according to CIBSE TM52 requirements.



Supporting text

13.59 London-wide climate risk mapping¹⁸ indicates that Tower Hamlets is at increased risk of overheating as a direct result of a changing climate. Overheating can cause not only significant discomfort to residents and building users, but adverse impacts to health and well-being, and even loss of life. However, relying on mechanical air-conditioning systems to cool buildings can be energy intensive, ineffective, and can cause discomfort to building users. Large developments in particular have the potential to alter the local climate.

¹⁸ Climate Risk Mapping, GLA (2022)

For example, a light-coloured building that reflects heat will stay cool on the inside and the outside, whereas a dark building will absorb heat during the day to raise internal temperatures and slowly release this heat as the temperature cools, warming the local air temperature. Internal air-conditioning systems also produce heat which increases the outside temperature and contributes to the urban heat island effect.

13.60 Part 1 seeks to incentivise good design to minimise the risk of overheating and maximise the effectiveness of passive strategies to avoid the need for active cooling, which brings additional embodied and operation carbon emissions and increased energy costs for residents.

13.61 Part 2 requires development proposals to demonstrate compliance with Building Regulations Part O (2021) using passive measures only without the use of mechanical cooling. These regulations require new developments to demonstrate that the amount of heat entering a building during the summer is minimised, and that excess heat can be adequately removed from the indoor environment.

13.62 The following passive strategies could be used to mitigate the risk of overheating:

- dual aspect ventilation;
- minimum window openable area should be 60% of the total window area, while providing safe and secure openings in accordance with building regulations;
- reduced glazed area on the north, east, and west facades, in respect of minimum daylight requirements;

- external, moveable shading devices (e.g. external shutters or brise-soleil) on east and west facing windows;
- fixed or moveable horizontal shading devices (e.g. awnings) on south facing windows;
- adequate roof insulation;
- reflective walls and roof coating (high albedo materials);
- exposed thermal mass can be used in living areas where night-time ventilation through windows is possible; and
- all ground floor and first level windows should be equipped with safety devices to allow for safe opening of windows at night, with minimum 20% openable free area.

13.63 Design to avoid overheating should be balanced in consideration with impacts of noise and air quality to building users. For example, an over-reliance on opening windows as a passive cooling method would not be appropriate as the only source to mitigate heating in areas of high air pollution and noise pollution, or near existing industrial uses. It may also pose safety risks to ground floor uses. Likewise, design interventions to mitigate overheating which limit natural daylight and sunlight, such as reducing size or quantity of windows, should be avoided, and balanced with cumulative impact to a building's users.

13.64 Where buildings are unable to rely solely on passive cooling measures such as natural ventilation to achieve comfortable conditions due to surrounding pollution or noise levels, mechanical cooling systems will be considered. However, the building should be designed so that, if noise and pollution conditions are resolved in the future, Part O compliance can still be achieved based on passive strategies for domestic buildings and CIBSE TM52 compliance can still be achieved using passive strategies for non-domestic buildings. A full overheating report should be submitted to demonstrate compliance with Part O/ CIBSE TM52 in case of no noise and pollution constraints.

13.65 As per the cooling hierarchy in the London Plan, active cooling systems will only be considered as a last resort. Development proposals that do not robustly justify that compliance with Building Regulations Part O is achievable using passive cooling methods only may not be supported.

13.66 Part 3 requires domestic development proposals to submit the Good Homes Alliance 'Early Stage Overheating Risk Tool'. If a medium or high-risk score (>8) is indicated, applicants should undertake dynamic thermal modelling based on the CIBSE TM59 methodology.

13.67 Part 4 requires major non-domestic development proposals to undertake full dynamic thermal modelling and achieve summer thermal comfort through passive strategies only in the majority of the building, according to CIBSE TM52 requirements. Exceptions can be made for small, enclosed rooms that do not have access to natural light (such as meeting rooms in offices). The CIBSE DSY1 for the 2020s, High Emissions, 50th percentile scenario for Central London should be used for the modelling.

13.68 For both Parts 3 and 4, where the dynamic modelling approach is followed to prove compliance with Part O, the building should also be tested under future weather conditions using the following weather files:

- CIBSE 2080 Low Emissions, 50th percentile weather file for Central London to represent the 2°C GW scenario.
- CIBSE 2080 High Emissions, 50th percentile weather file for Central London to represent the 4°C GW scenario.

13.69 If the assessment fails under future weather files, this should be highlighted in the overheating report as a potential risk.

London Plan policies:

- D6 Housing quality and standards
- SL4 Managing heat risk

Local Plan policies:

- HF9 Housing standards and quality
- CG9 Air quality
- CG10 Noise and vibration

Evidence base:

- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023

Policy CG6 Managing flood risk

1. Development proposals must implement measures to avoid, control, manage, and mitigate the risk of flooding by incorporating resilience and adaptation measures, and should be made safe for its lifetime without increasing the risk of flooding elsewhere. To meet this requirement, development proposals must:

- a. assess the risk of flooding from all sources as informed by the Strategic Flood Risk Assessment (SFRA) or subsequent updates of the evidence and best available data;
- b. be located in areas with the lowest risk of flooding as suitable for the vulnerability level of the proposed uses, as informed by passing the Sequential Test, and if required, the Exception Test; and,
- c. provide a site-specific Flood-Risk Assessment (FRA) in accordance with national requirements, the SFRA, and Environment Agency guidance.

2. A site-specific FRA is required for all development proposals within Flood Zone 2, 3a, 3b, and all major development within Flood Zone 1. The FRA should include:

- a. a sequential test if the development is in Flood Zone 2 or 3;
- b. the risks of both on and off-site flooding to and from the development for all sources of flooding including fluvial, tidal, surface run-off, groundwater, ordinary watercourse, sewer, and reservoir, as well as cumulative risk from multiple sources;

- c. an assessment of breach and overtopping of main river defences;
- d. the impact of climate change using the latest government guidance;
- e. demonstration of safe access and egress;
- f. mitigation measures, taking account of the advice and recommendations set out in the Tower Hamlets SFRA; and,
- g. development design needs to be resilient to and adapt to flooding and allow quick recovery after a flood.

3. Site design of development which meets criteria outlined in Part 2 above is required to:

- a. undertake a sequential approach to development layout to direct highest vulnerability uses to areas of the site with lowest flood risk from all sources; and
- b. incorporate flood resilience and/or resistance measures.

4. Development proposals are required to protect and where possible increase the capacity of existing water spaces and flood storage areas to retain water.

5. Development proposals are required to enable effective flood risk management through:

- a. ensuring buildings are setback from the River Thames and the River Lea and its tributaries by the following distances unless significant constraints are evidenced:

- i. A minimum of a 16-metre buffer strip along a tidal river; and
 - ii. A minimum of a 10-metre buffer strip along a fluvial river.
- b. optimising opportunities to realign or set back defences and improve the riverside frontage to provide amenity space and environmental enhancement.
6. Development proposals must contribute to the delivery of the measures set out in the Thames Estuary 2100 Plan and prepare for raising of defences without negatively impacting amenity in coordination with adjacent plots. Plots including or adjacent to protected wharfs should ensure early consultation and coordination.
7. The construction of new basements, and extension of or change-of-use of existing basements, should give due regard to flood risk and ensure that flood risk on and off site as well as risk to life and property are not increased, and that flood flows, including groundwater flows, are not disrupted.

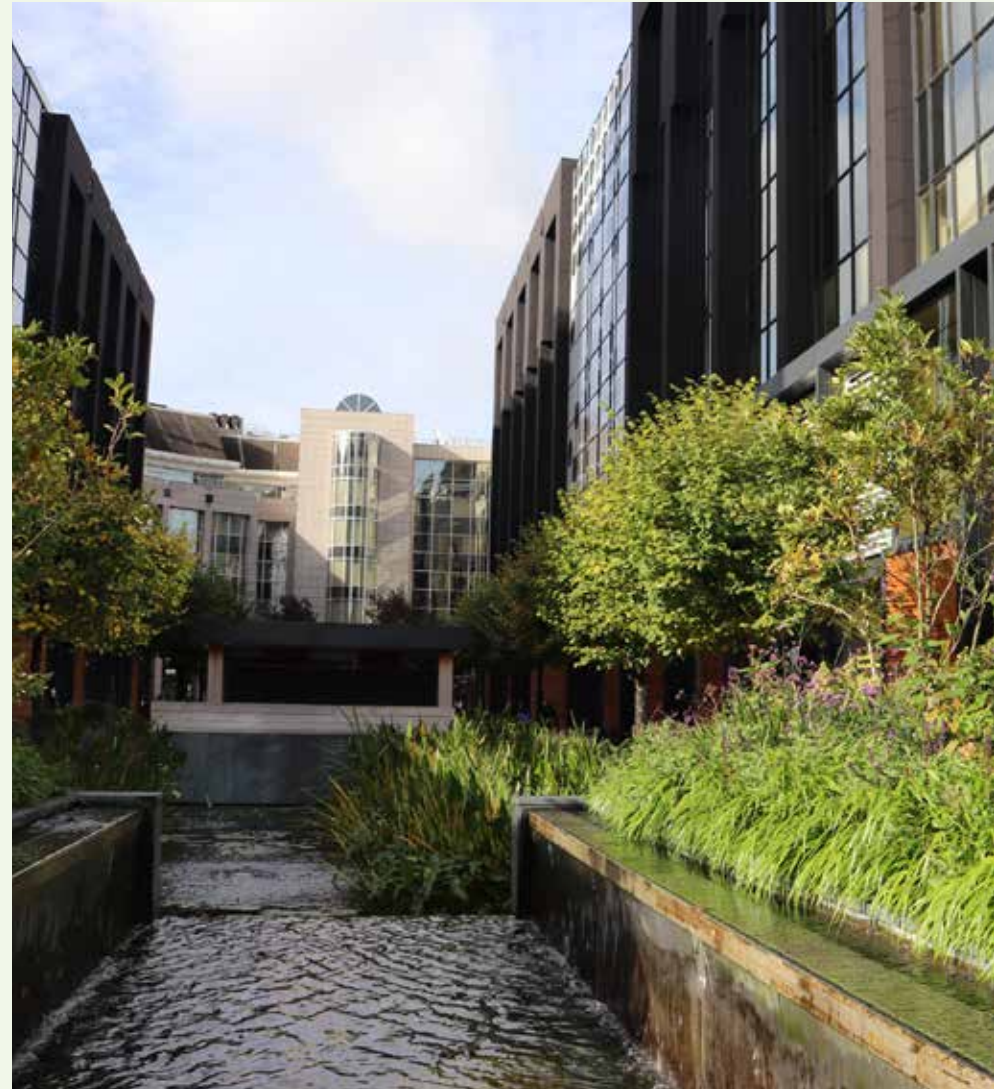
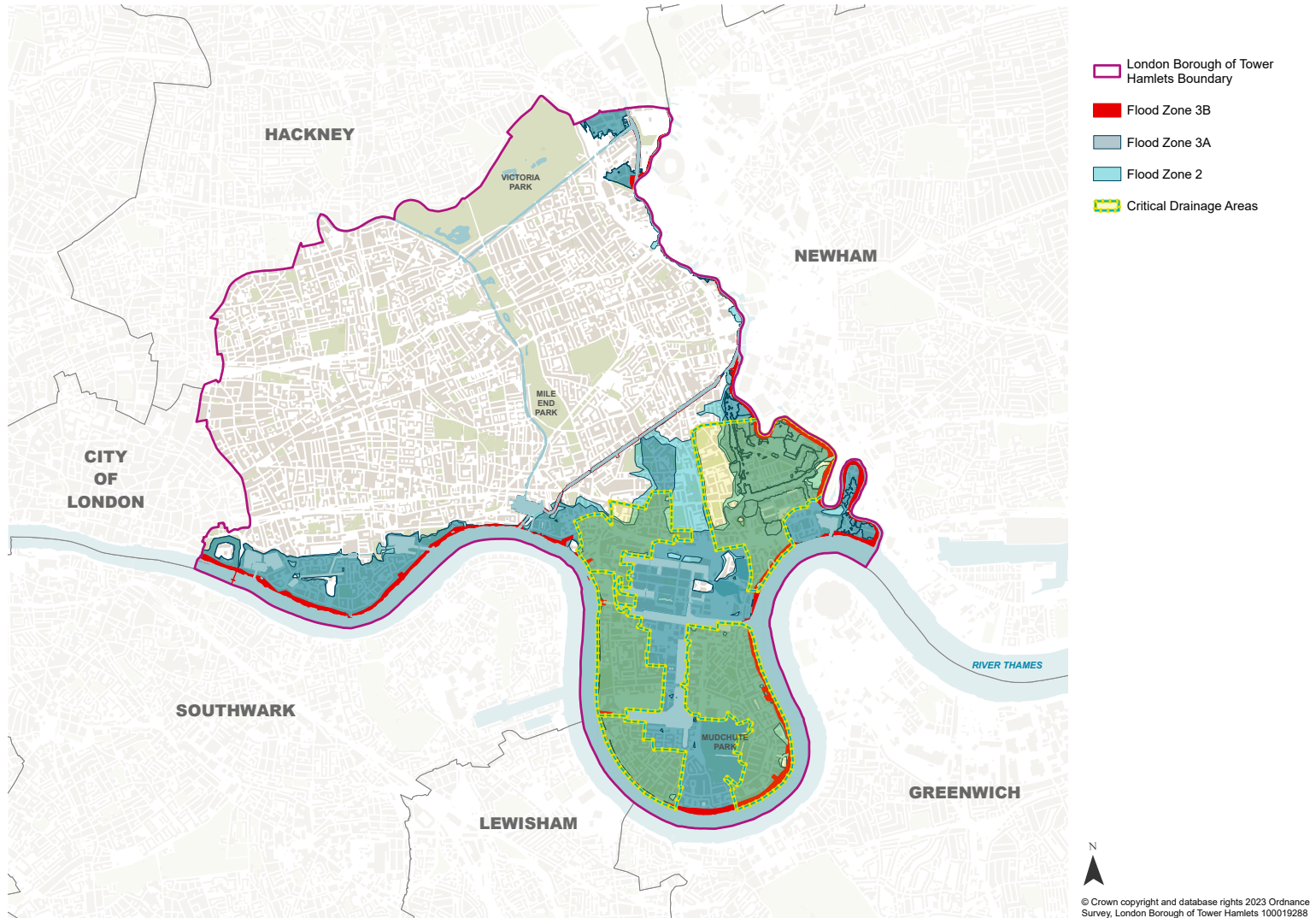


Figure 7: Flood zones map



Supporting text

13.70 Large parts of Tower Hamlets, including the Isle of Dogs and Lower Lea Valley, are in medium to high-risk flood areas (zones 2 and 3). The flood risk zones are shown on the Policies Map and Figure 7. New development must not increase the risk of flooding and must provide mitigation measures to reduce their impact on flood risk, including enabling the repair, raising, and further delivery of flood defences.

13.71 Part 1 of the policy seeks to ensure that new development does not increase the risk of flooding, and that development proposals work proactively to minimise and mitigate flood risk from all sources. Applicants are advised to seek early engagement with relevant stakeholders, including the council as the Lead Local Flood Authority, the Environment Agency, Thames Water, and Port of London Authority. For Part 1 (b), the vulnerability of uses is defined within the NPPF and is contained in the latest SFRA.

13.72 As per the Flood Risk and Coastal Change PPG:

- highly vulnerable uses will not be permitted within flood zone 3a and 3b;
- essential infrastructure and more vulnerable uses within flood zone 3a must pass the exception test; and
- highly vulnerable uses within flood zone 2 must pass the exception test.

13.73 Highly vulnerable uses include a self-contained basement without internal access to the upper floors above breach level. More vulnerable uses include a basement with access to upper floors above the breach level. All basement developments are required to conduct a basement



impact assessment to demonstrate that proposals safeguard structural stability, are safe from a flood risk perspective, and will not have any adverse impacts on local hydrogeology. It should take account of the guidance provided in the SFRA.

13.74 Basements being used for sleeping accommodation is classified as a highly vulnerable use, as per Annex 3 of the NPPF, and as such will not be permitted within Flood Zone 3 or within the tidal breach flood extent. This is in line with Table 2 of the PPG for Flood Risk and Coastal Change. Furthermore, sleeping accommodation will not be permitted below the

tidal breach flood level, in line with national planning policy. This is not limited to basements, and can apply to ground and higher floors, where sleeping accommodation is proposed below the breach flood level.

13.75 To address Parts 2 and 3, the flood risk assessment should also:

- be proportionate with the degree of flood risk that the proposed development is exposed to and may exacerbate;
- consider the cumulative impact of existing and future development; and
- demonstrate where adjacent to flood defences that development will safeguard and maintain the existing flood defences over its lifetime.

13.76 Developments within site allocations which seek to deliver their allocated use do not have to undertake a sequential test, even if the site is in flood zone 2 or 3, as required under Part 3(a).

13.77 Flood resistance refers to constructing a building in such a way as to prevent floodwater entering the building and damaging its fabric. Flood resilience means that a building is constructed in such a way that, although flood water may enter the building, its impact is minimised (i.e. no permanent damage is caused, structural integrity is maintained and drying and cleaning are facilitated). It must be noted that, as per paragraph 68 of the Flood Risk and Coastal Change PPG, flood resistance and resilience measures cannot be used to justify development in inappropriate locations. Water entry strategies are not acceptable for More/ Highly Vulnerable developments. Furthermore, temporary/ demountable barriers are not appropriate for new build developments.

13.78 Part 5 should also be considered alongside Policy BO1 Green and blue infrastructure and BO3 Water spaces. The requirement to include

an adequate buffer zone between waterways and developments applies to main rivers only (as identified in the Tower Hamlets SFRA). It is to enable sustainable and cost-effective flood risk management, including upgrading of river walls and embankments.

13.79 All tidal rivers should have a minimum of 16m buffer strip, and all fluvial rivers should have a minimum 10m buffer strip. This should be measured from the bank to the top to provide an effective and valuable river corridor which improves habitat connectivity. New or additional hard standing waterways within the buffer zones will be discouraged.

13.80 Where the preferred level of setback is unachievable, current and future flood risk must be alleviated to the satisfaction of the Environment Agency and through consideration of the specific recommendations of the Thames Estuary 2100 Plan. This can include:

- raising existing flood defences to the required levels in preparation for future climate change impacts or otherwise demonstrating how tidal flood defences can be raised in the future, through submission of plans and cross-sections of the proposed raising (in particular to demonstrate that the development does not preclude future raising of the defence in line with the Thames Estuary 2100 Plan);
- demonstrating improved access to existing flood defences and safeguarding land for future flood defence raising and landscape, amenity and habitat improvements;
- maintaining, enhancing or replacing flood defences to provide adequate protection for the lifetime of the development;
- where opportunities exist, re-aligning or setting back flood defence walls and improving the river frontage to provide amenity space, habitat, access, and environmental enhancements in line with the TE2100 Plan's riverside strategy approach; and

- requiring the delivery of flood risk management infrastructure and/or improvement measures that mitigate directly related impacts from the development, where these have been identified in the Tower Hamlets Infrastructure Delivery Plan.

13.81 These setback requirements align with the Biodiversity Net Gain (BNF) Rivers Metric assessment, and can also contribute towards opportunities for public access and recreation, as outlined in Policy BO2 Open spaces and the Green Grid network.

13.82 Riparian landowners are responsible for maintaining and raising tidal flood defences, and should follow the latest good practice guidance such as the Estuary Edges guidance.

13.83 Part 7 requires new basements, and extensions, or change of use of existing basements, to ensure that flood risk on and off site as well as risk to life and property are not increased, and that flood flows, including groundwater flows, are not disrupted. Furthermore, new must basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. This is only applicable where there is a waste outlet from the basement, ie, where the basement includes toilets, bathrooms, utility rooms, etc. Applicants should show the location of the device on the drawings submitted with the planning application.

London Plan policies:

- SL12 Flood risk management

Local Plan policies:

- BO1 Green and blue infrastructure
- BO2 Open spaces and the green grid network
- BO3 Water spaces

Evidence base:

- Thames River Basin Management Plan, 2022
- Strategic Flood Risk Assessment (SFRA), 2017
- Strategic Flood Risk Assessment: Update (SFRA) (emerging)
- Local Flood Risk Management Strategy, 2016-2022
- Isle of Dogs and South Poplar Integrated Water Management Plan, 2020
- Sub-regional Integrated Water Management Strategy for the Lower Lea Valley (2023)
- Thames Estuary 2100 (TE2100) Plan
- Estuary Edges

Policy CG7 Sustainable drainage

1. Development proposals are required to reduce the risk of surface water flooding through demonstrating how they reduce the amount of water run-off and discharge from the site through the use of appropriate water reuse and sustainable drainage systems (SuDS) techniques.
2. Any development, refurbishment, or change of use that is likely to increase foul drainage should increase the sustainable drainage capacity on site. If this is not possible and the amount of impermeable surfaces would increase, the developer must provide evidence that combined discharges to sewers will not increase.
3. All major development proposals and any development within Critical Drainage Areas must submit a Surface Water Drainage Strategy which demonstrates that surface water will be controlled as near to its source as possible in line with the sustainable drainage systems hierarchy.
4. Rainwater reuse and nature-based drainage systems must be prioritised over grey SuDS and discharge off-site. Where below ground attenuation tanks are included, monitoring and adaptive control technology should be installed and at least 50% of annual stored water volume reused on site.
5. Development proposals are required to ensure the following run-off standards:
 - a. new development proposals in areas defined in the Integrated Water Management Plan (IWMP), those areas shown in the SFRA as suffering from the risk of surface water flooding, in critical drainage areas, and adjacent sites that flow into the critical drainage area, are required to achieve a greenfield run-off rate and volume leaving the site;
 - b. all other major development proposals must achieve greenfield runoff rate and volume leaving the site;
 - c. where the above flow and volume reductions cannot be achieved on site, a financial contribution will be secured to offset the shortfall; and
 - d. proposals for zero discharge developments will be supported.
6. The design for SuDS are required to:
 - a. follow the requirements set out in Section G of the Environment Agency's Approach to Groundwater Protection;
 - b. be submitted to the SuDS Approving Body (SAB) for review;
 - c. be constructed in line with the most up to date CIRIA manuals, LBTH SuDS guidance, Sewers for Adoption, and any additional requirements an Adopting Body may have; and
 - d. Guarantee the life-time management and maintenance for every aspect of the drainage system.
7. New development proposals, major development proposals and change of use are required to minimise the pressure on the combined sewer network by removing surface water runoff from the sewers.
 - a.

Supporting text

13.84 A further source of flood risk is from surface water flooding. This arises following periods of intense rainfall when the volume and intensity of a rainfall event exceeds the capacity of the drainage system, resulting in localised flooding. Current critical drainage areas in the borough are in the Isle of Dogs, with other smaller areas of high surface water flood risk found throughout the borough. These are shown on the Policies Map and Figure 7.

13.85 The July 2021 floods highlighted London's vulnerability to flooding caused by extreme rainfall. Subsequent research has shown that these events could have happened anywhere in London if the intense rains had fallen in different locations. The impact of flooding goes beyond the material loss and the time spent to get residences and businesses back into use, the risk of loss of life, long term trauma and value impact on properties are very real. With climate change affecting rainfall patterns and sea levels, such events as the July 2021 storms and floods are set to increase in frequency, intensity, and over larger affected areas.

13.86 Recent holistic studies of the local water environment, namely, the Isle of Dogs and South Poplar Integrated Water Management Plan (IWMP) and the Sub-regional (Lower Lea Valley) Integrated Water Management Strategy (SIWMS), have shown that traditional sewerage-based solutions can no longer meet the demand for increased drainage capacity, posed by the combination of development and climate change. Both studies, and indeed integrated water management strategies and plans developed for other parts of London, have shown that SuDS, with emphasis nature-based source control elements, can

significantly reduce the risk and impact of flooding while providing the multiple additional social, economic, and environmental benefits of green infrastructure. Furthermore, implementing a catchment-based approach can deliver positive outcomes for the borough's water environment by promoting a better understanding of the environment at a local level, and interventions upstream benefit sites downstream from a water quality perspective.

13.87 To reduce the amount of water being discharged from sites, this policy requires development proposals to reduce the run-off from all impermeable finishes. When assessing the requirements of this policy, consideration will be given to the size, scale, and nature of the development and whether relative provision has been made. Even minor developments (e.g. rear extensions) have the ability to provide sustainable drainage measures. This policy also anticipates that Schedule 3 of the Flood and Water Management Act is expected to come into force in 2024, and will introduce a mandatory requirement for development proposals to implement SuDS.

13.88 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 BO5, and green grid requirements outlined in Policy BO2, as SuDS can also have biodiversity and urban greening benefits. Applicants should demonstrate that they have considered different types of SuDS, prioritising SuDS which deliver multiple benefits, their ability to remove pollutants, their capacity, and future maintenance.

13.89 SuDS also play an important role in improving the quality of surface water run-off in the borough. Applicants are encouraged to refer to the Thames River Basin Management Plan and Water Framework Directive (WFD) to ensure that SuDS intercept and reduce urban run-off rates, such as through soakaways or permeable paving, in order to protect the borough's water bodies and their associated elements.

13.90 To satisfy the requirements of Parts 1, 2 and 3, all major development proposals and any development within a Critical Drainage Area is required to submit a Surface Water Drainage Strategy including the London Sustainable Drainage Proforma with the planning application. All other relevant development proposals are strongly encouraged to do so.

13.91 Part 2 also seeks address where a development, refurbishment or change of use will increase foul drainage, this will be balanced with reduction of surface water run-off to ensure that discharge to the combined sewerage network will not increase.

13.92 To satisfy the requirements of Part 5, surface water reduction and the required run-off rates should be achieved by following the sustainable drainage systems hierarchy, which is outlined in the London Plan. Infiltration SuDS techniques should only dispose of clean surface water into suitable ground and include stages of the SuDS treatment train as required. They should not be used for foul discharges or trade effluent, and may not be suitable within source protection zone 161 (as defined by the Environment Agency).

13.93 As per Part 5(c), where new development cannot meet the discharge requirements on site after providing evidence that all reasonable effort has been made, it is permissible to pay into a Drainage Offset fund. This will be secured as a financial contribution and will

be invested by LBTH to reduce surface water discharges in existing building stock by the same amount, to achieve the overall drainage target. The methodology for calculating the financial contribution is set out in Appendix 2. Alternative strategies to financial contributions may be sought through agreement with the Environment Agency (EA) and Lead Local Flood Authority (LLFA).

13.94 Part 6 requires all SuDS designs to be submitted to the SuDS Approving Body (SAB) for their review and comment. Submissions should include:

- the prioritisation of nature based "on the surface" SuDS in line with the SuDS hierarchy;
- design criteria, discharge quantity and quality information;
- evidence of amenity and biodiversity benefit with clear links to Biodiversity Net Gain and Urban Greening Factor submissions, in line with policies BO4 & BO5;
- a construction method statement; and
- establishment and long-term management and maintenance information.

13.95 Given the industrial history of Tower Hamlets, discharges of surface water run-off to ground at sites affected by land contamination or from sites used for the storage of potential pollutants may require an environmental permit. This applies especially to sites where storage, handling or use of hazardous substances occurs (for example, garage forecourts, coach and lorry parks/turning areas and metal recycling/vehicle dismantling facilities). These sites will need to be subject to risk assessment with acceptable effluent treatment provided.

13.96 Part 7 seeks to reduce the pressure on the existing combined sewer network by significantly lowering the rate of discharge and

removal of large volumes of surface water from the system, which currently limit the capacity of the sewer system in certain parts of the borough, particularly the Isle of Dogs Opportunity Area. This will help to manage the significant increase of foul water discharge which planned developments in the borough will generate, without increasing the risk of sewer flooding in Critical Drainage Areas and reducing the need for combined sewer system upgrades.

13.97 Tower Hamlets is predominantly served by combined sewers, draining foul and surface water discharges towards Thames Water's Beckton Sewage Treatment Works. Combined sewer overflows discharge excess water to the Thames during heavy storm events, even after the Tideway tunnel is completed. To accommodate additional foul drainage from new development in the existing sewers, surface water discharges from sites need to be reduced. The construction of new sewers is not viable due to significant below ground congestion in many areas, delivery timescales, disruption, and cost.

London Plan policies:

- Sl13 Sustainable drainage

Local Plan policies:

- DV7 Utilities and digital connectivity
- BO1 Green and blue infrastructure
- BO2 Open spaces and the green grid network
- BO3 Water spaces
- BO5 Urban Greening

Evidence base:

- Strategic Flood Risk Assessment (SFRA), 2017
- Strategic Flood Risk Assessment: Update (SFRA) (emerging)
- Local Flood Risk Management Strategy, 2016-2022
- Isle of Dogs and South Poplar Integrated Water Management Plan, 2020
- Thames Estuary 2100 (TE2100) Plan
- Storm overflows discharge reduction plan, 2023
- London Sustainable Drainage Action Plan (LSDAP)
- Sub-regional Integrated Water Management Strategy for the Lower Lea Valley (2023)
- Water and drainage offset study (2023)
- Local Plan Topic Paper – Sustainable Drainage Systems (SuDS) (2024)

Policy CG8 Water efficient design

1. Development proposals are required to reduce mains water consumption through efficiency and substitution measures. This should be achieved by:
 - a. new major residential development proposals must achieve a maximum mains water use of 80 litres per person per day for internal use, plus an additional 5 litres per person per day where external green space is provided;
 - b. making use of fittings with water consumption below those listed in Building Regulations Part G table 2.2;
 - c. domestic refurbishment must meet all BREEAM water efficiency credits;
 - d. non-domestic development and refurbishment should earn at least 75% of available BREEAM water efficiency credits; and
 - e. major development proposals that can demonstrate they are unable to meet the above targets on site must make a financial contribution to the council to offset the shortfall elsewhere.
2. Alternatively, new development proposals should demonstrate how they achieve and maintain performance that qualifies for Thames Water's Tier 2 Infrastructure Charge Environmental Discount.

3. Development proposals which achieve Water Neutrality or Thames Water's Tier 3 Infrastructure Charge Environmental Discount will be supported.
4. All new major residential and non-residential development proposals must install water supply and drainage pipework suitable for the separate collection of rain, grey, and foul water as well as the distribution of non-potable water throughout the development from and to all relevant fitments. All major residential and non-residential refurbishment and change of use should aim to retrofit rain and greywater recycling systems.

Supporting text

13.98 London is an area of serious water stress,¹⁹ but the overall demand for water is growing rapidly. Current building standards are insufficient to manage water scarcity. By 2044, the total difference between demand for water and available water will be over 360 million litres of water per day, unless innovative solutions to address water supply and efficiency are delivered.²⁰

13.99 Part 1 of this policy seeks to reduce the pressure on fresh and wastewater systems through reducing demand and requiring high levels of water efficiency in all new developments. The London Plan requires new residential development to reduce water consumption to 105 litres per person per day or less, which acknowledges the water scarcity prevalent in London. As Tower Hamlets indirectly draws its mains water resource from the river Lee, where groundwater abstractions need to be reduced significantly to avoid the destruction of precious and globally unique chalk stream habitats, it is necessary to reduce local mains water demand below building regulations.

13.100 Data analysis of water demand undertaken as part of the IWMP for the Isle of Dogs and South Poplar found that a London Plan compliant base-demand usage of 105 litres was easily achievable in new residential units through efficient fixtures and fittings alone; innovative solutions such as reuse systems would result in a total potable demand of 75 litres per person per day. To reflect this, part 1(a) requires all new residential developments to achieve maximum mains water use of 80 litres per person per day. This target seeks to support the growth of sustainable communities which are resilient to the impacts of water scarcity.

¹⁹ Water Stressed Area – Final Classification, Environment Agency (2021)

²⁰ Isle of Dogs and South Poplar Integrated Water Management Plan, (GLA, 2020)

13.101 Part 1(b) requires new development proposals to maximise water efficiency measures by using fittings with water consumption below those listed in Building Regulations Part G (2021) or relevant updates.

Table 2: Maximum fittings consumption optional requirement level in Building Regulations Part G (2021).

Water fitting	Maximum consumption
WC	4/2.6 litres dual flush
Shower	8 l/min
Bath	170 litres
Basin taps	5 l/min
Sink taps	6 l/min
Dishwasher	1.25 l/place setting
Washing machine	8.17 l/kilogram

13.102 The use of genuinely water efficient fittings can lead to significant water, energy, and financial savings. Fittings need to be selected to be rated within the central or a better performance band of the voluntary Unified Water Label or the emerging UK mandatory water efficiency label.

13.103 All other residential development proposals must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that

the water efficiency standards are met.

13.104 Part 1(c) and 1(d) relate to requirements to achieve BREEAM water efficiency credits. Building Research Establishment Environmental Assessment Method (BREEAM) applies to non-residential developments and residential developments arising from conversions and changes of use. This method provides a holistic assessment of the environmental sustainability of a development.

13.105 Part 1(e) outlines an offset approach for major development proposals that demonstrate they are unable to implement reuse measures which meet the proposed targets on site. In these circumstances a financial contribution will be secured to offset the shortfall and achieve the overall water efficiency target. Applicants will be expected to pay a price £/litre per person of demand reduction they are unable to achieve. Contributions will be used for water consumption offset to be achieved elsewhere in the borough. The methodology for calculating the financial contribution will be set out in Appendix 2.

13.106 Part 2 is an alternative methodology to encourage innovation and use of technologies that collect and/ or reuse water. To be eligible for a Thames Water Tier Two Environmental Discount, development proposals are required to demonstrate that they have incorporated water reuse technology, such as rainwater harvesting, greywater recycling, and/ or other water reuse technologies, that captures at least 50 litres of water use /property /day for reuse. Evidence, that Thames Water will grant the Environmental Discount is to be provided.

13.107 Measures to achieve Parts 1 and 2 will require 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 rainwater 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 re-use and rainwater harvesting system. Where such a system is not feasible or practical, development must demonstrate to our satisfaction that this is the case. Development proposals are expected to submit a water efficiency calculator to demonstrate how they have met this requirement.

13.108 Part 4 requires all new major development proposals to install "dual plumbing" (potable and non-potable pipework systems as well as separate rain, grey and foul water collection) and to design for the installation of rainwater harvesting and grey water re-use systems, to provide improved future resilience. Dual plumbing will allow buildings to

be connected to sources of reused water as they are developed in the future, supporting the development of a market for reused water.

13.109 As the cost of providing clean mains water is set to increase over the lifetime of developments and retrofit is often prohibitively expensive and disruptive to residents, it is required that all major new development has the facility to generate and use non-potable water for uses such as WC flushing. To this end the building's plumbing system is to be able to collect storm runoff and grey water separately for reuse while foul water can be discharged to sewer. The water distribution system also is to be able to supply fittings as sinks and showers with potable quality water, while WCs are to be fed from a separate system that can distribute non-potable water. A suitable plantroom area for the required equipment is to be identified.

13.110 In addition, Part 4 requires major and non-major residential refurbishment and change of use applications to seek to retrofit rain and greywater recycling systems in order to achieve lower water consumption rates in existing buildings, address existing inefficiencies and maximise future proofing for increasing water demand in the borough. London Plan Policy SI 5 states that retrofitting should occur wherever possible, and the retrofitting of existing spaces and buildings is also a priority of the London Sustainable Drainage Action Plan.

London Plan policies:

- SI5 Water infrastructure

Local Plan policies:

- DV7 Utilities and digital infrastructure
- CG7 Sustainable drainage

Evidence base:

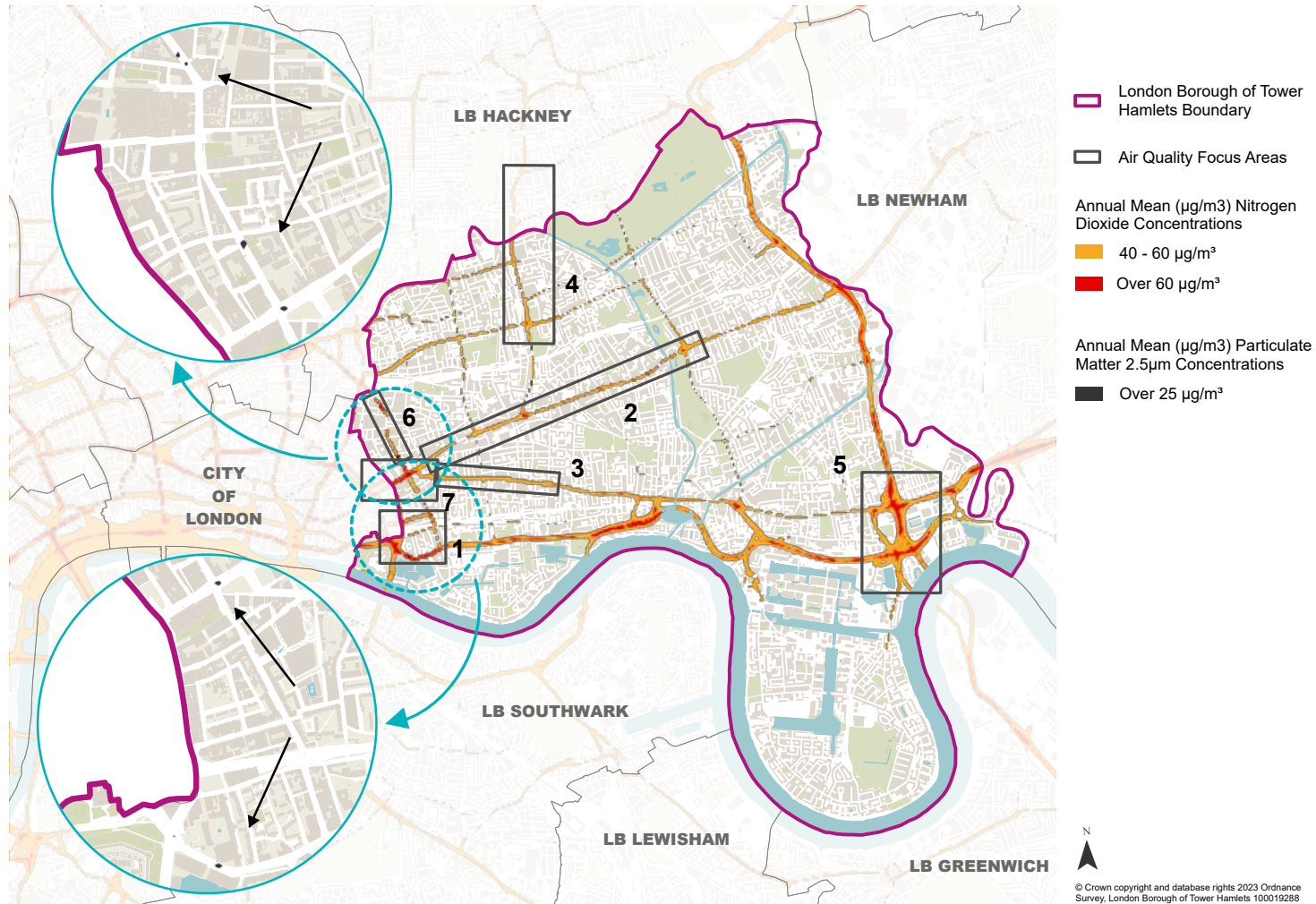
- Isle of Dogs and South Poplar Integrated Water Management Plan, 2020
- Sub-regional Integrated Water Management Strategy for the Lower Lea Valley (2023)
- Tower Hamlets Water and Drainage Offset Study (2023)
- Local Plan Topic Paper – Water Efficiency (2024)

Policy CGg Air quality

1. All development proposals should mitigate and improve poor air quality. Large-scale development proposals, and major development within Air Quality Focus Areas should achieve 'air quality positive' standards, in line with the Air Quality Positive LPG (2023). All other development proposals are required to meet or exceed the 'air quality neutral' standard.
2. An air quality impact assessment, based on current best practice, is required as part of the planning application for:
 - a. major developments proposals;
 - b. developments which will require substantial earthworks, or partial or complete demolition;
 - c. developments which include education and health facilities or open space (including child play space);
 - d. new build developments in areas of sub-standard air quality (as designated and shown on the Policies Map).
3. Where an air quality assessment indicates that a development will cause harm to air quality or where end users could be exposed to poor air quality, development will be resisted unless mitigation measures are adopted to reduce the impact to acceptable levels.

4. Measures to improve air quality should be implemented onsite. Where it is robustly demonstrated that this is not possible, off-site measures may be accepted, such as financial contributions to deliver air quality improvement measures in the Tower Hamlets AQAP.
5. New build developments proposals which provide any private, communal, publicly accessible open space or child play space in areas of sub-standard air quality are required to demonstrate that they have considered positioning and design of the open space to minimise exposure of future users to air pollution.
6. Development proposals for new residential and commercial moorings on waterways should include an electrical hook-up at each mooring point; where demonstrated that this is not possible, other clean energy alternatives such as solar panels must be considered.

Figure 8: Air quality map



Supporting text

13.111 LBTH is committed to reducing the exposure to poor air quality within Tower Hamlets. Levels of nitrogen dioxide and particulates (PM₁₀ and PM_{2.5}) are of particular concern, due to their impacts on human health²¹. Air pollution is associated with a number of adverse health impacts, which more acutely affect the most vulnerable in society, particularly children, older people, and individuals with heart and lung conditions..

13.112 Between 2017 and 2022, Tower Hamlets saw a significant improvement to air quality within the borough. In 2016, 77% of the borough's population was living in an area that exceeded the UK legal limit for nitrogen dioxide (NO₂) annual mean concentration of 40ug/m³ (micrograms per cubic metre). According to modelling projections undertaken in 2019, this had reduced to 7.5% of the Borough's population.²² This could be attributed to a number of factors, including improvements in vehicle emissions standards, update of electric vehicles, introduction of Ultra Low Emissions Zones (ULEZ) and local measures to improve air quality.²³

13.113 However, there are no safe limits for air pollution, and the health risks associated with particulate matters, PM₁₀ and PM_{2.5}, continue to be a significant cause for concern. In 2021, 7% of deaths among people in Tower Hamlets were attributed to particulate air pollution (PM_{2.5}), compared to 5.5% in England.²⁴

13.114 Air quality modelling from the London Atmospheric Emissions Inventory (LAEI) 2019 shows that the most polluting roads in the borough are along the arterial roads, including the A13, the Blackwall Tunnel Approach and the Highway. In these areas, the levels of levels of nitrogen dioxide and particulates (PM_{2.5} and PM₁₀) exceed WHO 2005 air quality guideline limits and, in the case of nitrogen dioxide, European Union safe legal limits /national air quality objectives.²⁵ The London Environment Strategy (2018) sets commitments to meet the WHO health-based interim guideline limits across London by 2030. In 2021 the WHO issued more stringent guidelines for particulate air pollution, and the council aspires to meet the updated guideline values for PM_{2.5} in the shortest possible timeframe.

13.115 In addition, seven Air Quality Focus Areas (AQFAs) have been identified in the borough. These are areas that have been identified as having high levels of pollution and human exposure, as shown on Figure 8. The AQFAs are reviewed periodically based on LAEI data, and may be subject to change in the future.

13.116 Part 1 requires large-scale development proposals and major development within Air Quality Focus Areas to adopt an 'air quality positive' approach. Air Quality Positive is a process of identifying and implementing methods to push development proposals beyond air quality neutral standards, as set out in the Air Quality Positive LPG (2023). Developments will be required to submit an Air Quality Positive statement as part of the Air Quality Assessment, in line with GLA

21 Tower Hamlets Joint Strategic Needs Assessment: Strategic Planning and Health (2016)

22 London Atmospheric Emissions Inventory (LAEI) (GLA, 2019)

23 LBTH Air Quality Action Plan (AQAP) 2022-27

24 Public Health Outcomes Framework Data, OHID (2021)

25 LBTH Air Quality Action Plan (AQAP) 2022-27

guidance, to demonstrate how benefits to local air quality have been maximised, and how measures to minimise pollution exposure will be implemented. Certain development proposals outside of AQFAs may also be required to submit an Air Quality Positive statement, this will be reviewed on a case-by-case basis by the council's Air Quality team.

13.117 All other development proposals will be required to achieve the air quality neutral benchmarks as set out in the London Plan. These benchmarks set out the maximum allowable emissions of NO_x and particulate matter based on the size and use class of the proposed development. There are two sets of benchmarks covering the main two sources of air pollution from new developments:

- Building Emissions Benchmark (BEB) – emissions from equipment used to supply heat and energy to the buildings; and
- Transport Emissions Benchmark (TEB) – emissions from private vehicles travelling to and from the development.

13.118 Both benchmarks must be achieved for a development proposal to be considered air quality neutral. Applicants should refer to the Air Quality Positive LPG and Air Quality Neutral LPG for further guidance.

13.119 Part 2 requires that an air quality assessment be undertaken for all major development proposals, proposals which will require substantial earthworks or demolition, proposals pertaining to education and health facilities or open space (including child play space), and all new development proposals within areas of sub-standard air quality (as shown on the Policies Map).

13.120 Areas of sub-standard air quality refer to areas where nitrogen dioxide levels exceeding 40 µg/m³ (the European Union legal limit / national air quality objectives). This includes areas in which the particulates (PM_{2.5}) levels exceed 25µg/ m³ annual mean levels (UK



annual limit) as identified on the Policies Map and Figure 8. Please note: air quality fluctuates and applications should be guided by the latest available monitoring data.

13.121 The air quality assessment must consider the potential impacts of pollution from the development on occupants of the site and neighbouring areas during construction and operational phases. It should also consider the cumulative impact of surrounding developments located within a 1-kilometre radius. The air quality assessment and the construction management plan should contain details of compliance with European emissions standards.

13.122 Major development proposals are also required to include a dust assessment. Proposals that would give rise to diffuse air pollution must consider the potential for effects on European sites of nature conservation importance, in particular Epping Forest.

13.123 The air quality assessment must also outline the measures to mitigate any adverse effects during construction or operation. This could include:

- reducing vehicular traffic levels;
- encouraging sustainable movement patterns;
- methods of carrying out construction;
- actions to reduce emissions throughout the lifetime of the building;
- reducing emissions from associated plant equipment;
- improving or greening the public realm; and
- ensuring decentralised energy facilities do not contribute to poor air quality.

13.124 As per Part 3, measures to reduce exposure to poor air quality could include the following (in order of priority):

- minimize g distance from pollutant source (the recommended distance would be over 50 metres from the pollution source);
- considering proven ventilation systems;
- parking considerations (in accordance with our transport policies);
- the use of winter gardens, instead of balconies;
- internal layout and minimize g internal pollutant emissions; and
- the materiality of the building envelope and any other structures.

13.125 Maximising distance from pollutant source allows for air pollution to disperse and can reduce exposure. In some cases, this could also take the form of improvements to the public realm, such as introduction of nature-based solutions that can act as a green buffer to reduce exposure to air pollution. However, green infrastructure itself is not a solution to air pollution.

13.126 As per Part 4, where it is demonstrated that measures to improve air quality cannot be delivered on site, an offsetting contribution may be agreed with the council in the form of a cash-in-lieu payment, to deliver the air quality improvement measures offsite. The method for calculating the offset payment is set out in Section 5 of the Air Quality Neutral LPG.

13.127 Part 5 requires new private, communal, publicly accessible open space, and child play spaces that are proposed in areas of sub-standard air quality to demonstrate that the positioning and design has been considered to minimise the exposure of future users, particularly vulnerable users, to air pollution. The recommended distance within the AQAP is 50 meters from the pollution source.

13.128 Moorings for residential boats are present in many locations across Tower Hamlets, and the number of such boats on waterways across London is increasing (water space study, 2017). Furthermore, a number of basins connected to the river Thames, such as Limehouse Basin and St Katharine Docks, are primarily used for residential moorings. Heating systems on houseboats are typically fuelled by burning oil, natural gas, wood, or coal. This contributes to poor air quality around the borough's waterways, with solid fuel sources (wood and coal) being the most inefficient/ polluting, leading to high levels of nitrogen dioxide and particulate matter. Part 6 of this policy therefore requires development

proposals including new moorings to provide suitable infrastructure to enable houseboats to use electricity for heating when moored. This will support the decarbonisation of houseboats in the borough and promote better air quality around the borough's waterways. Applicants are recommended to discuss their proposal for new moorings with the Canal & River Trust and Port of London Authority (PLA) where appropriate.

London Plan policies:

- GG3 Creating a healthy city
- SI1 Improving air quality

Local Plan policies:

- DV3 Healthy communities
- DV4 Planning and construction of new development
- CG5 Overheating
- HF9 Housing standards and quality

Evidence base:

- Air Quality Action Plan, 2022-2027
- Using green infrastructure to protect people from air pollution (GLA) 2019

Policy CG10 Noise and vibration

1. Development proposals are required to:
 - a. adopt good acoustic design in accordance with the Institute of Acoustics' Professional Practice Guidance (ProPG): Planning & Noise – New Residential Development, using the most appropriate layout, orientation, design, and use of buildings to minimize noise and vibration impacts;
 - b. identify and outline mitigating measures to manage noise and vibration from new development, including during the construction phase;
 - c. separate noise-sensitive development from existing operational noise; and
 - d. provide a noise assessment where noise-generating development or noise-sensitive development is proposed.
2. Where new noise-sensitive land uses are proposed in proximity to existing noise-generating uses, the 'Agent of Change' principle requires the proposal for new development to robustly demonstrate how conflict with existing uses will be avoided, through mitigation measures.

3. Development proposals are required to demonstrate that the level of noise emitted from any new heating or ventilation plant will be below the background level by at least 10dBA, or comply with guidance set out in the latest version of British Standard 4142.
4. For new residential development proposals that are located within ambient noise level areas determined to be at the significant observed adverse effect level (SOAEL) or above, the developer will be required to provide information to prospective occupants about the mitigation measures that have been put in place, to reduce the risk of post-purchase/ occupancy complaints.²⁶ This will be secured by planning obligation.

²⁶ Noise Guidance, DLUHC (2019)

Supporting text

13.129 This policy seeks to manage noise and vibration from new development and manage existing sources of noise on sensitive development. Noise and vibration can have a significant impact on local amenity and well-being. According to the WHO, excessive noise can cause a number of short- and long-term health problems, including sleep disturbance, cardiovascular effects, and cause poor performance at work and school.

13.130 The Increasingly high-density and mixed-use nature of development in Tower Hamlets means it is essential that building design and use minimises noise pollution and disturbance. Part 1 of this policy sets out measures to minimise noise from new development and separate noise-sensitive uses such as housing, hospitals, and schools from existing noise sources where practicable to protect the amenity and well-being of the surrounding area.

13.131 Where required, the noise assessment should consider the following:

- source and absolute level of the noise together with the time of day it occurs, considering day-time and night-time noise where appropriate
- for non-continuous sources of noise, the number of noise events, and the frequency and pattern of occurrence of the noise;
- pitch and tone of the noise;
- the cumulative impacts of more than one source should be taken into account along with the extent to which the source of noise is intermittent and of limited duration; and
- 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.

13.132 Where the avoidance of noise conflicts is impractical, mitigation measures such as effective soundproofing for noise attenuation (e.g. appropriate glazing and building materials) and restrictions on operating hours will be implemented through appropriate planning conditions. The cumulative impact of mitigation measures to reduce noise must be considered alongside measures taken to reduce overheating and exposure to poor air quality.

13.133 There have been several examples across London of long-standing entertainment venues closing or becoming at risk of closure due to a combination of factors, including noise complaints from new residents and venues being purchased for redevelopment (particularly for housing). This has implications for the long-term future of London's creative and cultural sector which has an impact not just on residents but also its tourism potential.²⁷ Part 2 uses the Agent of Change principle to seek to reduce this phenomenon. This principle may also apply to other noise-generating uses, such as schools, sporting and entertainment venues, industrial sites, waste sites, safeguarded wharves, rail, and other transport infrastructure. The Agent of Change principle places responsibility for noise management on the incoming individual or business. 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 it has not been robustly demonstrated that the operations of nearby uses would not be compromised, development proposals will be refused.

13.134 Part 3 sets requires heating and ventilation plants to be designed

²⁷ Rescue Plan for London's Grassroots Music Venues Update, (GLA, 2017)

so that they do not adversely affect nearby amenities, including open spaces, which are valued for their quiet environment. At present, the level of noise emitted from any new heating or ventilation plant must be below the background level by at least 10dBA. However, it is understood that British Standard 4142 will be updated in the near future, and this policy should be read to reflect these updated requirements.

13.135 Significant observed adverse effect level (SOAEL) is the level of noise exposure above which can have a significant adverse effect on health and well-being. Part 4 requires developers of residential units in SOAEL areas to provide information to prospective occupants about the noise mitigation measures that have been put in place. This is to ensure that prospective buyers and occupants are made fully aware of the effects of noise in the area and the mitigation measures that have been implemented to reduce the risk of post-occupancy noise complaints. This will be secured by planning obligation.

13.136 Appendix 5 provides further guidance on how this policy will be implemented.

London Plan policies:

- D13 Agent of Change
- D14 Noise

Local Plan policies:

- DV4 Planning and construction of new development
- HF9 Housing standards and quality
- CG5 Overheating



Policy CG11 Contaminated land and storage of hazardous substances

1. Where development is proposed on contaminated land or potentially contaminated land, a desk study, site investigation, and risk assessment in line with current guidance and the Tower Hamlets Contaminated Land Strategy (2022) is required and remediation proposals agreed to deal with the contamination before planning permission is granted.
2. Development proposals will not be supported which involve the storage or use of hazardous substances or which are located in close proximity to hazardous installations where it would cause a significant threat to health and the environment.
3. Certain contaminating developments, processes or land uses proposed within or in close proximity to sensitive locations, including source protection zones, may not be acceptable.

Supporting text

13.137 Part 1 of this policy provides additional guidance on protecting health of the borough's residents and workers and the environment from contaminants and hazardous substances. This should be read in conjunction with the guidance set out in the London Plan.

13.138 Contaminated land is land that has been polluted with harmful substances to the point where it now poses an unacceptable risk to health and the environment. Tower Hamlets has a history of industrial land uses and this policy seeks to ensure that the impacts of these past and current land uses do not affect the health of people and the environment. An updated public register of contaminated land is available on the Tower Hamlets website, and any site included in the register or any site which is potentially contaminated will be required to carry out a site investigation and agree a scheme of mitigation with the council to ensure that contaminated land issues are considered at the planning application stage.

13.139 Contamination applies not only to land and soil contamination, but to groundwater contamination. Development proposals should protect and enhance groundwater quality, and should not have any adverse impact on groundwater flow, quantity or quality. A verification report will be required through condition to provide confirmation that the remediation work has been undertaken properly in line with best practice.

13.140 Part 2 of the policy relates to the management of hazardous substances which are outlined in the Planning (Hazardous Substances) Regulations (2015). There are a small number of listed hazardous installations in or near to the borough. Hazardous substances are also controlled by the need for a separate hazardous substances consent. As

such, it will be necessary to demonstrate that any developments which involve hazardous substances would not cause a significant hazard to the health and well-being of local residents or to the local environment.

13.141 The council will apply the Health and Safety Executive's (HSE) land use planning methodology in the event of a proposal being located near to a hazardous installation. In combination with advice provided by the HSE, 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 arising from the proposed development would significantly outweigh the potential risks to health and the local environment.

13.142 Source protection zones are spatial areas around public drinking water abstraction points. Locations of source protection zones are available on the Environment Agency's website. Applicants are advised to speak to the council's environmental health service and the Environment Agency, where relevant.

London Plan policies:

- SD1 Opportunity Areas

Local Plan policies

- DV3 Healthy communities
- DV4 Planning and construction of new development

Evidence base:

- Strategy For the Identification of Contaminated Land, 2022

14. People, places and spaces



PS1 – Design-and infrastructure-led approach to development

PS2 – Tall buildings

PS3 – Securing design quality

PS4 – Attractive streets, spaces and public realm

PS5 – Creating inclusive places

PS6 – Heritage and historic environment

PS7 – World heritage sites

PS8 – Shaping and managing views

PS9 – Shopfronts

PS10 – Advertisements, hoardings and signage

PS11 – Siting and design of telecommunications infrastructure



Introduction

14.1 This chapter focuses on delivering places and spaces in the borough that are designed around the needs of local communities for good-quality housing and a reduction in overcrowding, ensuring that Tower Hamlets is a borough that everyone can feel proud to live in and excited to spend time in. The policies in this chapter seek to ensure that new development takes place in a way that complements the existing character of our places, while taking advantage of the potential capacity for growth that some parts of the borough demonstrate. They require new development to be well-designed, safe, accessible, and inclusive, and to pay careful attention to the layout, scale and form of buildings

and spaces, the connections between them, and the mitigation of their impacts, such as noise and air pollution. The policies in this section also provide a framework for ensuring that new development respects and enhances the natural and built heritage of the borough. Through good design, development should contribute to the health, well-being, and social inclusion of the borough's communities.

14.2 At the same time, the policies in this section also take a new approach to tall buildings, allowing the consideration of greater height across more of the borough. Taller buildings will still be restricted in sensitive areas, such as conservation areas and nature sites, but beyond these places tall buildings will be considered and assessed in line with the requirements of policy PS2. This will help to optimise housing capacity, and provide an uplift in affordable housing.

14.3 Tower Hamlets consists of a number of distinctive, diverse, and vibrant places, including historic hamlets, ancient markets, urban parks, inland docks, urban farms, a world heritage site, and many other types of place. These places have evolved gradually over many years and their characteristics, both modern and historic, make up the distinct identity of the borough. The diverse places and communities of the borough also contribute to the character of the wider East End of London.

14.4 Tower Hamlets is experiencing high levels of growth and development and has done so for many years; it is important to ensure that the borough can successfully accommodate continued change and growth while also preserving those distinctive elements that are so valued by local communities and by those who come to Tower Hamlets from further afield for employment or leisure.

14.5 This section contains the following policies:

- PS1 – Design-and infrastructure-led approach to development
- PS2 – Tall buildings
- PS3 – Securing design quality
- PS4 – Attractive streets, spaces and public realm
- PS5 – Creating inclusive places
- PS6 – Heritage and historic environment
- PS7 – World heritage sites
- PS8 – Shaping and managing views
- PS9 – Shopfronts
- PS10 – Advertisements, hoardings and signage
- PS11 – Siting and design of telecommunications infrastructure

Policy PS1 Design-and infrastructure-led approach to development

1. The council will support development proposals that are design-led and respond to a site's context and capacity for growth to determine the appropriate form and land use for the site and where they deliver on the borough's needs for housing, employment, retail, and community space, and to create sustainable communities. All development proposals should demonstrate how the proposed capacity of the development has been informed by:

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- a. the form and layout of the site, within its context, including appropriate scale, height and massing;
 - b. the experience of future and existing residents and users of the site;
 - c. the quality and character of the proposed development;
 - d. the character of the 24 places of Tower Hamlets, as set out in the council's Urban Structure and Characterisation Study;
 - e. the capacity for growth of the site, as set out in figure 9; and
 - f. robust community engagement and co-design from an early stage in the design process.

2. The council has determined design principles, indicative capacities, and appropriate heights for site allocations through a design-led approach. The council will support development proposals that conform to the requirements of site allocations.

3. Where a development proposal exceeds the capacity or height set out in a site allocation, the council will only support it where a further design-led approach can demonstrate that the proposal will be appropriate to the site and its context, is sustainably designed, and that there is sufficient infrastructure (either existing, planned, or to be delivered through the development) to support the proposed capacity.

4. The council will require certain development proposals to be accompanied by a site-specific infrastructure impact assessment to establish the additional requirements for infrastructure that will be created by the proposal, beyond what is planned for in the Local Plan, and how these requirements will be delivered. These assessments will be required for:

- a. proposals on site allocations which exceed the capacity or height set out in the allocation;
- b. proposals for 500 or more homes on unallocated sites; and
- c. proposals for tall buildings on unallocated sites that exceed the height limits set out in policy PS2.

5. The council will support development proposals to be accompanied by design codes, setting out clear design expectations for the site that respond to its surrounding context and reflecting effective community engagement in their preparation. On site allocations in multiple ownership, the council will support development proposals to be accompanied by a joint design code for the site, developed in collaboration between the different landowners.

Supporting text

14.6 Tower Hamlets is a small borough in geographical terms, so opportunities for development are limited. Thus, to meet our ambitious targets for good-quality housing, to address overcrowding, and to enable sustainable placemaking, an increase in density is generally supported across the borough. But this increase in density needs to have high-quality design as a key focus with the borough's housing needs in mind, and needs to be proportionate to the capacity of the borough to absorb the increase in terms of infrastructure (both social and physical) and the creation of positive places through elements such as townscape and multi-functional public realm in order to deliver successful and sustainable places.

14.7 This policy aims to ensure that new development is well-designed and proposes sustainable capacities and densities to create high-quality places for our residents to live. It incorporates the requirements of the new London Plan for all sites to optimise their capacity through a design-led process. This will help to ensure that new development creates attractive, liveable places that existing and future residents are proud to live in. The London Plan Guidance on Optimising Site Capacity makes clear that optimising site capacity does not mean maximising the density of a site. Instead, it means "responding to the existing character and distinctiveness of the surrounding context and balancing the capacity for growth, need for increased housing supply, and key factors such as access by walking, cycling and public transport, alongside an improved quality of life for Londoners. Capacity-testing should be the product of the design-led approach, and not the driver" (paragraph 1.1.1.).

14.8 In design terms, an increase in density will not always mean taller buildings are needed or appropriate. Increased density can be achieved in multiple ways, and in many cases a lower-rise form of density may be



the more appropriate option, while still providing a significant increase in housing or other uses. However, in other cases, the use of tall buildings may allow for greater density than could otherwise be achieved on smaller or otherwise constrained sites, thus allowing for a greater contribution towards meeting the borough's housing needs. A design-led approach to sites will allow us to determine this. See Policy PS2 for more details on the approach to tall buildings.

14.9 Part 1 sets out that proposals should follow a design-led approach in line with the London Plan and the National Design Guide. The National Design Guide says that "well-designed places and buildings come about when there is a clearly expressed 'story' for the design concept and how

it has evolved into a design proposal. This explains how the concept influences the layout, form, appearance, and details of the proposed development. It may draw its inspiration from the site, its surroundings, or a wider context" (paragraph 16). This is consistent with the approach to design-led development set out in London Plan policies D1, D2 and D3 and the council's expectation that proposals will demonstrate a clear rationale for their design.

14.10 Proposals should demonstrate that they have considered:

- The form and layout of the proposal – how does the layout, scale, and appearance of the building relate to the character of the area and existing and proposed street layouts? Are they aligned with people's patterns of movement in the area, and encourage further permeability and connectivity? Are the designs street-based, with clearly defined private and public spaces, and do they encourage active travel and enable people to feel safe moving around the space?
- Experience – does the proposal provide an attractive, welcoming space for residents, nearby communities, and others who may use the development or the surrounding public realm, including marginalised groups? Are there spaces for play, relaxation, social interaction and physical activity? Does the proposal promote community health and well-being? Does the proposal provide adequate privacy for residents, while also allowing for active frontages and a positive relationship between the inside and outside of the buildings to allow people to feel safe and comfortable using the space? Does the proposal reflect the needs of all members of the community, including families, larger households, and those who may inhabit the low cost rented units - both in terms of the quality of the homes



- themselves, but also in relation to the general layout of the building, and the public and private amenity spaces.
- Quality and character – is the development of high architectural quality, with attention paid to architectural details and materials, and consideration given to the potential uses of different spaces? Will the proposal be built to meet high sustainability standards, and to maximise green spaces and sustainably manage flood risks? Does the proposal identify valued features and characteristics of the surrounding area, and make a genuine attempt to contribute towards the positive aspects of the local character?

14.11 As part of this design-led approach, proposals should also take into account the specific character and capacity for growth of different areas of the borough, as set out in two evidence base documents.

14.12 The Urban Structure and Characterisation Study (2009, and a 2016 addendum) defined 24 specific 'places' or neighbourhoods within Tower Hamlets, and set out what makes those places unique. This study can provide a starting point for understanding how a development site fits within the wider context of its surrounding neighbourhood and can help to determine positive elements of local character that can be accentuated through new development.

14.13 The Characterisation and Growth Study (2023) takes a more granular approach and characterises the specific building typologies of small areas of the borough. It then assesses them for coherence, design quality, and sensitivity to change, and determines their capacity for growth – set out for each area as 'conserve', 'enhance', or 'transform', as shown on figure 9. The capacity for growth as set out in this document does not determine what development should be proposed on a site, and does not imply that there are areas where no development would be possible. Instead, it is a starting point for a design-led process, allowing for consideration of what would be the most appropriate form within each area.

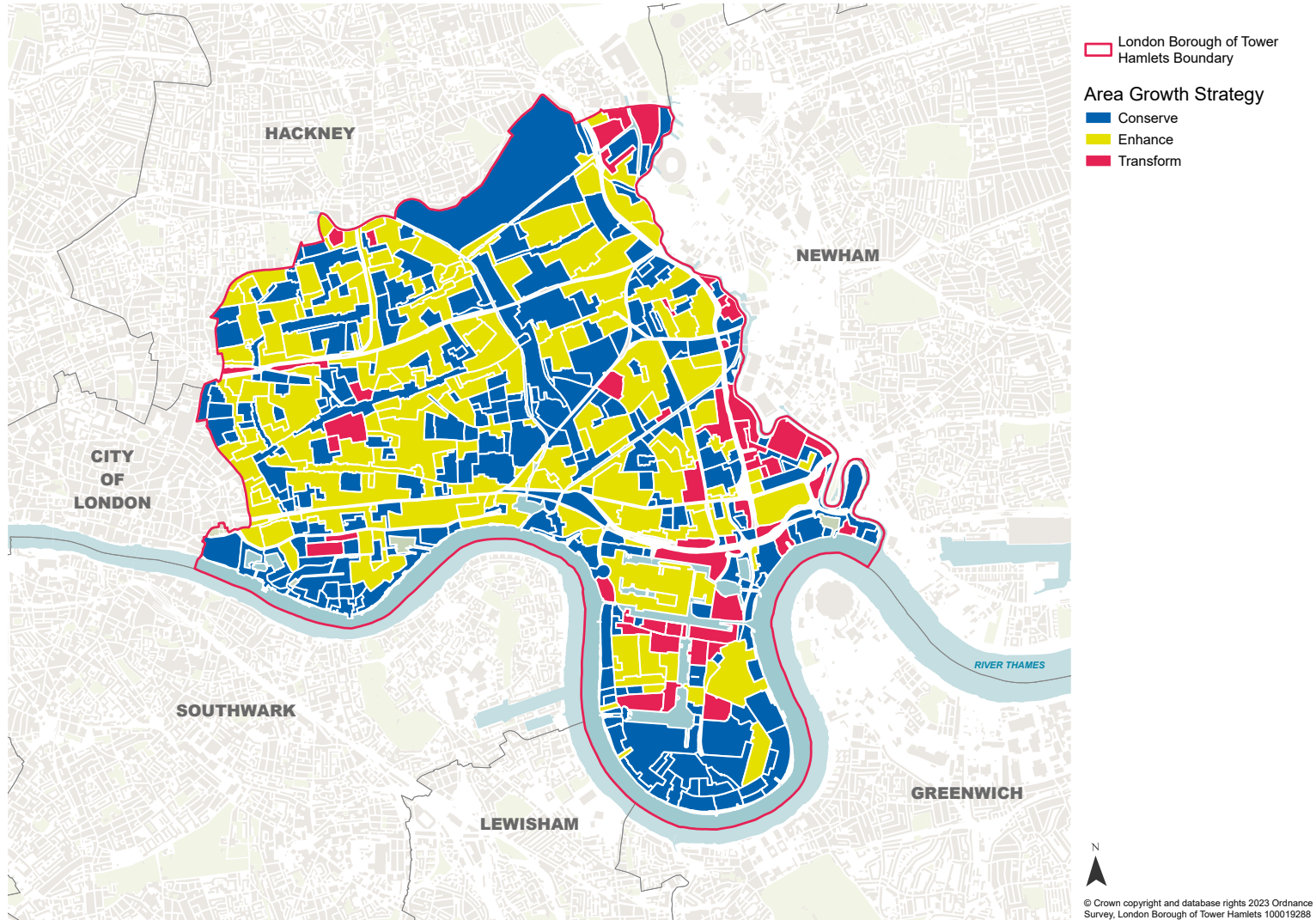
The three types of growth area can be understood as follows:

- 'Conserve' areas have consistently high quality and coherent character. This can include conservation areas, which are designated for their heritage significance, but can also include areas of more modern development which have a positive character. In these areas, change and growth can take place, but must be

undertaken sensitively to maintain the existing character and quality. Development coming forward in 'conserve' areas should draw on the predominant typology and architecture in the area and reflect this in its proposal. Materiality and detailing should reflect or positively respond to the local vernacular while development heights should normally closely resemble the prevailing height.

- 'Enhance' areas have mixed design quality and may be less coherent than 'conserve' areas. These areas offer potential for incremental change to enhance the overall character of the area. While there is an opportunity for new forms of design and architecture in these areas, any proposal should respect and draw on the special and valued features of the existing area. The height of a new development should be sensitive to the prevailing heights in the area, while also recognising the potential for increased heights on adjacent sites within 'transform' areas. There may be opportunities for a transition in height on appropriate sites and there is the opportunity for the materiality and detailing to reflect the local vernacular.
- 'Transform' areas are places where an opportunity exists to establish a new character, due to the poor quality of the existing character – many of these areas are vacant brownfield sites suitable for significant development. This may also offer the potential to intensify development both in respect of development floorspace and height. Many of these areas have been identified for change through regeneration area designations or site allocations. New development should both enhance positive elements where they exist and improve the physical character through placemaking to create attractive new places.

Figure 9: Growth areas in Tower Hamlets



14.14 Consultation, early engagement, and negotiation are all necessary key elements of a design-led approach and can help to ensure that the final proposals as submitted will be well-designed and supported by the community. Consultation with affected communities should take place at the earliest possible stage in the design process and should inform the design rather than only responding to proposals. Consultation with diverse and representative groups, including those with protected characteristics, is particularly important, to ensure these groups have their voices heard and their needs taken into account in the design process.

14.15 All strategic developments will be expected to be submitted to the Tower Hamlets Quality Review Panel as part of the design process, and this may be agreed as part of a Planning Performance Agreement. Some smaller proposals may also be referred to the panel, particularly in instances where there are concerns around elements of the design, or where they may have significant effects on heritage assets. Proposals are usually expected to be presented to the panel twice, once at pre-application stage and once at application stage, and applicants should be prepared to explain how the comments of the panel have been addressed.

14.16 Part 2 sets out how this process is to be followed on site allocations. The council has undertaken a high-level design-led site capacity assessment for allocated sites, which has led to an understanding of the design principles, indicative capacities and appropriate heights that will be considered suitable on allocated sites. Proposals that conform to these capacities and heights, and meet the other principles set out in the site allocations, will be supported.



14.17 It is recognised that multiple design options may be acceptable on a single site, so there may be alternative options that could potentially increase capacities. Part 3 sets out that this must be robustly justified through the design-led approach. Allocated site capacities are based on an understanding of available infrastructure capacity, so increases will need to be acceptable in design terms but also demonstrate that there will not be a negative effect on infrastructure capacity, or that such effects are mitigated through delivery of additional infrastructure through the development process.

14.18 Part 4 sets out the requirement for an assessment of the impacts on infrastructure as a result of the proposed development. The Local Plan and supporting evidence base, sets out the infrastructure to support the amount of development identified in the Plan over the period to 2038. Part 4 of this policy identifies circumstances that will increase the amount of development beyond what is planned for, and hence it is necessary for such proposals to identify how they will mitigate the additional impacts created. Infrastructure impact assessments are therefore required for allocated sites that exceed allocated capacities or heights, but also on unallocated sites that are delivering above the 500-home threshold used to assess site allocations. In addition, proposals for tall buildings outside of site allocations that are expected to exceed the height limits set out in policy PS2 will also be expected to submit infrastructure impact assessments.

14.19 Infrastructure impact assessments should demonstrate the expected impact of the development on the provision of local and strategic infrastructure, including but not limited to:

- education – early years, primary, secondary, and specialist;
- healthcare – primary care provision, adult social care provision;
- sports and leisure facilities – sports halls, swimming pools, pitches;
- publicly accessible open space;
- community presence facilities (i.e. Idea Stores);
- community facilities;
- youth facilities;
- energy infrastructure and utilities; and
- emergency services.



14.20 The infrastructure impact assessment should, in line with London Plan policy D2, "have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make". The infrastructure delivery plan is based on an assessment of expected densities of development within the borough during the lifetime of the plan, and developments that exceed these densities should therefore clearly highlight the additional impacts that increased density is likely to have on infrastructure requirements, and how the additional infrastructure needs that are created will be provided for. This should be determined in discussion with the council, and developers are encouraged to open such discussions at the earliest possible point in the

process. The council recognise that more development will likely equate to more CIL, however an infrastructure impact assessment should still consider costs as well as the wider context within which infrastructure is delivered, including land availability and affordability, location and accessibility, and deliverability. This may involve the consideration of delivery beyond the proposed scheme. In line with the London Plan Policy D2, "Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure".

14.21 Where infrastructure impacts have been considered in other submitted documents, such as environmental, transport, or utility assessments, this information should not be repeated, but instead referenced clearly in an infrastructure impact assessment. The infrastructure impact assessment document should focus on the resulting impacts and actions to be taken by the applicant to mitigate those impacts.

14.22 The NPPF encourages the creation of design codes by both local authorities and developers, and part 5 of this policy encourages the creation of such codes. In the case of strategic developments, which can have a significant impact on the local area, the development of design codes can support delivery of new development and encourage public support. They can also ensure that important design elements of a scheme are fully considered at an early stage of development. Some of the site allocations in this plan cover land that is owned by multiple parties, and in these cases a design code produced jointly between these different landowners can ensure that development comes forward in a coordinated manner and help to ensure that proposals on different parts of the allocations can be considered appropriate in design terms

and given permission. The development of design codes should be discussed with the council and should be subject to early engagement with local communities, to ensure that proposals are appropriate to the local context and can effectively support the delivery of new development.

London Plan policies:

- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D5 Inclusive design
- E11 Skills and opportunities for all

Local Plan policies:

- HF1 Meeting housing needs
- HF2 Affordable housing and housing mix
- HF4 Supported and specialist housing
- HF5 Gypsy and Traveller accommodation
- HF6 Purpose-built student accommodation
- HF7 Large-scale purpose built shared-living
- HF8 Housing with shared facilities (houses in multiple occupation)
- HF9 Housing standards and quality
- EG1 Creating investment and jobs
- TC1 Supporting the network and hierarchy of centres
- Cl1 Supporting community facilities
- BO1 Green and blue infrastructure
- MC1 Sustainable travel
- MC2 Active travel and healthy streets

Evidence base:

- Tower Hamlets Capacity Study, 2024
- Brick Lane and Pedley Street Site Capacity Study, 2024
- Characterisation and Growth Study, 2023
- Whitechapel North and South – Vision and Site Capacity Assessment, 2023
- Gender Inclusive Design: Creating a safe, inclusive and restorative borough, 2023
- Securing Design Quality – A Practice Note, 2023
- Optimising Site Capacity: A Design-Led Approach LPG, 2023
- Characterisation and Growth Strategy LPG, 2023
- National Design Guide, 2021
- National Model Design Code, 2021
- Statement of Community Involvement, 2019
- Urban Structure and Characterisation Study and Addendum, 2009, 2016

Policy PS2 Tall buildings

1. Within Tower Hamlets, a tall building is defined as one which is 30m or more in height measured as the height above ground level to the uppermost part of the structure.
2. Areas considered suitable for tall buildings are shown on the policies map and in figure 10, divided into zones A-F. Development of tall buildings will be supported within zones A-E, and in zone F where appropriate; and within site allocations, as set out in table 4 and within the site allocations chapter of this plan.
3. All proposals that include tall buildings must demonstrate how they provide significant public benefits; and residential proposals that include tall buildings must meet the affordable housing requirements set out in Policy HF2, including provision of 40% affordable housing, with 85% of that affordable housing delivered as social rented homes.
4. Proposed heights must take account of:
 - a. the need for variation in heights within a particular development proposal and across different development proposals within an area;
 - b. the need to avoid harm to the significance of heritage assets, areas of ecological importance, or the enjoyment of the borough's open spaces;
 - c. impacts on daylight, sunlight, and overshadowing for neighbouring land and developments;
 - d. the need to maintain sky views from street level from within clusters of tall buildings; and



- e. appropriate heights within specific allocations or appropriate heights within tall building zones, as set out in table 4 and figure 10.
5. All proposals for tall buildings must demonstrate how they meet the following design criteria in order to deliver high-quality development:
 - a. promote the health and well-being of all residents and other users;
 - b. be of a height, scale, mass, volume, and orientation that is proportionate to their role, function and the importance of the

location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings;

- c. achieve exceptional architectural quality and innovative and sustainable building design, using robust, durable, attractive, and contextually appropriate materials throughout the building, and responding to the local character in the architectural language of the development;
 - d. enhance the character and distinctiveness of an area without adversely affecting designated townscapes and landscapes (including building/roof lines);
- take account of, and avoid causing harm to the significance of, national or borough-designated landmarks, heritage assets, Conservation Areas, key views and other historic skylines, and their settings;
- f. provide a positive contribution to the skyline during both the day and night time;
 - g. maintain adequate distance between buildings to ensure a high-quality ground floor experience and enhanced environment;
 - h. present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level;

- i. provide an adequate quantum of high-quality communal open space, play areas and public realm (where residential uses are proposed), and where appropriate provide shared facilities at the ground floor level to encourage social cohesion;
- j. demonstrate that the development does not adversely impact on the microclimate and amenity of the application site and the surrounding area;
- k. demonstrate consideration of public safety requirements as part of the overall design, including the provision of safe evacuation routes and two staircases;
- l. comply with civil aviation requirements and not interfere to an unacceptable degree with telecommunications, television and radio transmission networks and river radar equipment;
- m. not prejudice future development potential of adjacent/ neighbouring buildings or plots; and
- n. within Source Protection Zones, consider the importance of managing risks to groundwater resources that could be caused by deep-piled foundations.

6. Proposals for tall buildings should consider incorporating public viewing galleries within the development where appropriate.

7. Proposals within designated tall building zones should apply the following principles, as part of ensuring appropriate development of the townscape of the borough:

Table 3: Tall building zone principles

Tall building zone	Principles
Zone A (Aldgate)	<ul style="list-style-type: none"> a. This zone has a primarily office/commercial character. b. Building heights in this zone should step down towards the southern edge of this zone. c. An appropriate height for taller points in this zone is between 60-80m AOD. Appropriate heights on individual sites will be dependent upon the impact on heritage assets and their settings, including the protected view of the Tower of London from the Queen's Walk. Development must protect this view, and this may lead to a limitation of building heights on particular sites where this is necessary to preserve the view and the outstanding universal value of the Tower of London.
Zone B (Canary Wharf)	<ul style="list-style-type: none"> a. This zone has a primarily office/commercial character in the centre, with increasingly residential character at the western, eastern, and northern edges. b. Development within this zone will be expected to positively contribute to the skyline of strategic importance and maintain the iconic image and character of Canary Wharf as a world financial and business centre.
Zone C (Marsh Wall and Millwall Inner Dock)	<ul style="list-style-type: none"> a. This zone has a primarily residential character. b. Building heights along Marsh Wall should step down from the Canary Wharf TBZ to support its central emphasis c. Building heights should step down further from Marsh Wall and ensure that the integrity of the Canary Wharf TBZ is retained on the skyline when seen from places and bridges along the River Thames across Greater London, particularly in views identified in Policy PS8. d. Building heights should be consistent with the protection of London View Management Framework views, particularly those from Greenwich and the setting of Tower Bridge. e. An appropriate height for the tallest new developments in this zone is 180m AOD.
Zone D (Blackwall)	<ul style="list-style-type: none"> a. This zone is of mixed residential/commercial character. b. This zone should remain lower in height and separated from the nearby Canary Wharf zone. c. Development heights should step down towards the western, northern, and eastern edges of this zone, and buildings should be of varying heights allowing sky views between them when viewed from the river or the Greenwich peninsula. d. An appropriate height for the tallest point in this zone is 130m AOD.

Tall building zone	Principles
Zone E (Leamouth)	<ul style="list-style-type: none"> a. This zone has a primarily residential character. b. Tall buildings in this zone should respect the primacy of the Canary Wharf zone, and step down towards the River Thames and the East India Dock Basin and ensure glimpses and views across the zone. c. An appropriate height for the tallest point in this zone is 90m AOD.
Zone F	<ul style="list-style-type: none"> a. This zone consists of all areas suitable for tall buildings that do not fall within zones A to E. This zone has a mixed character, with variations across different neighbourhoods. b. Tall buildings in this area should show a variation in height to create a varied and interesting townscape, and should respond sensitively to the surrounding context. c. In locations where this zone is adjacent to zones A to E, heights within this zone should respond to the principles set out for zones A to E above, including through an appropriate step-down in height from adjacent developments. d. The tallest points should cluster around rail transport stations and within town centres. e. Buildings and clusters of buildings within this zone should not undermine the prominence of tall building zones A to E as the principal points of height in the borough. f. An appropriate height for the tallest points in this zone is 70m AOD.
Site Allocations	<ul style="list-style-type: none"> a. Proposals within site allocations should apply the design principles set out in the respective allocations in Section 4 of this plan. b. Height for new development should not exceed the heights set out in the allocations and in table 4.

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8. Proposals that are within a Tall Building Zone but adjacent to an area that is not suitable for tall buildings should demonstrate careful consideration of heritage concerns and how to appropriately transition between greater and lesser heights without undermining the significance of the borough’s heritage assets or publicly accessible open spaces.

Supporting text

14.23 This policy seeks to guide and manage the location, scale, and development of tall buildings in the borough in line with the requirements of the London Plan. In recent years, Tower Hamlets has consistently been one of the London boroughs with the largest pipeline of tall buildings under development, and with some of the tallest buildings in London. The significant amount of tall buildings being planned and constructed in the borough are important contributors to meeting high housing targets, and can also make an important contribution to affordable housing. However, tall buildings can also bring negative impacts for residents if poorly designed, such as creating poor microclimates with excessive wind, shadowing, or overheating, which can create unhealthy and dangerous places to live. For example, research undertaken for the High Density Living SPD found that 35% of residents living in the areas around high-density schemes including tall buildings felt that the buildings blocked sunlight to their homes; 40% of residents in high-density schemes said their homes overheated in the summer, and those living above the 20th floor were less comfortable opening their windows to help cool rooms down; and 34% of residents surveyed felt that high-density developments were damaging their privacy. The negative impacts of poorly designed tall buildings can also affect the wider area and detract from the iconic skylines of the borough or damage the significance of heritage assets. Therefore, it is important that the council ensures that tall buildings which come forward are of the highest possible quality and make a positive contribution to the borough, in order to ensure that we deliver the high-quality housing that is needed to meet our ambitions for providing homes and addressing overcrowding.

14.24 This policy takes a new approach to tall buildings from that previously implemented in Tower Hamlets. Under this plan, greater



height will be considered in a wider range of locations across the borough, with the additional density provided by these developments balanced out by a correspondingly greater level of affordable housing delivery. Important locations, such as conservation areas and nature sites, will still be protected from the potential negative impacts of taller buildings, but a greater level of height and densification will be considered in less sensitive areas of the borough, and should be focused around locations with high levels of accessibility to transport, shops, and other facilities.

14.25 Part 1 sets out a definition of tall buildings in Tower Hamlets, which is 30m height above ground level to the uppermost part of the structure,

including any plant or antennae. Sites that are below this height will not need to show consideration of the rest of the tall buildings policy, though they will have to comply with all remaining design policies in the Local Plan. Sites that are above this height will need to meet the remaining requirements of this policy, even when they are in locations identified as suitable for tall buildings under part 2 of the policy. When stating the height of a tall building as part of an application, in addition to the storey height, this should be described in metres and the height above ordnance datum (AOD).

14.26 Part 2 sets out the council's approach to the locations of tall buildings. Due to the exceptional need for affordable housing in the borough, and the ability of tall buildings to increase density and therefore increase the amount of affordable housing delivered, the council considers that there should be a relatively permissive approach to tall buildings in Tower Hamlets. Conservation areas, listed buildings, protected view corridors, and open spaces (where development would generally not be allowed anyway) are considered to be the only locations that are not acceptable on principle for tall buildings of some form. Proposals for tall buildings in these areas will not be supported. However, the rest of the borough is considered to be suitable for tall buildings of various heights. These tall building areas can be understood as falling into three categories:

- Site allocations – these are specific locations where the potential for significant development has been identified. The details of site allocations are set out in section 4 of this plan and include design principles and appropriate acceptable heights. These appropriate acceptable heights will vary from site to site, depending on location

and context. All site allocations are expected to be able to deliver at least 500 new homes, and in some cases much more than this.

- Tall building zones A-E – these are the locations in the borough that are most appropriate for the tallest buildings. These areas already contain clusters of tall buildings, and in many cases contain other tall buildings under construction or with planning permission.
- Tall building zone F – this consists of the remaining areas of the borough that are considered suitable for tall buildings. By its nature, this area is geographically diffuse, including areas with a variety of different characters from town centres through to purely residential areas. Given the existing character of these areas, while they are considered suitable for some additional height, they should not be the locations for the tallest buildings in the borough, which should be concentrated in zones A-E.

14.27 The tall buildings zones are set out in figure 10 below. Appropriate heights for the tallest points- within each zone, and appropriate heights within the site allocations, are set out in table 4 below. Further principles for the development of these different zones are set out in part 6 of the policy.

Figure 10: Tall building zones

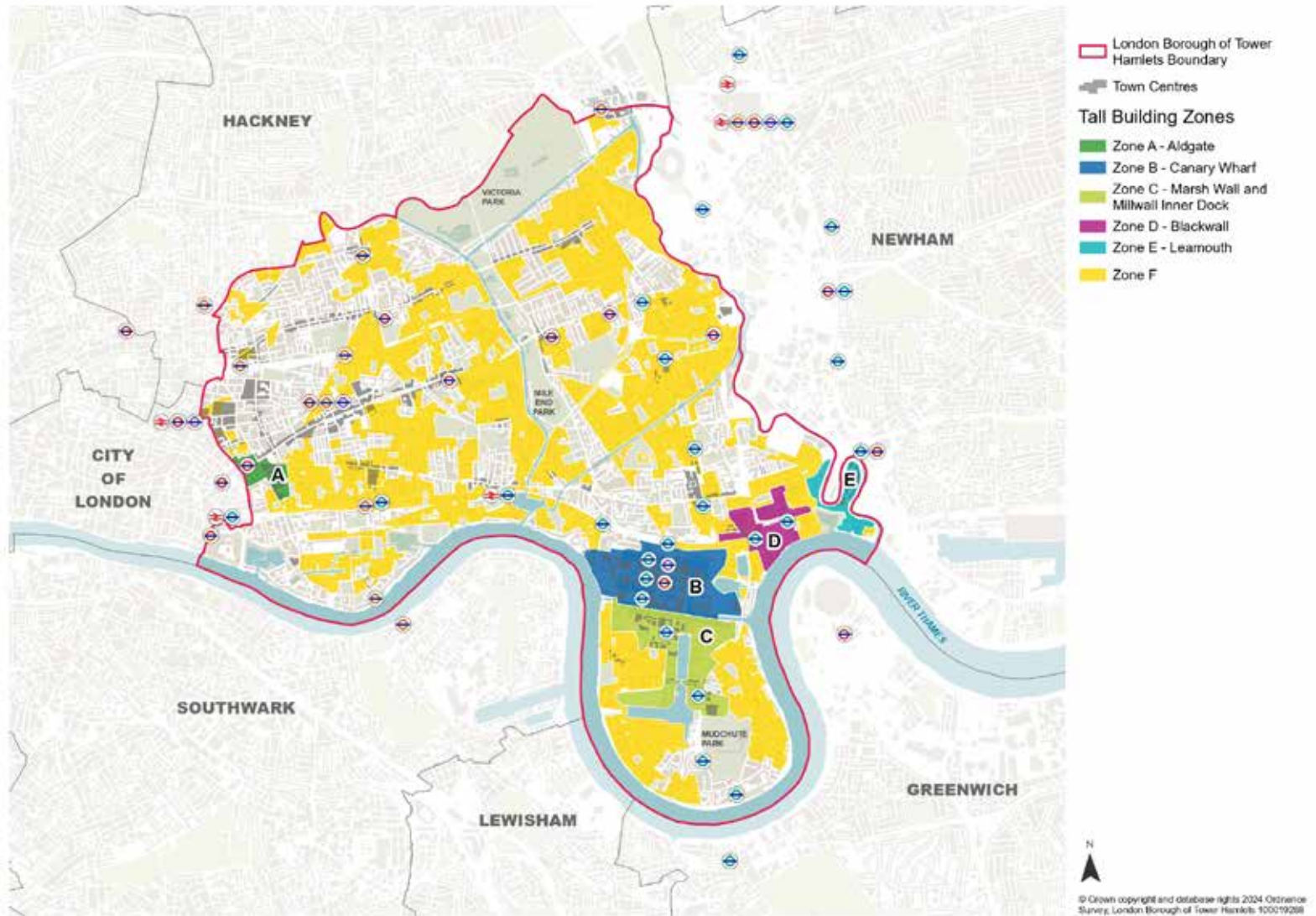


Table 4: Appropriate heights in tall building zones and for site allocations

Site allocation	Appropriate height for new development
1.1 Bishopsgate Goods Yard	105m AOD (Tower Hamlets side)
1.2 London Dock	89m AOD
1.3 Marian Place Gasworks	57m AOD
1.4 Whitechapel South	88m AOD
1.5 London Metropolitan University	63m AOD
1.6 Whitechapel North	52m AOD
1.7 Brick Lane and Pedley Street	70m AOD
2.1 Bow Common Lane	89m AOD
2.2 Chrisp Street	88m AOD
3.1 Ailsa Street	80m AOD
3.2 Leven Road	76m AOD
3.3 Aberfeldy Estate	80m AOD
3.4 Bromley-by-Bow	50m AOD
3.5 Blackwall Trading Estate and Leamouth Road Depot	N/A
3.6 Hackney Wick Station	43m AOD
3.7 Hepscott Road	32m AOD
3.9 Sweetwater	36m AOD
3.10 Teviot Estate	50m AOD
4.1 Aspen Way	91m AOD

Site allocation	Appropriate height for new development
4.2 Billingsgate Market	N/A
4.3 Crossharbour	115m AOD
4.4 Limeharbour	N/A
4.5 Marsh Wall East	N/A
4.6 Marsh Wall West	230m AOD
4.8 Millharbour	146m AOD
4.9 North Quay	N/A
4.10 Reuters	139m AOD
4.11 Riverside South	N/A
4.12 Westferry Printworks	110m AOD
4.13 Wood Wharf	N/A
4.14 10 Bank Street	N/A
4.17 Westferry and Park Place	N/A
Tall Building Zones	Appropriate height for tallest point in the zone
Tall building zone A – Aldgate	80m AOD
Tall building zone B – Canary Wharf	N/A
Tall building zone C – Marsh Wall and Millwall Inner Dock	180m AOD
Tall building zone D – Blackwall	130m AOD
Tall building zone E – Leamouth	90m AOD
Tall building zone F	70m AOD

14.28 Part 3 requires all tall building proposals, even when they are located within areas that have been identified as potentially suitable for tall buildings, to demonstrate how they provide significant public benefits to justify their development. Tall buildings and increased densities can be positive things, but they are not inherently so – they have to be accompanied by the public benefits that denser, taller buildings can unlock. The design criteria in this policy set out the circumstances in which tall buildings will be considered acceptable from a design perspective, but to be considered acceptable in the overall planning balance, where the potential negative impacts of taller buildings are considered against the benefits they bring, they must provide a significant proportion of the affordable housing that the borough so urgently needs. To that end, to be considered acceptable, tall building proposals must meet or exceed the 40% affordable housing target for the borough, and provide a suitable mix of unit sizes, including family homes, to meet the identified needs of the borough. In relation to affordable housing, proposals should also meet the tenure mix requiring 85% social rented housing and 15% intermediate housing. Proposals for tall buildings that do not meet this threshold will not be supported. For more details on affordable housing requirements, refer to policy HF2 – affordable housing and housing mix.

14.29 This policy sets out appropriate heights for tall buildings across the borough. However, precise heights will still need to be considered on a site-by-site basis, and each proposal will be assessed on its own merits – in some places within a Tall Building Zone it may be possible to build up to the highest appropriate height, but in other places a lower height may be required for a number of reasons (including, but not limited to,

elements such as microclimate, daylight/sunlight impacts, heritage impacts, and townscape impacts).

14.30 In all cases, the height that is proposed on a particular site should be the one that is demonstrated by a design-led process to be the most appropriate for the context. Part 4 of this policy sets out the criteria that should be considered when determining height on particular sites. Proposals should also consider the specific tall building zone principles in part 6 of the policy.

14.31 Tall buildings should vary in height, so as to not present a 'wall' of development, and to avoid negative impacts on daylight, sunlight, overlooking, and microclimates. Tall buildings within a group should be carefully positioned so that sky views can be experienced from street level and so that tall buildings do not have an overbearing impact on streets and spaces within the area.

14.32 Part 5 sets out a number of design criteria against which tall building proposals will be assessed. This is to ensure that when tall buildings are built, they are well-designed and make a positive contribution to both the directly surrounding context and public realm in which they are located, but also the wider townscape and skyline of the borough. Tall buildings should be designed in a way that promotes the health and well-being of all their residents, as well as those who live in the surrounding area, including through careful consideration of accessibility for people with disabilities and gender-inclusive design. The High Density Living SPD identifies a number of health and well-being concerns with high-density developments (which often, though not always, will include tall buildings) relating to space for children to play

and socialise, sense of community, adequate space for domestic tasks, home working, and keeping pets, a lack of flexibility and storage space in layouts, and problems relating to daylight, overheating, privacy, noise, and wind. However, while poorly-designed tall buildings can exacerbate these problems, well-designed tall buildings can provide high-quality housing that encourages health and well-being. The High Density Living SPD suggests a range of interventions that can ensure tall buildings achieve this.

14.33 The criteria will guide the visual and contextual development of tall buildings in the borough. In order to enable assessment against the criteria, proposals should be accompanied by accurate visual representations within the design and access statement showing the impacts of the proposal in near, middle and distant views, including the public realm and its appearance at street level. The views to be included should be discussed as part of the pre-application process. Major and strategic development proposals should be accompanied by a 3D model of the proposed development in a format compatible with the council's IT systems, ideally provided at pre-application process as well as application stage, to allow officers to assess potential viewpoints.

14.34 Due to their visual prominence, it is important that tall buildings are of exceptional architectural quality, as expressed in part 5(c). New tall buildings should significantly enhance their immediate setting, and be sensitive to the defining characteristics of the local area. Visually prominent plant, building maintenance units (BMU) and/or antennae at the top of a building will not be acceptable and should be appropriately concealed as part of the architectural design.

14.35 Tall buildings should be designed to express elegance, proportionality, and verticality in a form that is consistent from every angle. To that end, generally slab blocks and bulky forms should be avoided.

14.36 The choice of facing materials is important to assist in visually weaving a new building into its established surroundings or, where appropriate, provide a contrast. Design should draw on local character and distinctiveness when selecting materials and help reinforce the identity and sense of place within an area. The choice of materials needs to be carefully tested through 3D modelling and visualisations to fully understand their impact. Consideration should be given as to how design detailing is perceived from close up, and middle and long distance views. Materials should be durable and offer longevity, and should be fully justified in relation to the typical palette of materials and colours used in its location. Bright colours and tones that are visually prominent should generally be avoided on tall buildings, particularly within the setting of sensitive heritage assets or when visible in sensitive views.

14.37 Tall buildings house large numbers of people and can support a range of activities, including the provision of amenity areas (e.g. private, communal and public spaces) and active uses. In the majority of cases, tall buildings are communities in their own right given the number of inhabitants they have. In relation to part 5(i), where they are residential, tall buildings should deliver appropriate quantities of high-quality amenity and play space for tenants and occupants. Communal open spaces and children's play space should typically be at the centre of

the development and be well-overlooked. Spaces should be accessible for those who require level access, and should be oriented to maximise sunlight and daylight. Communal spaces should establish platforms for interactions between users to support a sense of belonging. Ground floors of tall buildings, where possible, should introduce uses which would benefit the wider neighbourhood. Tall buildings should also foster social cohesion and support integration between local communities.

14.38 Further guidance on how to achieve good design for social interaction in high density environments can be found in the Tower Hamlets High Density Living SPD.

14.39 In relation to part 5(j), proposals involving tall buildings will need to demonstrate how any adverse impacts on the microclimate will be mitigated in relation to wind, overshadowing, daylight and sunlight, solar glare, and light pollution. Buildings over 25 metres in height and/ or substantially taller than surrounding buildings must be tested against the following amended Lawson criteria in relation to wind.

Table 5: Amended Lawson criteria for wind testing

Category	Mean and gust equivalent mean (GEM) wind speed (5% exceedance)	Description
Frequent sitting	2.5m/s	Acceptable for frequent outdoor sitting use, e.g. restaurant, café.
Occasional sitting	4m/s	Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies/terraces intended for occasional use, etc.
Standing	6m/s	Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
Walking	8m/s	Acceptable for external pavements, walkways.
Uncomfortable	>8m/s	Not comfortable for regular pedestrian access.

14.40 Strong winds are to be assessed as exceedances of 15m/s, and are to be mitigated to safe levels.

14.41 The testing of the following scenarios will be required as part of the planning application:

- baseline (i.e. the situation at the time of submission);
- the proposed development without mitigation/landscaping;
- the proposed development with surrounding cumulative developments without mitigation/landscaping;
- the proposed development with the inclusion of mitigation/landscaping; and
- the proposed development with surrounding cumulative developments with the inclusion of mitigation/landscaping.

14.42 Specific details on the required mitigation measures must be provided, including where and how these measures will be implemented. It must be ensured that all mitigation measures and landscaping proposed and tested in the wind microclimate assessment are proposed within the relevant planning documents, including the landscaping strategy.

14.43 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.

14.44 In relation to part 5(k), all buildings of 18m or more in height will

be expected to provide at least two staircases as part of improved fire safety measures. This is in line with expected changes to the building regulations.

14.45 In relation to part 5(l), proposals involving buildings 90 metres in height or greater must be referred to the Civil Aviation Authority and London City Airport to ensure they will not be a potential hazard to aviation safety and navigation, in view of the proximity to London City Airport.

14.46 Part 5(m) relates to situations in which the delivery of tall buildings on one site could potentially harm the delivery of a similar level of density on an adjacent site if development on the first site is delivered badly. This can particularly be the case where buildings are proposed right against the boundary line of a plot, which could make it difficult for adjacent plots to achieve Local Plan requirements relating to privacy, overlooking, and daylight and sunlight.

14.47 The criteria set out in part 5 also apply to the redevelopment of existing tall buildings (including those outside the tall building zones). The presence of an existing tall building on the site will not in itself be regarded as justification for replacing it with another tall building – all proposals for tall buildings will need to be justified with reference to this policy and other policies that make up the development plan.

14.48 Part 6 of the policy sets out the requirement to consider the incorporation of public viewing galleries within tall building developments. Such arrangements should be made free to enter and publicly accessible. Such galleries should typically be located at the top

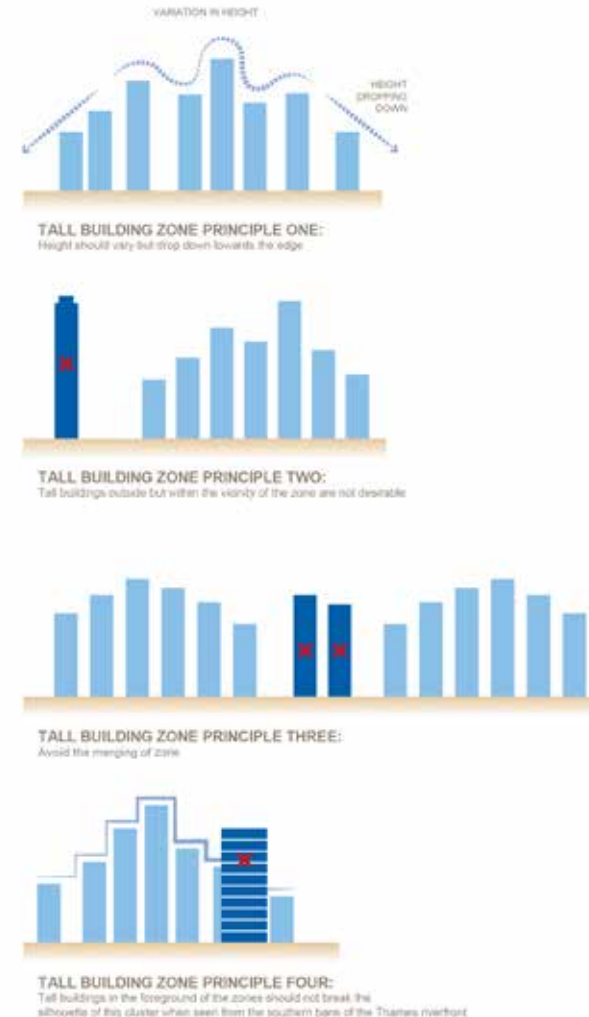
of the building to afford wider views across London. This would support Part D of London Plan Policy D9 and provide greater opportunities to appreciate London's skyline from different parts of the borough.

14.49 Part 7 sets out specific principles for the tall building zones in the borough. Within these zones, tall buildings will be considered acceptable in principle, but it is still necessary to have some principles for how they are delivered, to ensure that clusters of tall buildings work harmoniously together, present a positive image of the borough, and do not have negative impacts in terms of microclimate, daylight/sunlight, heritage, or townscape. These principles will allow the council to assess proposals within the tall building zones and determine whether they are of appropriate height within the context.

14.50 The height of tall buildings within a zone should reflect the role and function of the zone. Zones A to E are considered to be the principal points of height within the borough, and these zones are where the tallest buildings in the borough will be delivered. Within these zones, normally the tallest elements should be located towards the centre of the zone, which should mark a particular feature or location.

14.51 Development will be required to step down towards the edges of the tall building zones. Variations in height will be encouraged to create a more dynamic skyline. Figure 11 demonstrates principles for the tall building zones that should be considered as part of the design-led process for proposals within tall building zones.

Figure 11: General tall building zone principles



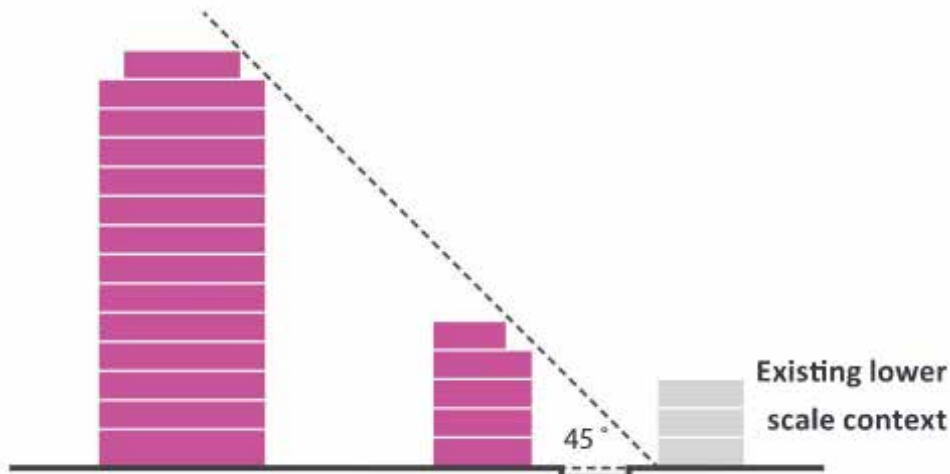
14.52 Zone F represents a much more geographically diffuse and varied area than zones A to E. This zone illustrates the principle that much of the borough is suitable for relatively tall buildings, especially where these deliver public benefits including affordable housing. To this end, the zone contains all the character areas identified in the Characterisation and Growth Study which are not already within Tall Building Zones A to E or within site allocations, and which are not disqualified by means of being located within Conservation Areas, protected viewpoints, or nature or open space designations. However, to ensure the primacy of zones A to E and to ensure that very tall individual buildings are not brought forward on inappropriate sites far away from existing clusters, heights within this zone should be limited to 70m, and the tallest buildings within the zones should form clusters around rail transport stations or be located within town centres, where the higher level of accessibility to public transports, shops, and services can better accommodate higher densities. The threshold of 70m has been selected as this is the definition of a tall building in the City of London, which is adjacent to Tower Hamlets. By limiting heights to this level, we can gradually and sustainably increase the density of Tower Hamlets while respecting the context of heights in the City. Locating taller buildings in these areas can aid legibility, helping people find their way to town centres and transport hubs.

14.53 Site allocations are also considered to be areas suitable for tall buildings, and specific heights and design principles for tall buildings within site allocations are set out in more detail in section 4 of this plan.

14.54 Part 8 highlights the extra consideration that is required where areas that are suitable for tall buildings meet areas that are not suitable. In these areas there are likely to be particular heritage concerns that

may necessitate lower building heights in order to avoid harm to heritage assets. The council has a statutory duty to pay special attention to protecting listed buildings and preserving or enhancing the character of conservation areas, and tall buildings may be harmful to the character or appearance of conservation areas in situations where modest building heights, consistent rooflines, or an open street scene form part of that special character. In some instances, taller buildings may cause harm by disrupting important views, overpowering areas of lower rise character with historic significance, or causing unacceptable harm to the setting of a conservation area or listed building. The cumulative impact of development on open spaces will also need to be considered in some instances, to ensure that open spaces remain attractive and enjoyable for residents and are not permanently in shadow. Heights in these locations may be expected to 'step up' more gradually from the non-tall building areas to reduce harm. As a frame of reference for appropriate heights in locations where tall buildings may be placed in close proximity to areas of lower height, an angular plane of 45 degrees should be measured from surrounding properties in the lower height area to determine appropriate heights above which new development should not extend (though there may be further issues relating to heritage impacts that necessitate lower heights even than this).

Figure 12: Example of 45 degree angular plane taken from existing lower scale context



14.55 The heights of buildings within the area suitable for tall buildings will not be taken as a precedent to justify tall buildings within the area not considered suitable for tall buildings.

London Plan policies:

- D3 Optimising site capacity through the design-led approach
- D9 Tall buildings
- D12 Fire safety

Local Plan policies:

- HF2 Affordable housing and housing mix
- HF9 Housing standards and quality
- BO2 Open spaces and the green grid network
- BO3 Water spaces
- BO6 Play and recreation spaces

Evidence base:

- Views and Landmarks Study, 2024
- Characterisation and Growth Study, 2023
- Historic England Advice Note 4: Tall Buildings, 2022
- Fire Safety LPG – Consultation Draft, 2022
- Tall Buildings SPD Evidence Base Report, 2021
- High Density Living SPD, 2020
- Character and Context SPG, 2014
- Urban Structure and Characterisation Study and Addendum, 2009, 2016
- Conservation Area Character Appraisals and Management Guidelines

Policy PS3 Securing design quality

1. Development is required to meet the highest standards of design, layout and construction which promotes health and well-being and respects and positively responds to the context, townscape, landscape, public realm, and the needs of the community at different spatial scales. To achieve this, development must:

- a. be of an appropriate scale, height, mass, orientation, bulk, layout, and form in its site and context;
- b. integrate positively with existing development in the surrounding area, including having regard to the existing urban grain and established plot division;
- c. provide coherent building lines, roof lines and setbacks, complement streetscape rhythm and associated landscapes (including boundary treatments) and ensure optimal plot coverages to avoid over-development;
- d. ensure that the architectural language – scale, composition and articulation of building form, design of detailing, elements and materials applied on elevations – complements and enhances the immediate and wider surroundings;
- e. use high-quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development;
- f. consider the use of colour to respond contextually to the character of surrounding areas and improve legibility;



- g. ensure that buildings are designed and laid out in such a way as to be adaptable and accessible for potential future uses and users;
- h. ensure that the health and wellbeing of all users, particularly vulnerable people, is considered throughout the design process;
- i. use design and construction techniques to ensure that the development does not result in unacceptably harmful impacts

- arising from overheating, wind, air pollution, light pollution noise pollution, or unacceptable odours whilst optimising energy and waste efficiency;
- j. provide a mix and range of communal and publicly accessible open spaces and water spaces, and enhanced connectivity to existing open and water space;
 - k. maintain privacy for residents within habitable rooms (including residents of existing nearby buildings) and avoid overlooking where possible, or an unacceptable increase in the sense of enclosure;
 - l. ensure new and existing habitable rooms have an acceptable outlook, and maximise dual aspect units;
 - m. ensure new and existing habitable rooms provide an acceptable level of ventilation;
 - n. seek to maximise levels of daylight and sunlight in new residential developments and ensure adequate levels of daylight and sunlight for new residential occupiers in habitable rooms and in amenity spaces within the development;
 - o. not result in an unacceptable material deterioration of the sunlight and daylight conditions in habitable rooms of surrounding development and not resulting in an unacceptable level of overshadowing to surrounding open space and private outdoor space;
 - p. not create unacceptable levels of artificial light, odour, noise, fumes, vibrations, or dust pollution during the life of the development; and
- q. consider implementing suicide prevention safety measures where necessary and where they can be feasibly and appropriately incorporated into the design of the building.
2. Development with a density of 1,100 habitable rooms per hectare or more must demonstrate how it has considered the requirements of the Tower Hamlets High Density Living SPD in the design of the proposal.
 3. The council will require the use of planning conditions or planning obligations to ensure that the design quality of applications is carried through to the final delivery of a development.

Supporting text

14.56 This policy sets out the general design criteria against which all new development will be assessed. The purpose of this policy is to outline the key elements of high-quality design so that new development creates buildings, spaces and places that are sustainable, accessible, attractive, durable, and well-integrated into their surroundings and that are responsive to the character of the area, thus contributing to a better quality of life for residents.

14.57 The experience of the urban environment is collective and cumulative, and even small elements of poor design can significantly detract from how we experience, understand, and value a place. Good design, on the other hand, can contribute positively to the health and well-being of residents and the wider community. Therefore, all development will be expected to meet the highest possible standard of design.

14.58 Policy PS1 requires a design-led approach to new development and Policy PS3 complements this strategic approach to design by detailing some of the specific elements of good design that should be considered. This policy does not exhaust everything that should be considered as part of that design-led process, and in particular a design-led process will also be heavily influenced by engagement and consultation with the community – but the requirements of this policy will help to ensure that the design-led process is successful.

14.59 Parts 1(a) to (j) sets out requirements to ensure that new development is of an appropriate design, layout, and construction to create sustainable and adaptable new communities. The design, siting and layout of new development should be considered in the wider context and be sensitive to the existing character and identity of the

area. This does not require proposals for new development to copy surrounding buildings – imaginative and innovative interpretations of the local context can be the starting point for high-quality architecture and can contribute positively to the character of a neighbourhood, but only where they have been carefully considered, refined, and consulted on to ensure that they respond to the needs of the community.

14.60 New development should be well-integrated with existing development in the surrounding area (part 1(b)). This can be related to the physical characteristics of buildings, such as materials and form, but can just as importantly be related to the social elements of design. It is important that new development does not 'turn its back on' existing communities and create a feeling of exclusivity or separateness. New development should be seen and felt to benefit and contribute to existing communities, rather than to stand apart from them or to feel like an imposition on existing communities.

14.61 With regard to roof lines (part 1(c)), plant should ideally be located below ground rather than on the roof. However, where provided on the roof, it should be fully integrated into the form and design of the roof to avoid compromising the appearance of the building, including the profile and appearance from neighbouring buildings and in long views.

14.62 Ground floors should be designed with a finer level of architectural detailing to ensure their legibility from street level; and on larger scale buildings, architectural detail should be sufficiently pronounced to remain readable features from a distance (part 1(d)).

14.63 In line with the policies in the Clean and Green Future chapter of this Plan, it is important that the design of new development takes account of the need to mitigate and adapt to climate change. This should include the use of materials that are robust and long-lasting and

which also have the potential to be reused in line with circular economy principles (part 1(e)); and consideration of how to use the orientation of buildings and external shading features such as overhangs, recesses, Louvres or brise soleil to control the temperature of indoor spaces and avoid overheating without the use of energy-intensive air conditioning systems.

14.64 Planning applications (including temporary permissions) will need to include technical information regarding materials, detailing, and finishes to demonstrate their longevity, quality and relationship to the local context.

14.65 Buildings and spaces should be designed to be adaptable and flexible from the outset, enabling them to respond to the changing needs and lifestyles of the occupier and allow for a variety of uses over time (part 1(g)).

14.66 The health and wellbeing of all users (part 1(h)), particularly vulnerable people, should be considered throughout the design process, and opportunities to promote health equity through design should be explored. Policy DV3 on healthy communities looks at this requirement in more detail.

14.67 Communal amenity space (part 1(j)) should be shared by all housing tenures – if it is not possible to make all amenity space shared, the majority of it should be. Amenity space should be spread throughout the development to avoid the burden of it falling on one tenure.

14.68 Amenity space should be easily accessible from residential entrances and should be well overlooked. The primary communal amenity space in a development should be located outdoors. Part of

the communal amenity space should promote physical activity such as outdoor gyms or gardening, and part should encourage rest and relaxation.

14.69 Parts 1(k) to (p) set out requirements relating to residential amenity. For the purposes of these parts, a habitable room is defined as a room within a dwelling, the primary use of which is for living, sleeping, or dining. This definition includes living rooms, dining rooms, bedrooms, studies, home offices, and conservatories but excludes halls, corridors, bathrooms, and lavatories. Kitchens which provide space for dining and have windows will be considered habitable rooms and should be included in the assessment of amenity impacts.

14.70 Part 1(k) of the policy seeks to ensure there is sufficient privacy and no unreasonable loss of amenity from overlooking between habitable rooms of adjacent residential properties, or onto schools and other community facilities (e.g. health centres) or private open spaces. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. However, a distance of approximately 18 metres between windows of habitable rooms reduces inter-visibility to a degree acceptable to most people. This figure will be applied as a guideline depending upon the design and layout of the development.

14.71 For the purposes of part 1(l), outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. To achieve acceptable outlooks, single aspect dwellings should be avoided – in line with the London Plan Guidance on Housing Design Standards, homes are expected to be at least dual aspect unless there are exceptional circumstances which make this impractical or undesirable. The definition of a dual aspect unit will be that

used in Appendix 3 of the Housing Design Standards LPG – this means that “the provision of bay windows, stepped frontage, shallow recesses, or projecting facades does not constitute dual aspect”. If dwellings overlook bin stores, then screening and landscaping should be used to limit the impact.

14.72 Part 1(n) seeks to ensure that the design of new development optimises the levels of daylight and sunlight. Part 1(o) seeks to ensure that new developments minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing (including on amenity space and public open space). A sunlight and daylight assessment must accompany all major planning applications and smaller schemes where adverse effects on daylight and sunlight levels are anticipated. It should follow the methodology set out in the most recent version of Building Research Establishment’s Site Layout Planning for Daylight and Sunlight guidance and the British Standard Code of Practice for daylighting, the results of which must be submitted with the planning application. Daylight and sunlight assessments should also include consideration of the potential redevelopment of adjacent sites, so as not to prejudice their redevelopment.

14.73 Part 1(p) seeks to ensure that artificial lighting is well-designed and uses appropriate light levels. For the purpose of this policy, light pollution is defined as the adverse effect of artificial lighting and includes glare, light spillage and sky glow. Odour and fumes from commercial developments can also have an adverse impact on the amenity of surrounding residents. Development proposals should refer to the most up-to-date guidance and best practice on the control of odours and noise from commercial kitchen exhaust systems.

14.74 Part 1(q) encourages consideration of suicide prevention safety measures where this is necessary – for instance, to reduce the risk

of suicide from falling. This could involve the installation of physical barriers, but also the use of creative design to achieve outcomes such as the reduction of fall height. Areas with an identifiable suicide risk could also benefit from the installation of signage promoting support services. Applicants are encouraged to discuss this with the council at the earliest opportunity, to better understand how such measures can be sensitively incorporated into the design of the development.

14.75 Further guidance on a successful design approach can be found in supplementary guidance, in particular the Tower Hamlets High Density Living SPD. Part 2 of the policy specifies that this document must be considered as part of any proposal with a density of 1,100 habitable rooms per hectare or above. However, developments that are high density but below this threshold are also encouraged to consider the provisions of this document as part of the design-led process, as it includes ‘best practice’ guidance that can help to ensure that the proposal is acceptable in design terms.

14.76 It is important to ensure that the quality of design that is granted permission is carried through to the final delivery of a development, both to ensure that high-quality design comes forward in the borough and also to provide trust in the process among local communities, who can feel confident that what is permitted is what will be developed. Part 3 of the policy sets out that the council may, where it is considered appropriate and necessary, require the use of planning conditions or planning obligations to ensure that design quality is carried through into the detailed design and construction of the development in accordance with London Plan Policy D4. This may include architect retention clauses or requirements for design certification. Providing the maximum possible level of design detail at application stage can reduce the need for later design amendments that could negatively affect development quality.

14.77 Further considerations relating to design quality can be found in the council's document Securing Design Quality – A Practice Note.

London Plan policies:

- D3 Optimising site capacity through the design-led approach
- D5 Inclusive design
- D6 Housing quality and standards

Local Plan policies:

- DV3 Healthy communities
- CG2 Low energy buildings
- CG4 Embodied carbon, retrofit and the circular economy
- CG5 Overheating
- CG8 Water efficient design
- CG9 Air quality
- CG10 Noise and vibration
- HF9 Housing standards and quality
- BO2 Open spaces and the green grid network
- BO3 Water spaces
- BO6 Play and recreation spaces

Evidence base:

- Characterisation and Growth Study, 2023
- Gender Inclusive Design: Creating a safe, inclusive and restorative borough, 2023
- Securing Design Quality – A Practice Note, 2023
- London Plan Guidance – Housing Design Standards, 2023
- Site Layout Planning for Daylight and Sunlight, 2022
- National Design Guide, 2021
- High Density Living SPD, 2020
- Planning and Social Cohesion Evidence Base, 2020
- Preventing Suicides in Public Places, 2015
- Character and Context SPG, 2014
- Conservation Area Character Appraisals and Management Guidelines

Policy PS4 Attractive streets, spaces, and public realm

1. Development is required to contribute to improving and enhancing connectivity, permeability, and legibility across the borough, ensuring a well-connected, joined-up, safe and easily accessible street network and wider network of public spaces through:
 - a. improving connectivity to public transport hubs, town centres, open spaces, water spaces, social and community facilities and surrounding areas;
 - b. maintaining existing public routes or appropriately re-providing access routes during the construction phases of new development;
 - c. incorporating the principles of 'secured by design', where these can improve safety and perception of safety for pedestrians and other users without significantly conflicting with other elements of good design including those set out in this policy; and
 - d. incorporating an inclusive 'healthy streets' approach to the design of new developments and improvements to adjacent streets where appropriate, particularly streets that are part of the green grid.
2. Development is expected to optimise the coverage and effectiveness of active frontages in order to create routes throughout the borough that feel safe for all users through:
 - a. prioritising active frontages along main roads and primary routes through sites;
 - b. designing commercial and community uses so that the most

- c. active uses are facing the street;
 - c. not including frosted or otherwise obscured glazing along routes that are providing active frontages;
 - d. designing ground floor amenity uses in residential buildings so that more active uses are visible from the street or from primary routes through the site;
 - e. locating entrances in visible, safe and accessible locations;
 - f. ensuring that ground floor units can be accessed directly from the street;
 - g. creating opportunities for natural and passive surveillance, particularly at ground level;
 - h. locating inactive uses away from main roads and primary routes through sites; and
 - i. designing inactive frontages to be more attractive and, where appropriate, visually permeable.
3. Development is required to positively contribute to the public realm through:
 - a. providing clear definitions and enclosure through building frontage and massing, and connection and continuity of pedestrian desire lines and street activities, at a human scale;
 - b. providing a range of public spaces that can function as places for social gatherings and other recreational uses;
 - c. reducing visual clutter and obstacles in the public realm of the scheme and the adjacent area;
 - d. ensuring balconies do not over-hang on the public highway or onto neighbouring properties, civic spaces and public buildings,

- such as schools;
 - e. avoiding the creation of gated communities which do not promote socially inclusive and cohesive neighbourhoods or connectivity between places;
 - f. using high-quality, robust, low-maintenance, and trip-proof materials for footways, parking spaces and local streets to create attractive, accessible, comfortable and useable public spaces;
 - g. integrating high-quality public art into the public realm, especially at gateway locations or other appropriate landmarks, and retaining existing good quality art in the locality of new development, where possible;
 - h. ensuring that all new streets contain native or drought-resistant trees or otherwise maximise planting and soft landscaping to provide visual and environmental relief from hard landscaping, buildings and traffic supported by a planting management and maintenance plan;
 - i. designing out concealment points and leftover spaces;
 - j. creating clear sightlines and visual permeability, and improving legibility of the surrounding area at all times of the day and night; and
 - k. providing clearly lit, well-signed, and direct routes for night-time use.
4. The council will support proposals for suicide prevention safety measures to be added to bridges over water, roads, or rail, where these measures do not impede access to the transport or active travel network and are compatible with the conservation of heritage assets. The council



will also support proposals for suicide prevention measures along waterfronts where these do not impede access or reduce the ability to use water spaces and adjacent waterfronts for leisure and recreational purposes.

5. Spaces underneath and within 5.5m from the edge of raised DLR viaducts should remain free from permanent structures and should be publicly accessible. Proposals to activate these spaces and promote healthy lifestyles, active travel, community activities, emissions reduction, and economic activity within the surrounding area will be supported.

Supporting text

14.78 As Tower Hamlets has some of the highest population densities in London, the quality of streets and spaces is important to maintain and create a high quality of life. This policy aims to deliver an attractive, legible, accessible, and well-designed network of streets and spaces which promote social interaction and inclusion which people of all ages and abilities can value and enjoy, and where they feel safe and comfortable. The public realm in the borough varies considerably, from the high-quality treatments around Canary Wharf (e.g. natural stone paving and tree planting) and conservation areas, through to the isolated, post-war streetscapes beyond Canary Wharf and Aldgate, as well as the severance arising from major arterial routes, such as Aspen Way and The Highway, around Bow, Poplar, Limehouse and the Tower of London. New development should always aim to provide a public realm which is an improvement on what was there before.

14.79 Part 1 encourages better connectivity and permeability around sites, encouraging people to easily and safely get around the borough – where possible, using active travel methods such as walking or cycling.

14.80 Connectivity refers to the number of connections and their integration, layout and relationship to one another and the impact this has when moving from one point to another. Permeability refers to the variety of pleasant, convenient, accessible, and safe routes through an area and the capacity of those routes to carry the movement of people, whilst avoiding visual clutter in the streetscape and barriers to pedestrian/cycle movement as much as possible. Legibility is the degree to which a place can be easily understood and moved around in.

14.81 In order to improve accessibility and increase movement, new development will also be required to follow a street hierarchy that

puts pedestrians and cyclists first and promotes streets as links for movement and as public places in their own right to ensure a strategic, accessible and safe street network across the borough. Development proposals should provide a clear understanding of the street hierarchy in the surrounding area, and also how new streets created by the development will be incorporated into the hierarchy. The hierarchy consists of:

- Main streets – focusing on movement, and prioritising the safe and convenient flow of buses, cyclists and pedestrians;
- Secondary streets – balancing movement of vehicles, cyclists and pedestrians with attractive and convenient places where people gather and dwell; and
- Local streets – focusing on place, and protecting and enhancing the character and social gathering function that streets provide, alongside their function of providing safe and convenient access to individual properties.

14.82 Part 1(c) seeks to embed the principles of 'secured by design' into the design and layout of new development. Secured by design is a police-led initiative which focuses on how the design of the public realm can create places that are safe or unsafe, or perceived as such by those who use them. Developers should refer to the relevant guidance in relation to counter-terrorist and crime prevention security and engage fully in the pre-application process in order to ensure that measures to mitigate risks are incorporated into developments, where appropriate.

14.83 Where there is a need to ensure the safety of streets and public spaces, particularly crowded places, the correct level of protection should be provided without compromising the ability to create aesthetic and functional public spaces. Proposals should not impose undue restrictions on other occupiers in the area. Proposals should focus on

creating places that feel safe while accommodating a range of uses, rather than through reducing activity by removing features such as seating.

14.84 Part 1(d) encourages development to apply the GLA's 'healthy streets' approach to the design of new public realm spaces. This approach aims to improve the character of London streets and the experience of those who use them, including those with additional accessibility needs. The approach is based on monitoring and improving ten indicators of what life on a healthy street should look like:

- Clean air
- Pedestrians from all walks of life
- Easy to cross
- Shade and shelter
- Places to stop and rest
- Not too noisy
- People choose walking, cycling and public transport
- People feel safe
- Things to see and do
- People feel relaxed

14.85 Further guidance on the implementation of the healthy streets approach can be found in the GLA guidance Healthy Streets for London (2017) and Guide to the Healthy Streets Indicators (2017).

14.86 Part 2 requires the creation of active frontages as part of new developments. Active frontages refers to areas at the ground level of a building where there is a feeling of activity, and the potential for activity. This can help to encourage a feeling of safety and sociability in the public realm by ensuring that users of the space – whether just

passing by or dwelling in the space for some time – feel that they are not isolated and vulnerable.

14.87 Development proposals should demonstrate a clear understanding of where active frontages need to be prioritised, gained from a design-led approach to the proposal which includes consultation and engagement with a wide range of potential users of the space. Development should strike a careful balance between the need for privacy of residents and occupiers of a building, and the positioning of more sociable and active uses in such a way that they create active frontages and signpost legible and safe routes through sites.

14.88 Development proposals should avoid situations where the street level is forced to accommodate too many service functions (for example, bike storage, plant space, waste storage, etc.), leading to excessive amounts of inactive frontage. These service functions are important, but in many instances may be better accommodated as part of a basement, rather than creating large areas of street level 'dead space'.

14.89 Part 3 provides more general principles for ensuring an attractive and well-designed public realm. Public realm should be comfortable and functional, well-integrated with surrounding areas (including London's green grid network), and support the delivery of successful and vibrant places.

14.90 Development should create streets and spaces with a degree of enclosure by assisting in defining the edges of the public realm, through continuous building lines and active frontages. Development should avoid creating concealment points and external lighting should be an integral component in ensuring safety and security within the public realm in line with the principles of secured by design. To reduce street

clutter, street lighting should be discreetly integrated into the design of buildings, where this is possible and does not adversely affect levels of light pollution for residents.

14.91 Balconies overhanging the public footway/ highway or onto neighbouring properties and buildings and spaces of civic importance have the potential to harm the safety and amenity of local occupiers, residents, and the public highway as well as cause overlooking, especially at the ground floor level.

14.92 Gated communities do not contribute to a well-connected, accessible, and permeable public realm, or socially inclusive and cohesive neighbourhoods. Such proposals will be resisted, in line with the London Plan, and alternative means of providing safety and perceived safety should be explored through the implementation of good urban design principles.

14.93 Proposals should also use complementary elements, such as materials, finishes, furniture, landscaping, signage, lighting, and public art, to ensure that development and the public realm is at a human scale and puts people at the heart of the design process, so that the importance of how people view and feel about their environment is recognised. This should include ensuring design features meet the health and well-being needs of people (e.g., the provision of shade, shelter, and places to rest, including seating with supportive backs and arm rests). With regard to public art, efforts should be made to ensure that any such installations are as inclusive as possible and have been developed with the engagement of the community.

14.94 The inclusion of high-quality public art into the public realm is encouraged. Proposals for public art should be durable and robust,

positioned so as not to create street clutter and obstruct the movement of pedestrians or cyclists, and make a positive contribution to the character of the local area, including by recognising local history and cultural heritage. Developers should engage with the council at an early stage in the process to best determine what will be appropriate and how public art can be successfully integrated within a site. The council will seek to secure appropriate maintenance of public art through conditions or other legal agreements.

14.95 The NPPF encourages new streets to be tree-lined, and this policy asks for new streets to incorporate trees where possible and to also include other forms of urban greening. This is an important component of creating healthy urban environments and can also help to ensure that developments meet requirements elsewhere in this Local Plan for biodiversity improvements and urban greening. Planting strategies should be discussed with biodiversity and tree officers from the council at an early stage to ensure that the selected species are appropriate and can be adequately maintained. Non-native trees may not be appropriate close to sensitive habitats due to the potential for negative ecological impacts.

14.96 Part 4 of the policy sets out the council's support for necessary safety measures on bridges and at waterfronts within the borough, where these have been identified as posing a potential suicide risk. Such measures should be proportionate to the risk and must be in conformity with other policies in this plan, including those relating to access to the transport and active travel networks, access to water spaces, and to heritage conservation. Where such proposals are to be put forward, discussions should be opened with planning officers at the earliest opportunity, to ensure that measures can be implemented appropriately.

14.97 Part 5 promotes the activation of spaces under the DLR viaducts, to include them into the network of public realm and ensure connectivity between areas across the line. These spaces are currently underused and could present opportunities for a number of community-focused uses.

London Plan polices:

- GG3 Creating a healthy city
- D5 Inclusive design
- D8 Public realm
- G5 Urban greening
- T2 Healthy Streets

Local Plan policies:

- TC2 Protecting the diversity, vitality and viability of our town centres
- TC7 Evening and night-time economy
- BO2 Open spaces and the green grid network
- BO3 Water spaces
- BO4 Biodiversity and access to nature
- BO6 Play and recreation spaces
- RW3 Waste collection facilities in new development
- MC2 Active travel and healthy streets

Evidence base:

- Characterisation and Growth Study, 2023
- Gender Inclusive Design: Creating a safe, inclusive and restorative borough, 2023
- Spatial Planning and Health Needs Assessment, 2023
- Homes (Secured by Design), 2023
- National Design Guide, 2021
- High Density Living SPD, 2020
- Planning and Social Cohesion Evidence Base, 2020
- Tree Management Plan 2020-2025
- Making London Child-Friendly: Designing Places and Streets for Children and Young People, 2020
- Healthy Streets for London, 2017
- Guide to the Healthy Streets Indicators, 2017
- Preventing Suicides in Public Places, 2015
- Character and Context SPG, 2014
- Conservation Area Character Appraisals and Management Guidelines

Policy PS5 Creating inclusive places

1. Development proposals should demonstrate how gender inclusivity has been incorporated into the design, and that design is informed and shaped by the diverse communities of the borough, through:
 - a. the design of routes through and around the site, and how they connect to existing routes in the surrounding area – these should be legible, well-signed, appropriately lit, accessible, and ensure clear sight lines;
 - b. the design of communal and publicly accessible spaces in ways that encourage intergenerational sociability throughout the day and night and are not likely to encourage dominance of the space by a single group of people;
 - c. the provision of appropriate facilities for residents and the wider community, to ensure that the needs of the community are met;
 - d. the design of buildings, ensuring that they provide active and passive surveillance onto the street to increase the feeling of safety, and do not present avoidable obstacles to movement or accessibility;
 - e. ensuring pedestrian routes are surfaced with high-quality, easily maintainable material and are wide enough to give space to pass by, and to use a wheelchair or pushchair while also walking with one or more additional children;
 - f. safe access to less active parts of the development, such as bin and bike storage areas; and

- g. inclusion of public art and street and building names that recognise people from diverse backgrounds who have contributed to shaping the borough, including women, disabled people, the LGBTQ+ community, and ethnic minorities.
2. Development proposals should demonstrate that reasonable efforts have been made to make the design process inclusive. This should include:
 - a. involving diverse sections of the community in co-design of development proposals from an early stage, including women and girls, people with disabilities, the LGBTQ+ community, and ethnic minorities; and
 - b. demonstrating that local knowledge, captured through early engagement and co-design, has informed and shaped design proposals.

Supporting text

14.98 This policy encourages all new development to consider inclusive design as part of the development process. This policy is based upon a gender-inclusive design evidence base document that has been prepared by the council, and a disability-focused local plan consultation workshop held with the disabled people's organization Real at Regulation 18 consultation stage. Evidence from the UN, the World Bank, and the GLA shows that if the needs of women and girls are considered and shape the development of the urban environment, outcomes will be more welcoming and work better for all. Therefore, designing with women and girls creates better places. Our own research with women and girls, disability and LGBTQ+ groups shows that meeting the needs of women and girls also helps to meet the needs of minority and marginalised groups.

14.99 Women make up 50% of the population, but historically the majority of places have been designed by men and for men. This can be seen in wider structural patterns of the urban environment, such as the focus in transport policy on moving people from the suburbs to the city centre, accommodating a standard 'commuter' pattern of travel that has historically been more likely to apply to men; while neglecting the more disparate patterns that are often attributed to women in their role as caregivers – for example, needing to travel between home and school, from school to the shops, back to the home, back to the school, then to swimming lessons, and so on. But it can also be seen in the smaller details of design – uneven pavements and unnecessary stairs, which make life harder for those with pushchairs (and for others, such as those in wheelchairs or with reduced mobility in other ways). In other instances, the design of cities can create spaces that feel unsafe and unwelcoming

– places that feel deserted and isolated, or places where women and gender-diverse people may feel like they are 'out of place'.

14.100 Statistics may indicate that that crime in these spaces is low, although this may be impacted by low rates of reporting crime. However, if people feel unsafe, they are unlikely to use the spaces, or will feel uneasy if they do. This can create a cycle of spaces becoming under-utilised, which creates opportunities for people to commit antisocial behaviour or illegal acts such as drug dealing.

14.101 A focus on gender inclusivity in design is not intended to exclude or polarise communities. Instead, by 'modelling' improvements that benefit women, girls, and gender-diverse people, we are able to rebalance urban design to the benefit of all people by improving the experience of those who do not adhere to the 'norms' of a cis-gendered white male population (whom much of the city was initially designed by and for). The policy does not indicate that men pose an inherent risk or are a 'problem' within the urban environment that must be 'solved', but rather to address how urban environments have often been designed in ways that disadvantage women, girls, and gender-diverse people. By remodelling the borough through the lens of gender inclusion we are able to ensure that everyone can use, enjoy and experience an equal city and that over time our built environment will be more representative and welcoming to all. And when women and girls feel welcome, it has a positive impact on the social and economic prosperity of a place – so proactively designing welcoming spaces that encourage women and girls to feel welcome also develops regenerated spaces that benefit the whole community.

14.102 To understand this topic, an evidence base document on gender inclusivity in the urban environment has been prepared. This

has included on-street interviews with women and girls across the borough, workshops with community organisations, online 'walks' around the borough to discuss safety concerns, and detailed surveys and questionnaires. Over 400 women and girls participated in this research and by listening to their lived experience of the borough we have developed a series of recommendations that suggest new approaches to development and the way development is planned and delivered, from a high level approach to specific fine grain recommendations to improve streets, public spaces and building exteriors (such as entrance ways and exits).

14.103 In addition to this work on gender-inclusivity, as part of the Regulation 18 consultation on the local plan, a disability-focused workshop was co-produced with the disabled people's organization Real. This attracted over 50 participants, who worked together to discuss clusters of questions relating to the local plan themes, and led to a greater understanding of the needs of disabled people within the urban environment. The conclusions from this workshop, along with consultation responses from other groups and individuals representing marginalized communities, has led to the refocusing of this policy towards a more generally inclusive design approach, and an intersectional approach that recognises that people may belong to a combination of marginalised communities based on gender, sexuality, ethnicity, disability and neurodivergence, and age. This further emphasizes that improvements to the public realm, building design, and community spaces that will benefit women and girls will also benefit the majority of people – including other marginalized communities such as disabled people, the LGBTQ+ community, and ethnic minorities, but also benefitting those who do not fall into any of these categories.

14.104 Alongside this specific policy, which sets out our understanding of some of the elements of inclusive design, we thread inclusivity

throughout the policies in the plan to help embed greater inclusivity in all development proposals.

14.105 Part 1(a) concerns routes, wayfinding, and connectivity. In line with policy PS4, sites should be connected, permeable, and legible – there should be multiple ways to get to destinations and development should be designed, laid out, and incorporate wayfinding in such a way that it is clear to a passerby which are the main routes through the sites, and which are more likely to be of interest only to residents. Consideration should be given to how routes may feel different in the daytime and the nighttime, and to how wayfinding measures clearly identify better lit and more populated routes at nighttime. Regular and visible naming of different areas within the development can also make it easier for people who need to call for help to describe where they are, and can help to make a place feel like a part of the public realm rather than a private space aimed only at residents.

14.106 Parts 1(b) and 1(c) regard community facilities, including new open spaces and other social facilities, including large elements of social infrastructure such as new schools or health centres that may be provided on particularly large development. Tower Hamlets has a shortage of high-quality open space, and as the density of the borough increases, the amount of open space per resident decreases further. Our evidence base on gender-inclusive design indicates that women often feel excluded from some open spaces in the borough, where these are felt to provide few facilities or to be poorly designed in terms of visibility and feeling welcome; and our disability-focused workshop also highlighted the importance of green spaces and a need for improved facilities within them. Women with children are particularly in need of accessible, welcoming open spaces with high-quality play facilities for children, and these spaces can also provide a means of socialising with other parents. Given the lack of access to private open spaces such as

gardens in Tower Hamlets, and that green and open spaces have been demonstrated to have significant health and environmental benefits, it is particularly important that developments aim to maximise the amount of high-quality open space they provide, that this space be as green as possible, and that it be as inclusive as possible, with good places to sit, complex planting, trees to provide shade, somewhere to have a picnic, somewhere to play, and somewhere teenage boys can meet away from the main path. The design and location of new open spaces should therefore be considered as carefully as the design of buildings or streets and should not be relegated to an afterthought.

14.107 Open spaces should be designed in collaboration with the community, and should include elements that promote intergenerational sociability (our gender-inclusive design evidence base has found that spaces that are occupied by a more diverse range of people, including people of different ages, feel safer and more welcoming), including benches and other forms of seating, areas of planting that create shade, and elements that can be used by children to play. Improved seating in parks was highlighted in our disability-focused workshop, and is helpful for older people as well as providing spaces for parents and others to socialise. Parks and green spaces need social infrastructure to feel safe and welcoming, including wardens, resident groups and opportunities to get involved in gardening and growing food, which can create opportunities for passive surveillance. Opportunities to play are important for all children and guidance on making space for teenage girls is suggested in the gender inclusive design guidance. In order to ensure that play space is well-used, there should be meaningful engagement with children to understand how they play in their area, and this should inform the play strategy rather than merely responding to a pre-prepared strategy. The different ways teenage girls and teenage

boys take up space should also be considered with consideration that both groups need access to outdoor space and both have a right to open space for health and wellbeing.

14.108 Beyond open space, other necessary facilities could include wheelchair-accessible public toilets with baby-changing facilities, water fountains, community hubs, youth provision, and generous, well-designed open spaces. There should be facilities near to play areas for mothers and caregivers to be able to meet and socialise outdoors, and facilities for young children, for girls and young women, as well as boys and young men.

14.109 In designing buildings, active frontages are encouraged in part 1(d) and through policy PS4, as they can provide feelings of safety and sociability through encouraging activity at different times of the day and night. This can assist in making women and other vulnerable users of streets feel safe and able to use streets throughout the day and into the evening and nighttime to create busy, intergenerational, connected places. Building entrances (including subordinate entrances such as back or side doors) should be well-lit and easily visible, avoiding narrow or concealed entranceways.

14.110 In line with the street hierarchy discussed under Policy PS4, the needs of pedestrians and those using the pavement should be given the highest priority. In many instances, existing pavements are narrow and filled with physical clutter (such as fixed street furniture or parked cars), or consist of uneven or easily damaged surface material that can make movement difficult for those with pushchairs or those in wheelchairs. Part 1(e) requires that pedestrian routes should be wide enough to accommodate the needs of all those who use them.

14.111 While active frontages are encouraged, there will always necessarily be some inactive spaces within a development, and these are considered in part 1(f). Some of these inactive spaces may be useful facilities, such as waste or bike storage, and consideration should therefore be given to how safe and well-lit routes can be provided to allow access to and from these spaces, while also ensuring that items like bins do not block walkways, entrances, or sightlines.

14.112 Part 1(g) should be read in conjunction with the general public art requirements in policy PS3. Research into public art in the UK has shown a severe lack of diversity, with only 2% of named statues representing ethnic minority people, and most of the statues of women that exist being fictional or allegorical representations or royal women. Statues of disabled people or members of the LGBTQ+ community are similarly rare.

14.113 The development of new public art provides an opportunity to somewhat redress this balance, as does the naming of new streets and buildings, by recognising the contributions that marginalised communities have made to the development of the east end of London and the history of our communities through direct representations or by commissioning work by women, ethnic minorities, members of the LGBTQ+ community, or disabled people to explore those stories.

14.114 In all circumstances, designing for inclusiveness means designing with the community, and ensuring the community feel that they have been able to co-design development, rather than having development imposed upon them. The gender-inclusive design evidence base shows that when women and girls are closely consulted, their lived experiences are listened to, and their needs inform design outcomes, this helps to create places with high social and economic prosperity and to build stronger social networks and climate resilience - that is, it

helps to create better places for all. Part 2 requires that constructive engagement and co-production with the community should begin at the earliest possible stage and the community should have an input into what is provided on a site rather than simply being asked to respond to pre-prepared proposals. The final design of a site must be grounded in an understanding of the community, and this means that particular consideration should be given to hearing the voices of women, girls, disabled people, the LGBTQ+ community, and ethnic minorities in the design of proposals, to ensure their views are considered.

14.115 Design and Access Statements or Consultation Statements should demonstrate that efforts have been made to consult widely from the beginning of the design process, and that specific efforts have been made to include diverse communities and marginalised communities in this consultation process. Engagement with these communities should aim to be accessible and participatory, and not simply provide pre-prepared options for comment. There should be a clear understanding of how different groups may interpret and use space differently, and a demonstration of how community responses have been considered and incorporated into the final proposed design of development, as well as into proposals for the wider public realm access routes and connections. Where an Environmental Impact Assessment is required, the data used should be disaggregated by gender and other protected characteristics where possible, to inform a greater understanding of how different groups will be affected by the proposals. The council may look to produce further guidance to set out a framework for inclusive engagement.

14.116 To fully implement inclusivity in the design process, applicants could go further than simply consulting the community. Gender parity in the project teams working on the proposal can help to encourage a greater consideration of women and girls throughout the process,

and the inclusion of workers from other marginalised communities can further help to inform an inclusive approach to design. This could include taking on people from the local area as graduates, apprentices, or for work experience, to encourage a longer-term approach to inclusiveness and diversity across the built environment industries, and consideration of social value throughout the development process.

14.117 This policy should be read in conjunction with policy DV3 on healthy communities, which provides further details around what is required of an applicant to ensure the needs of vulnerable groups have been understood and secured through the planning process. The early initiation of a Health Impact Assessment and community engagement will support the applicant in achieving inclusive design outcomes.

London Plan polices:

- D5 Inclusive design
- D8 Public realm
- S4 Play and informal recreation
- S6 Public toilets

Local Plan policies:

- DV3 Healthy communities
- HF9 Housing standards and quality
- TC2 Protecting the diversity, vitality and viability of our town centres
- TC7 Evening and night-time economy
- Cl1 Supporting community facilities
- Cl2 Existing community facilities
- Cl3 New and enhanced community facilities
- Cl5 Arts and culture facilities
- BO2 Open spaces and the green grid network

- BO3 Water spaces
- BO4 Biodiversity and access to nature
- BO6 Play and recreation spaces
- RW3 Waste collection facilities in new development
- MC2 Active travel and healthy streets

Evidence base:

- Gender Inclusive Design: Creating a safe, inclusive and restorative borough, 2023
- Spatial Planning and Health Needs Assessment, 2023
- Safety in Public Space: Women, Girls and Gender Diverse People, 2022
- High Density Living SPD, 2020
- Planning and Social Cohesion Evidence Base, 2020
- Making London Child-Friendly: Designing Places and Streets for Children and Young People, 2020

Policy PS6 Heritage and the historic environment

1. Proposals must conserve or, where appropriate, enhance the borough's designated heritage assets in a manner appropriate to their significance.
2. Proposals affecting the significance of a heritage asset must:
 - a. provide a clear understanding of the asset's significance;
 - b. provide sufficient information to demonstrate how the proposal would contribute to the asset's conservation;
 - c. justify any harm to the significance of the heritage asset, having regard to the public benefits of the proposal when considering designated heritage assets;
 - d. demonstrate that all reasonable efforts have been made to sustain the existing use, find alternative uses that would avoid harm, or minimise and mitigate the extent of the harm to the asset;
 - e. demonstrate that the works proposed are the minimum required to secure the long-term use of the asset; and
 - f. demonstrate that efforts have been taken to retain, repair, or reinstate historic features where appropriate.
3. Substantial harm to or the total loss of significance of a designated heritage asset will only be supported where it is necessary to achieve substantial public benefits that outweigh that harm or loss, or the following criteria can be satisfied:

- a. the nature of the heritage asset prevents all reasonable uses of the site;
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - c. conservation by grant-funding or some form of not-for-profit, charitable or public ownership is demonstrably not possible; and
 - d. the harm or loss is outweighed by the benefit of bringing the site back into use.
4. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.
5. Proposals should conserve or, where appropriate, enhance the borough's non-designated heritage assets. Where there will be direct or indirect harm to the significance of a non-designated heritage asset a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset.
6. Proposals to alter or extend a heritage asset or proposals that would affect the setting of a heritage asset will only be permitted where:
 - a. they safeguard the significance of the heritage asset, including its setting, character, fabric or identity;
 - b. they are appropriate in terms of design, height, scale, form, detailing and materials in their local context;
 - c. they enhance or better reveal the significance of assets or their settings;

- d. the building retains its character and can provide housing or other appropriate uses without damaging its historic and cultural significance to the borough;
 - e. extensions to listed buildings, or new developments within the curtilage of listed buildings, remain subservient to the host building in terms of height, massing, and scale; and
 - f. where proposals affect the setting of a heritage asset, they should clearly demonstrate an understanding of the setting and how that setting contributes to the significance of the heritage asset concerned.
7. In the case of a change of use from a use for which a heritage asset was originally designed, it must be clearly demonstrated that any harm to the significance of the heritage asset caused by the new use, or by any changes to the building fabric required to implement the new use, is justified when weighed against the public benefits of the proposal, including the benefit of securing the optimum viable use.
8. Proposals for development within a conservation area (as shown on the policies map) or its setting must:
- a. preserve or enhance those elements (including unlisted buildings) which make a positive contribution to the special character or appearance of the conservation area;
 - b. make a positive contribution to local character and the distinctiveness of the conservation area; and
 - c. explore opportunities for new development to enhance or better reveal the significance of the conservation area.
9. Proposals for development that would affect scheduled monuments (as shown on the policies map) or other archaeological sites of equivalent importance must:
- a. justify any harm to the significance of the asset having regard to the public benefits of the proposal;
 - b. demonstrate that all reasonable efforts have been made to mitigate the extent of any harm to the significance of the asset; and
 - c. demonstrate that the works proposed have the minimum impact upon the asset while ensuring that its significance is maintained.
10. Proposals that lie within Archaeological Priority Areas (as shown on the policies map) or other areas that have the potential to contain archaeological heritage assets must:
- a. include an archaeological evaluation report to assess the archaeological potential of the affected area; where necessary, a field evaluation may also be required;
 - b. conserve nationally important remains in situ, subject to consultation with Historic England;
 - c. where other archaeological heritage assets are identified, provide sufficient information to demonstrate how the proposal would contribute to the asset's conservation; and
 - d. where harm can be fully justified, make provision for archaeological excavation and/or recording as appropriate, followed by analysis and publication of the results.
11. Proposals for development that would affect historic parks, gardens and spaces (as shown on the policies map) must:

- a. include a heritage impact assessment setting out the likely impact which it would have upon its significance and the means by which any harm might be mitigated;
- b. conserve those features which form an integral part of the special character or appearance of the park, garden or square; and
- c. ensure they do not detract from the enjoyment, layout, design, character, appearance or setting, key views into and out of the space, or prejudice its future restoration.

12. Proposals that would affect heritage assets listed on the Historic England Heritage at Risk Register will be supported where:

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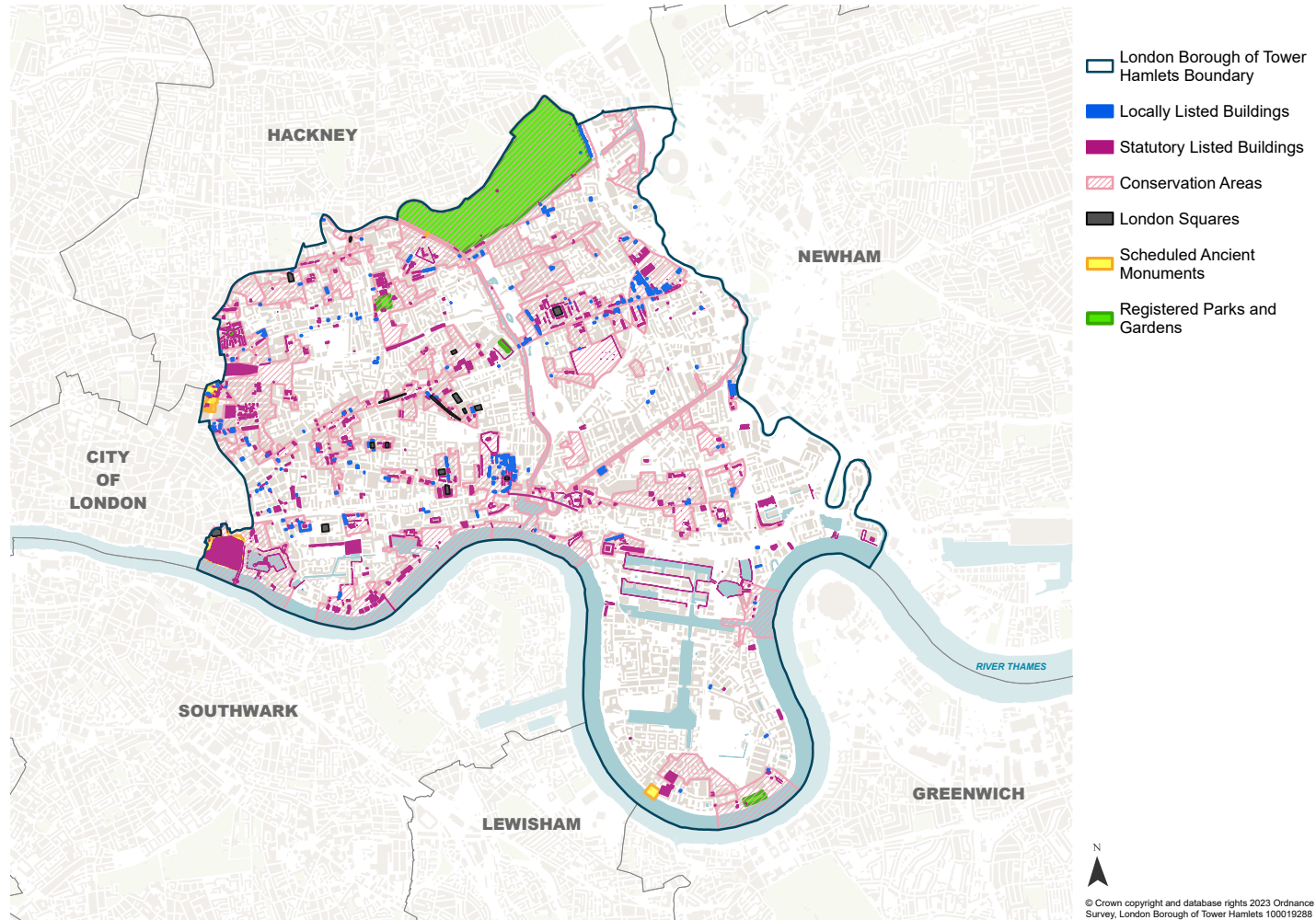
- a. they conserve or enhance the heritage asset in a manner appropriate to its significance;
- b. they provide a viable, long-term use for the heritage asset; and
- c. sensitive repair and restoration is proposed to elements of the heritage asset that have fallen into disrepair.

13. Where development proposals affect historic street surfaces or street furniture, these should be conserved and, where appropriate, restored as part of the public realm proposals on the site. Where development will require the temporary removal of historic street surfaces or street furniture, these should be reinstated in the same or better condition than before the development took place. Proposals for the loss of historic street surfaces or street furniture will not be supported, unless it can be demonstrated that the public benefits of the proposal outweigh the loss of the historic surfaces or street furniture, and no viable development proposal can be found that would allow for the retention of these features.



14. Retrofitting of heritage assets to achieve greater levels of energy efficiency and reductions in carbon emissions will be supported where it is proposed in a manner that conserves or enhances the significance of the heritage asset.

Figure 13: Map of heritage assets in the borough



Supporting text

14.118 This policy aims to protect the borough's heritage and character in line with the council's statutory duties, and sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic environment (including individual assets and their settings) to ensure that its distinctive character is maintained.

14.119 The heritage of Tower Hamlets consists of an enormous variety and diversity of assets, including historic buildings, structures, parks and open spaces, views, archaeology, and heritage collections. These heritage assets are widely valued, cared for, and celebrated by Tower Hamlets residents, for whom they form a source of pride in the borough. They are also recognised more widely, and the borough is visited from across London, the country, and the world by those seeking to understand and experience the histories and heritage of Tower Hamlets and the wider East End of London.

14.120 Our heritage assets are exceptionally important – they are our most recognisable landmarks and most cherished places, and they contribute to reinforcing the unique character and distinctiveness of the borough (including its 24 places) as well as London as a whole through their individual and group value. Some of the key elements of the borough's heritage include:

- military and naval buildings (e.g. Tower of London);
- museums, art galleries, music halls and breweries (e.g. Young V&A and Wilton's Music Hall);
- squares, cemeteries and parks and gardens (e.g. Tower Hamlets Cemetery Park);



- indoor and outdoor markets (e.g. Spitalfields);
- industrial heritage and archaeology (e.g. the Docklands);
- residential streets and buildings of Georgian and Victorian origin (e.g. Fournier Street and around the Victoria Park Conservation Area);
- innovative post-war housing (e.g. Keeling House and Balfron Tower); and
- religious and education institutions (e.g. Christ Church Spitalfields and Toynbee Hall).

14.121 The importance of protecting heritage is reflected in the national and regional policy that informs this Local Plan. The council is required to have a positive strategy for understanding and conserving important aspects of our heritage, and the borough's Conservation Strategy sets out a clear vision that recognises and embeds the role of heritage in planning and design. This policy therefore reflects the Conservation Strategy, by setting out the parameters within which development can sustainably take place while also preserving the most important parts of the borough's heritage. The importance of heritage needs to be balanced with the borough's other needs, including the need to provide good-quality housing and reduce overcrowding, and this policy sets out a proportionate response to this challenge.

14.122 Part 1 of the policy sets out the overall aim of preserving and enhancing heritage assets throughout the borough.

14.123 Designated heritage assets include statutorily listed buildings and structures, registered parks and gardens, conservation areas, scheduled monuments, world heritage sites and their buffer zones (see Policy PS7), and archaeological priority areas. These designations are shown on the policies map.

14.124 In addition to the above, there are many non-designated buildings and sites of heritage significance within the borough which contribute to its distinctive character, such as unregistered parks and gardens, London Squares, unlisted public houses, cemeteries, and places of worship. Details of some of these assets are available in the Tower Hamlets Conservation Strategy, Conservation Area Character Appraisals and Management Guidelines and the Local List. The Local List identifies locally important heritage assets which are of community

value and contribute to the special character and distinctiveness of the borough.

14.125 Alongside their physical characteristics, heritage assets can also have a more intangible cultural significance and can include sites that are not yet designated as heritage assets but which have significant cultural value for particular groups of people, including marginalised groups. Within Tower Hamlets, certain locations may have intangible cultural value for particular sections of the community. The initial process of consultation and engagement with the community around the design and development of sites should help to identify where significance exists, and to identify the elements of a site that the local community considers to be of heritage value. This further highlights the importance of that engagement taking place at the earliest possible stage to inform the design response.

14.126 Parts 2-6 set out the approach to be taken when development proposals affect the significance of heritage assets, while parts 7-12 provide additional detail about proposals that would affect the significance of specific classes of heritage asset. In all cases, the preference is for no harm to take place; but in circumstances where there is some harm to heritage assets, this must be robustly justified, and in the case of designated heritage assets any harm must be justified with reference to the public benefits of the proposal in question.

14.127 In order to satisfy the criteria set out in parts 2 to 12, developments will need to demonstrate an understanding of the significance of the relevant asset, including the contribution setting makes to its significance, submitting a statement of significance, including a heritage impact assessment, as part of the planning

application process. This should also consider an assessment of group value, as well as the individual significance of heritage assets.

14.128 At a minimum, this should include both desktop analysis and on-site investigation, with reference to the Greater London Historic Environment Record and other relevant documentation. The borough has a local history library, which provides a useful resource. Research undertaken into the heritage asset affected should describe the significance of the heritage asset in sufficient detail to determine its historic, archaeological, architectural, or artistic interest to a level proportionate to its importance.

14.129 Detailed plans to an appropriate level will need to be submitted with applications as part of design and access statements/heritage statements to demonstrate how the heritage asset and its setting will be impacted and to ensure that its significance is protected or enhanced.

14.130 Where a new heritage asset is discovered or previously unknown historic fabric revealed, the developer will be expected to work with us to seek a solution that protects the significance of the new discovery, so far as is practicable within the existing scheme. Depending on the importance of the discovery, modifications to the scheme being implemented may be required.

14.131 Under part 2 of the policy, proposals relating to works to a listed building or within the vicinity of a listed building or to other heritage assets will be required to demonstrate that they will not affect the special interest of the listed building or heritage asset. In addition to planning permission, listed building consent may also be required for works that will affect the special character of a listed building. Harm to the significance of a heritage asset will not ordinarily be supported. Where such harm is proposed, proposals will need to include robust



justification of why the public benefits of the proposal outweigh the harm to heritage significance, and will need to demonstrate that alternative options that avoid harm have been explored and found unfeasible, and that the proposed harm has been mitigated to the greatest degree possible.

14.132 The council will not permit substantial harm to or total loss of a designated heritage asset unless the criteria set out in part 3 can clearly be met. In instances of less than substantial harm to a designated heritage asset, the test in part 4 should be applied.

14.133 Part 5 emphasises that non-designated heritage assets should also be considered as part of development proposals, and proposals should aim to conserve or enhance these assets as well. Early engagement with planning officers is encouraged to help identify non-designated heritage assets. When considering applications that affect non-designated heritage assets (either directly or indirectly), the council will have regard to the scale of any harm or loss, and the significance of the heritage asset when making a planning decision.

14.134 The council will only permit proposals for alterations to heritage assets or for development that affects the setting of a heritage asset where the criteria set out in part 6 can be met.

14.135 In the case of changes of use of heritage assets, as set out in part 7, it is important to note that while a change of planning use class might be acceptable in theory, the practical implications of that change of use in terms of any alterations to the fabric of the building will need to be assessed in terms of how they affect the significance of the heritage asset, and whether they help to secure the optimum viable use of the asset. The optimum viable use of a heritage asset may not necessarily be the most economically viable use – if there is a range of economically viable uses, the optimum viable use is the one which will cause the least harm to the significance of the heritage asset. Before applying for a change of use of a heritage asset, careful consideration should be given to any physical changes that would be needed, and these should be clearly set out and justified as part of a planning application. The council's preference for changes of use to historic buildings is for buildings to be repurposed to help meet the borough's high need for housing, and particularly affordable housing. However, it is acknowledged that this will not always be possible given the particular sensitivities of heritage buildings and the difficulties that this can create in conversion to residential.

14.136 When considering proposals within conservation areas, as set out in part 8, consideration will be given to the relative significance of the element affected and its contribution to the significance of the conservation area as a whole and its setting. We have prepared a series of conservation area appraisals and management plans that assess and evaluate the character and appearance of each of our conservation areas and set out how we consider they can be preserved or enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a way that retains the distinctive character and appearance of our conservation areas and will expect new development to contribute positively to this.

14.137 Proposals that would affect scheduled monuments must meet the criteria set out in part 9.

14.138 In relation to part 10, any development within or adjacent to archaeological priority areas is required to investigate and consider any archaeological interests in the area. The archaeology of the borough can best be protected if as much information as possible is available at the planning application stage. The evaluation, which may involve fieldwork, is needed so that we can assess the archaeological implications of proposals. Where appropriate, the evaluation may show how developments can be designed so that they do not harm a site of archaeological interest and/or how the remains will be preserved at the site.

14.139 Proposals that would affect historic parks and gardens must meet the criteria set out in part 11. This policy applies to both designated and non-designated historic open spaces, which includes registered parks and gardens, London Squares, and other open spaces of historic interest.

14.140 Where possible, we will seek to work with developers and other partners to secure creative solutions that would conserve heritage buildings, especially those at risk (as identified on the borough's heritage at risk register), and contribute positively to the character and vitality of the surrounding area. Under part 12 of the policy, proposals that bring heritage assets that are at risk back into viable, long-term use will be encouraged where they also preserve the heritage significance of the asset.

14.141 The borough contains some sites where historic street surfaces or street furniture (such as bollards, street signs, and coal hole covers) are present, and part 13 requires these features to be preserved and enhanced by development of adjacent sites. Historic surfaces can cause difficulties for those who use wheelchairs or have other mobility impairments, or for parents with pushchairs, and consideration should be given to accessibility and inclusivity in locations with historic surfaces. This could include ensuring that pavements to the side of cobbled streets are suitably wide and well-maintained, or clearly signposting alternative routes that avoid uneven surfaces.

14.142 Part 14 indicates that retrofitting of heritage assets to achieve greater energy efficiency is to be encouraged, in line with the council's policies on climate change and improved air quality. However, this needs to be done carefully to ensure that heritage assets are not damaged in a way that is contrary to the rest of the policy, and so in some instances a balance may need to be struck between the need to improve energy efficiency and the protection of heritage. Retrofitting of heritage assets should take a non- or minimally-invasive approach, and this may require that bespoke and non-standard approaches to energy efficiency are

taken. Regard should be had to Historic England's advice note on Energy Efficiency and Traditional Homes.

14.143 Where necessary, the council will consider using legal powers to ensure that essential maintenance of designated heritage assets is undertaken.

London Plan policies:

- HC1 Heritage conservation and growth

Local Plan policies:

- CG4 Embodied carbon, retrofit and the circular economy

Evidence base:

- Conservation Strategy, 2023
- Conservation Area Character Appraisals and Management Guidelines
- Local Heritage List
- Heritage at Risk register

Policy PS7 World heritage sites

1. Development is required to ensure it safeguards and does not have a detrimental impact upon the outstanding universal value of the UNESCO world heritage sites: the Tower of London and Maritime Greenwich, including their buffer zones (as shown on the policies map) and settings.
2. Proposals affecting the wider setting of the Tower of London and Maritime Greenwich or those impinging upon strategic or other significant views to or from these sites (particularly around Tower Hill and Aldgate and within the buffer zone around Island Gardens) will be required to demonstrate how they will conserve and enhance the outstanding universal value of the world heritage sites.
3. Development within the vicinity of the Tower of London is required to demonstrate how it will improve local pedestrian and cycle access routes, particularly through signage and wayfinding in the surrounding area.



Supporting text

14.144 This policy aims to ensure that new development safeguards and does not negatively impact on the 'outstanding universal value' of the Tower of London and Maritime Greenwich world heritage sites, including their attributes, settings, and views to and from them. In this context, outstanding universal value is defined by UNESCO as "areas of cultural and/or national significance so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity". Attributes of outstanding universal value are usually physical, but can also be processes or practices (such as tradition, or management regimes) that have an impact on physical quantities.

14.145 World heritage sites are areas of cultural and national significance which include both natural features and human-made structures. London has four world heritage sites, one of which is within Tower Hamlets (the Tower of London), and one of which is just across the river Thames in Greenwich, and with a buffer zone that extends into Tower Hamlets (Maritime Greenwich).

14.146 The Tower of London, one of the UK's most famous landmarks and tourist attractions, is a Grade I listed castle and royal fortress, which acts as the gateway into the borough from the west. Indeed, the borough is named after the villages and hamlets around the Tower of London. However, many of the streets and spaces in and around this area are dominated by vehicles/heavy traffic and offer a poor public realm and interchange experience from Tower Hill and Tower Gateway stations. These issues are also identified within the Tower of London World Heritage Site Management Plan.

14.147 Maritime Greenwich lies immediately south of the borough and

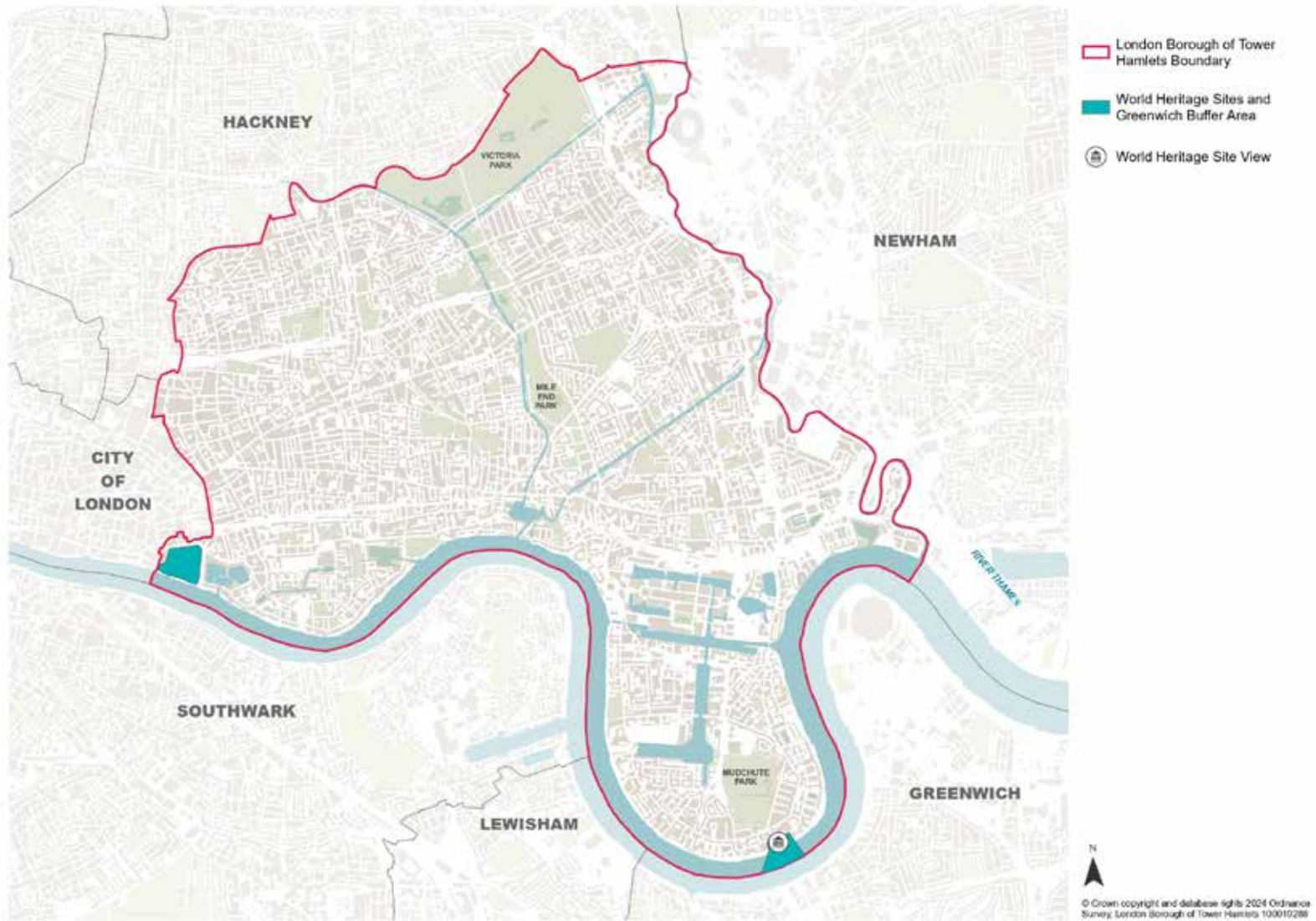
comprises an ensemble of buildings (including the Queen's House, Royal Observatory, and the Old Royal Naval College) set in landscaped parkland. Part of the buffer area lies within Tower Hamlets at Island Gardens on the Isle of Dogs, from where a classic view of the world heritage site can still be seen.

14.148 Part 1 of the policy sets out that these unique heritage assets must be safeguarded, and that development must not detract from the outstanding universal value for which they have been designated.

14.149 Under parts 2 and 3, proposals within close proximity to the Tower of London, or which have the potential to affect the setting and views of the Tower of London or Maritime Greenwich, will need to ensure they have regard to the Tower of London World Heritage Site Management Plan and/or the Maritime Greenwich World Heritage Site Management Plan.

14.150 Potential opportunities exist to enhance the setting immediately around the Tower of London and reinforce the outstanding universal value of the site, in line with the Tower of London Local Setting Study (2010).

Figure 14: World heritage sites – Tower of London and Maritime Greenwich buffer zone



London Plan policies:

- HC1 Heritage conservation and growth
- HC2 World Heritage Sites

Local Plan policies:

- MC2 Active travel and healthy streets

Evidence base:

- Views and Landmarks Study, 2024
- Conservation Strategy, 2023
- Tower of London World Heritage Site Management Plan, 2016
- The Protection and Management of World Heritage Sites in England, 2015
- Maritime Greenwich World Heritage Site Management Plan, 2014
- London View Management Framework SPG, 2012
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011

Policy PS8 Shaping and managing views

1. Development is required to positively contribute to views and skylines within the borough, particularly those that are important components of the character of Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. Development will be required to demonstrate how it:
 - a. complies with the requirements of the London View Management Framework and World Heritage Site Management Plans for the Tower of London and Maritime Greenwich;
 - b. positively contributes to the skyline of strategic importance, which is formed from the silhouettes of the cluster of tall buildings around Canary Wharf (as defined on the policies map);
 - c. preserves or enhances the prominence of borough-designated landmarks and the skyline of strategic importance in the borough-designated views, taking into account the reasons for designation and the guidance for future development provided in the Tower Hamlets Views and Landmarks Study;
 - d. preserves or enhances local views identified in conservation area appraisals and management guidelines;
 - e. preserves or enhances visual connections between the public realm and water spaces and open spaces; and
 - f. enhances, creates, or preserves townscape and views to and from the site which are important to the identity and character of the place.
2. Development in close proximity to, or within the sightlines of, borough-designated landmarks should apply the following principles, to ensure that the value of these landmarks is protected:

Landmark	Principles
Christ Church Spitalfields	<ol style="list-style-type: none"> a. Future development on Brushfield Street must not step out beyond the existing building line to preserve the view of the church. b. Building heights should not be higher than the church in order to ensure the landmark stands out from its immediate context. c. Nearby development should ensure that the heights allow an unobstructed view of the church's rooftop, particularly its spire. d. The commercial and fine grain character of the ground floor on surrounding streets should be maintained to enhance the wider character of the Conservation Area.

Landmark	Principles
Balfron Tower	a. Future development should maintain a view of the clear separation between the servicing/lift tower and the main body. b. Development should maintain the sky space to either side and at the top of the tower to preserve the clear views of Balfron Tower. c. The green and open character within these views should be preserved to enhance the setting of the tower.
Canada Square Cluster	a. Development should not obstruct the gaps between buildings in the Canada Square Cluster to preserve readability, balance, and aesthetics. b. Development should not interfere with the Canada Square Cluster's long range views, to preserve Canary Wharf's distinctive skyline. c. Any future built interventions in Canada Square Park should not have a negative impact on legibility and wayfinding and should enhance the cluster's identity as a unified landmark.
St Anne's Church	a. The massing around the intersection of Commercial Road and West India Dock Road should be designed in a way that preserves and frames views to the church tower above the trees. b. Heights on Salmon Lane should remain low to accentuate the views of the church with Canary Wharf in the background.
St George-in-the-East Church	a. Heights along Chigwell Hill, Wapping Lane, and The Highway should remain low to maintain and frame views to the church tower and turrets. b. Building frontages on The Highway should be articulated to contrast the large composed southern façade of the church and to complement the historic terraces on Cable Street to the north.
East London Mosque	a. Future development along Whitechapel Road should consider an articulated massing to avoid overwhelming the mosque. b. Massing should respect views to the minarets to protect their visibility.
The Guardian Angels Roman Catholic Church	a. Heights should remain similar to the existing historic roofline on Mile End Road. b. Heights should not exceed the ridgeline of the church to maintain the primacy of the church tower and spire. c. Development should not exceed the existing building line to preserve views of the church. d. Street frontages of future development should be harmonious with the existing historical facades to maintain the character of the street.

Supporting text

14.151 This policy aims to ensure that important views within, into, and across the borough are preserved through appropriate management of development. This is in line with the council's statutory duties to protect heritage assets, the requirements of the London View Management Framework, and the requirement of the London Plan for boroughs to identify important local views in their local plans.

14.152 Views are important elements of townscape and local character, and can provide a positive image of the borough, enhance legibility, and increase the pride that residents feel in their local area. Townscape views can be valued for a variety of reasons, but often the most valued views will feature a prominent landmark building that terminates a vista, acts a focal point, or establishes some other form of spatial hierarchy and ordering. Such landmarks help to define and identify places and are considered to be a key component of high-quality urban design.

14.153 New developments are expected to make a positive contribution to the skyline, including in their use of palette and texture, in particular where these buildings will have an impact on long-distance views.

14.154 This policy identifies a skyline of strategic importance which is observed from multiple locations within and outside the borough, and a series of views and landmarks of a borough-wide importance.

14.155 Part 1(a) refers to strategic views identified in the latest versions of the London View Management Framework and Tower of London and Maritime Greenwich World Heritage Site Management Plans which have impacts on developments within Tower Hamlets.

14.156 Part 1(b) refers to the group of tall buildings around Canary Wharf that form a distinctive cluster, referred to as the 'skyline of strategic

importance' (SSI). This cluster is visible across London and has become a globally recognised silhouette. The distinctive skyline is a prominent and recognisable feature in views from the surrounding areas, which are of a much smaller scale. The area of skyline of strategic importance covers the Canary Wharf tall buildings zone (zone B), as shown on the policies map and set out in Policy PS2. Building heights within the designation area should highlight the central emphasis of the SSI at One Canada Square, to ensure a consistent and coherent skyline. The heights in the setting of the skyline of strategic importance should be consistent and significantly lower than the buildings at the edge of the designation area.

14.157 Part 1(c) refers to borough designated landmarks, which are prominent buildings of high architectural and/or cultural value that can be seen in views to and from a number of places within the borough, including conservation areas. These views are referred to as borough designated views. Development should be tested against their impact on the prominence of borough designated landmarks in borough designated views. Intrusive development (as defined in the glossary) that competes with the prominence of borough-designated landmarks in the backdrop of the borough-designated views or obscures them at the mid or foreground will need to be reconsidered to reduce its intrusiveness. The council has prepared a Views and Landmarks Study that explains the significance of the borough landmarks and sets out guidance for future development within the setting of the landmarks. Proposals within these areas should demonstrate that they have taken account of this guidance.

14.158 Part 1(d) seeks to shape and manage the impact of development on views identified in the Conservation Area Character Appraisals and Management Guidelines covering each of the borough's 58 conservation areas. Development that is harmful to the special character of these views will be resisted.

14.159 Part 1(e) recognises that water space and open space are intrinsic elements of the borough's identity and that their presence is an essential element of the character of a place. Development should

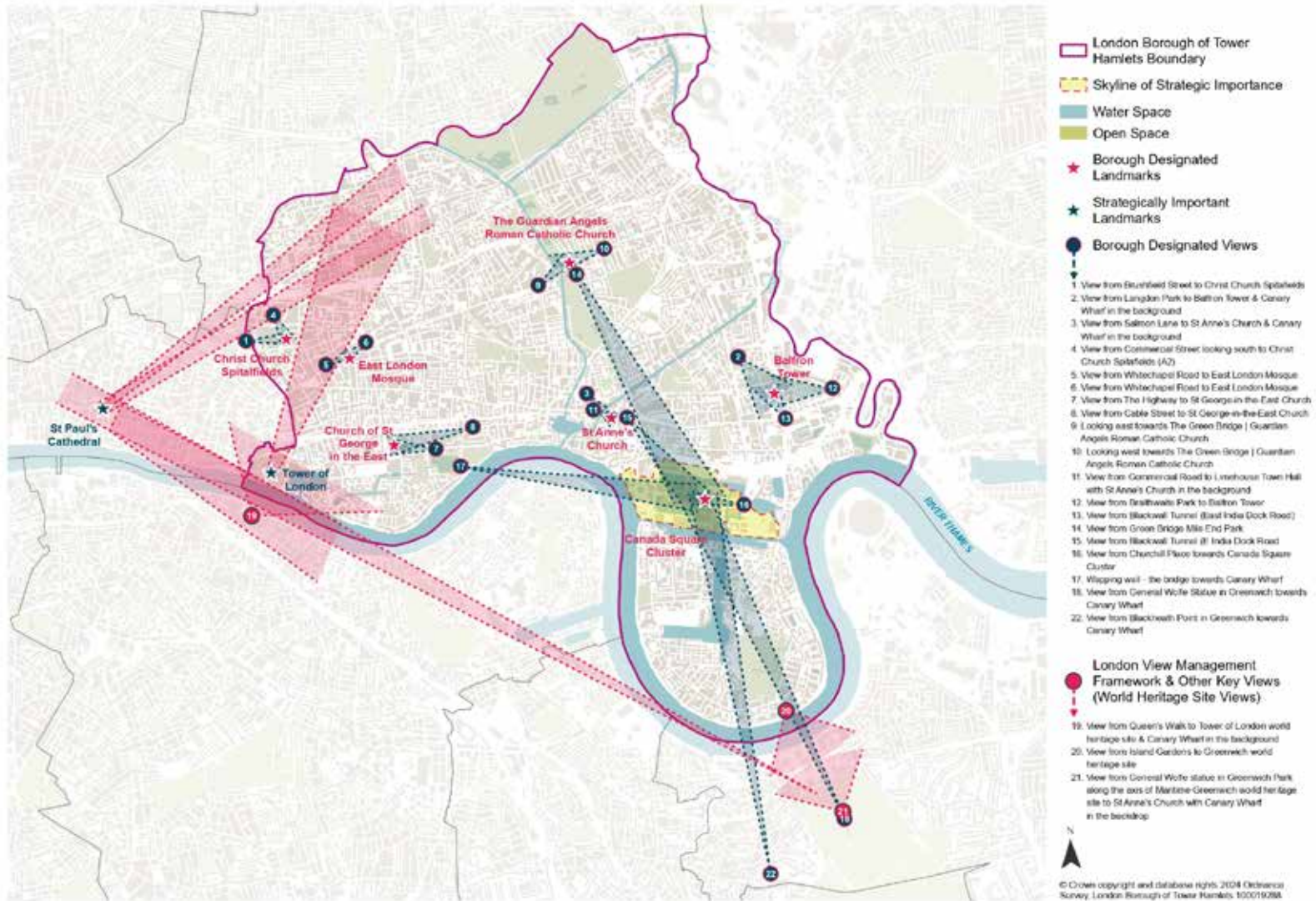
14.160 therefore avoid severing visual connections between the existing public realm and water or open spaces; and should aim to provide enhanced visual connections to water or open spaces through the layout and design of the development. Developments located adjacent to water or open spaces, or on streets in their direct vicinity which are parallel and perpendicular to them, should afford views and glimpses of these sites from the street level.

14.161 Part 1(f) seeks to shape and manage the impact that development would have on townscape and local views that are important to the identity of Tower Hamlets and its unique places. These will be identified on a case-by-case basis through the townscape and visual impact analysis in relation to a particular development. Due to relatively flat topography, tall buildings located in the borough can

14.162 be seen from significant distances. It is therefore important that tall buildings positively contribute to the legibility, character, and spatial structure of the borough's 24 places.

14.163 Part 2 sets out principles for development within close proximity to the borough-designated landmarks or within their sightlines. These principles have been derived from the Views and Landmarks Study developed as part of the plan's evidence base, and ensure that views of these important landmarks will be protected.

Figure 15: Protected views



London Plan polices:

- HC1 Heritage conservation and growth
- HC3 Strategic and local views
- HC4 London View Management Framework

Local Plan policies:

- BO2 Open spaces and the green grid network
- BO3 Water spaces

Evidence base:

- Views and Landmarks Study, 2024
- Conservation Strategy, 2023
- Tower of London World Heritage Site Management Plan, 2016
- Maritime Greenwich World Heritage Site Management Plan, 2014
- London View Management Framework SPG, 2012
- Conservation Area Character Appraisals and Management Guidelines

Policy PSg Shopfronts

1. New or replacement shopfronts are required to be robust and well-designed and meet the following requirements:
 - a. The retention of historic shopfronts or features of architectural quality or interest, which may include signage. These elements should be retained, refurbished, and sympathetically incorporated into new development or changes of use. Lost features which are characteristic of adjoining properties should be reinstated;
 - b. shopfronts should remain active, with large, generous shop windows, adequate entrance doors, good proportions, and careful detailing;
 - c. a sensitive relationship between the shopfront and the upper floors is created, by ensuring that the new shopfront integrates well into the host building, and respects its scale, style, age, and character;
 - d. a sensitive relationship with surrounding shopfronts and buildings;
 - e. use robust and durable materials which are appropriate to and enhance the local character of the building and townscape. Where the shop is a heritage asset, appropriate heritage materials will normally be expected, including timber framing;
 - f. that shopfronts are designed in a way that is flexible and adaptable to alternative uses;
 - g. the provision of level entrances where possible – where ramps are required, they should be internal, unless exceptional circumstances apply. Materials and finishes of ramps should be

appropriate and of high quality;

- h. maintain or include independent access to upper floor accommodation from the street frontage as part of an integrated design;
 - i. clearly incorporate the street number; and
 - j. ensure security measures are integral to the overall design to avoid the need for retrofitting external shutters.
2. Shop signage should:
 - a. be accommodated solely within a defined fascia above the façade. Fascia signage should not noticeably exceed one-fifth of the height of the ground floor accommodation;
 - b. not be excessive, visually discordant, overly large, project excessively forward or extend the façade above the ground floor level;
 - c. be defined by permanent, integrated architectural detailing;
 - d. be restricted to one fascia above each shop window and one projecting or hanging sign per façade. A hanging sign should not exceed 600mm x 600mm x 80mm and should be at least 2.4m above the footway;
 - e. if required, illumination should be incorporated in a discreet and sensitive manner without overly dominant fittings, clutter, or cables. Lighting should be limited to the advertisement element (logos and words), and not the full width of the fascia; and
 - f. where significant historic fascia signage is present, it should be preserved, and proposals for changes to the shopfront should be designed to accommodate its retention.

Supporting text

14.164 This policy seeks to ensure that shopfronts are attractive, well designed and make a positive contribution to the surrounding streets, spaces and public realm and thereby enhance the overall character and appearance of the borough.

14.165 Part 1 of the policy sets out the requirements for all new or replacement shopfronts. Heritage elements of shopfronts should be retained and enhanced in line with policy PS6, and should provide active frontages onto streets in line with policy PS4. Shopfronts which form part of a group of original shopfronts and/or are designated heritage assets or within conservation areas should be of a traditional design and incorporate traditional features and character, and use traditional materials. Such developments should avoid the use of neon lighting, animated electronic displays, and external solid shutters.

14.166 Shopfronts should incorporate a well-defined frame, including location of signage, stall-riser, door and window units which sit in a defined architectural surround, use appropriate high quality, sustainable materials and be of a scale which relates to the upper floors of the building and complements the quality and character of surrounding buildings.

14.167 Achieving a sensitive relationship between the shopfront and its surroundings means, for instance, that shopfront fascias should be within the width of a single building and should not extend above the ground floor or obscure architectural features of value. On a historic building, the fascia sign height shall be dictated by any prevailing original pilaster detailing. On new-built development, a projecting band or cornice should be built into the façade to clearly demark a line between the fascia and the floor above.



14.168 The introduction of planning use Class E has provided a significant amount of flexibility for town centre uses. The design of shopfronts should take into account this potential flexibility, and should be designed to be adaptable to plausible alternative uses. This could include a consideration of how to sensitively incorporate flues into the façade if the building is converted into a use that includes food production in the future.

14.169 Shopfront design should be an integral part of the design process with consideration given to how security measures are incorporated to maintain active frontages at all times. 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.

14.170 Consideration should be given to the potential for including energy efficiency measures into the design of shopfronts, where these would be appropriate within the context. This could include double glazing, natural ventilation features, or awnings to provide shade.

14.171 Part 2 of the policy relates specifically to the requirements of shop signage, which should be carefully designed and located to contribute positively to the townscape.

14.172 In relation to part 2(f), historic signage provides valuable insight into a building's history and an area's social and economic development. Where historic signage with heritage significance needs to be preserved, it may be appropriate to consider placing the new signage within the shop window to enable this.

Local Plan polices:

- TC2 Protecting the diversity, vitality and viability of our town centres
- TC3 Town centre uses outside our town centres
- TC5 Food and drink
- TC6 Entertainment uses
- TC7 Evening and night-time economy

Evidence base:

- Shopfront Design Guide, 2024
- Conservation Area Character Appraisals and Management Guidelines



Policy PS10 Advertisements, hoardings and signage

1. Advertisements, hoardings, and signage must be well-designed and well-integrated within the public realm, host buildings and the surrounding area. Proposals will be supported where they demonstrate how they:
 - a. complement the character, appearance and visual amenity of the site and the surrounding area;
 - b. do not have an adverse impact on the setting or significance of heritage assets (including conservation areas and listed buildings) and do not obscure architectural features;
 - c. do not intrude into the outlook of nearby residents;
 - d. do not adversely affect public or highway safety or impede pedestrian access, including for those with visual impairment or impaired mobility;
 - e. enhance the visual amenity of construction sites and vacant or underused sites/buildings and the surrounding area, including through the use of appropriate lighting;
 - f. are subservient in relation to the streetscape or the buildings to which they are attached;
 - g. do not create or contribute to a proliferation of signs and advertisements which cause physical or visual clutter in the streetscape; and
 - h. minimise light pollution and intrusive lighting infrastructure.

2. Within conservation areas, advertisements, signage, and hoardings should:
 - a. complement the special character of the area;
 - b. not be above fascia or ground level;
 - c. be externally illuminated; and
 - d. Restrict projecting or hanging signs to one per frontage.
3. Applications for telephone kiosks which have display panels for advertisements (whether electronic or non-electronic) and are located within 400m of a school will only be permitted where there is a condition or other agreement with the council in place to restrict the advertising of high fat, salt, and sugar (HFSS) products.
4. Applications for telephone kiosks will only be supported where they do not create a distraction hazard for road users or pedestrians, lead to excessive visual clutter in the streetscape, or create an inappropriate restriction on the amount of space available to pedestrians

Supporting text

14.173 This policy aims to ensure advertisements, hoardings and signage positively activate the streetscape and enhance the visual appearance of their host buildings or structures.

14.174 Part 1 provides guidance on the appropriate design and settings of advertisements, hoardings and signage (including fascia and hanging shop signs, A-boards, poster panels, digital billboards and free-standing advertisements).

14.175 The council recognises that well-designed features in the streetscape can make a positive contribution to the public realm and play an important role in providing local information and supporting local businesses. However, poorly designed, excessive, or overly dominant features can have negative impacts on the character and appearance of their surroundings and can create hazards for pedestrians and traffic.

14.176 Advertisements, hoardings, and signage should be in keeping with the character of the area and should not negatively affect the amenity of surrounding properties or highway/public safety. There is a particular need to avoid physical and visual clutter in the streetscape as well as problems arising from distraction among road users and pedestrians. For instance, the location of A boards in areas where the width of the footway is less than 2 metres will be resisted. Poster panels/freestanding adverts will generally be out of place within residential areas due to their scale, size, and intrusive nature.

14.177 External illumination for signage will need to be carefully considered at an early stage in the design process to ensure that lighting can be sensitively incorporated, where required.

14.178 Provision of public artwork or other visual concepts on hoardings will be supported and encouraged, where it can enhance the local streetscape and improve the appearance of construction sites.

14.179 Part 2 provides guidelines for advertisements, signage, and hoardings in conservation areas. The design should complement the historic character of the conservation area in terms of scale, location, composition, and materials applied. In some cases, projecting or hanging signs may need to be raised above the fascia to retain the historic features. In other instances, the height of some traditional shopfronts means projecting or hanging signs may need to be placed higher for safety reasons. Any lighting associated with advertisements, signage or hoardings should be discreet and well placed so that it does not interfere with the visual amenity of the historic environment. External lighting should generally be used within conservation areas rather than internal illumination, due to the potential impact on heritage assets; but proposals for such lighting will still need to be carefully considered in the design process to ensure they are sensitively incorporated into the area.

14.180 Part 3 aims to control the presence of unhealthy advertising in the vicinity of schools, in line with the council's adopted healthy advertising policy. Telephone kiosks are increasingly used as a method of displaying advertising, but due to recent changes to the General Permitted Development Order are no longer considered to be permitted development and now require planning permission. Within 400m of a school, this permission will only be granted where a condition can be placed on the permission (or some other form of acceptable agreement can be reached) to not allow the advertising of high fat, salt, and sugar (HFSS) products. This is to reduce the exposure of children and young people to HFSS advertising, which can negatively impact their health.

14.181 Part 4 of the policy also sets out general criteria for the placement of telephone kiosks.

London Plan policies:

- D8 Public realm

Local Plan policies:

- EG2 New employment space
- TC2 Protecting the diversity, vitality and viability of our town centres
- TC3 Town centre uses outside our town centres
- TC5 Food and drink
- TC6 Entertainment uses
- TC7 Evening and night-time economy
- TC8 Short stay accommodation
- MC1 Sustainable Travel
- MC2 Active travel and healthy streets
- MC3 Impacts on the transport network

Evidence base:

- Spatial Planning and Public Health Needs Assessment, 2023
- Signs and Advertisements Guidance Document
- Conservation Area Character Appraisals and Management Guidelines

Policy PS11 Siting and design of telecommunications infrastructure

1. Where new sites are proposed for the installation of telecommunications equipment, it must be demonstrated that co-location or mast-sharing on existing telecommunications installations has been explored and is not possible.
2. The installation of new telecommunications apparatus is required to minimise its impact on the street scene and townscape and not unacceptably harm the appearance of heritage assets or unacceptably detract from the amenity of surrounding properties.
3. Telecommunications equipment installed on tall buildings should be integrated into the building design to minimise the impact of its appearance. Where telecommunications equipment protrudes above the top of a building's roofline, this will be included in the calculation of the building's height and may trigger requirements relating to tall buildings.
4. The installation of telecommunications equipment must not create any unacceptable risks to the health, well-being, or security of residents or users of surrounding and nearby sites.

Supporting text

14.182 This policy aims to ensure that the design and location of telecommunications equipment does not create a safety hazard or detract from the character of their surroundings, taking into consideration the potential impacts on the amenity of the area and local residents.

14.183 Under part 1, proposals to install new telecommunications equipment will be required to submit a written report alongside the planning application demonstrating that efforts have been made to source compatible equipment to existing installations and to identify opportunities for co-locations. Where co-location is not possible, the report should clearly set out the efforts that have been taken, and the reasons why co-location is not feasible.

14.184 Part 2 aims to ensure that the installation of telecommunications equipment does not conflict with the general design, streetscape, and heritage requirements of other policies in this section of the Local Plan.

14.185 Part 3 should be read in conjunction with Policy PS2 on tall buildings. The design of tall buildings needs to be of especially high quality due to their potential impact on the townscape of the borough, and telecommunications equipment has the potential to detract from this design unless it is carefully considered.

14.186 Under part 4, details should be included on the frequency modulation, power output and evidence of how the proposal meets the International Commission on Non-Ionising Radiation Protection to demonstrate compatibility with surrounding uses.

14.187 The council will carry out further work in conjunction with mobile operators and developers to create a Public Realm Mobile Telecom Design Framework which will address design, type of structures, access, and safety. This will require that, prior to approval, future public realm designs must accommodate a 5G small cell capability.

London Plan polices:

- D9 Tall Buildings
- D11 Safety, security and resilience to emergency

Local Plan polices:

- CG10 Noise and vibration

Evidence base:

- Conservation Area Character Appraisals and Management Guidelines

15. Inclusive economy and good growth

EG1 – Creating investment and jobs

EG2 – New employment space

EG3 – Affordable workspace

EG4 – Loss and redevelopment of employment space

EG5 – Railway arches

EG6 – Data Centres



Introduction

15.1 Tower Hamlets has a strong tradition of entrepreneurialism, playing host to some of London's oldest markets. The borough's industrial sites play host to a diverse range of businesses, from food production to building suppliers to clothing manufacturers. The borough's wide variety of office spaces house many small businesses from accountants and solicitors that serve their local neighbourhood to growing enterprises with markets across London and beyond. The local economy is essential to tackling economic inequality and the skills gap. It provides employment, training, and career progression opportunities to local residents.

15.2 Tower Hamlets also plays a significant role in London's global economy. The west of the borough forms part of the CAZ (see Figure 16) which contains London's core functions and activities, such as government administration, culture, and business. Canary Wharf and the surrounding area, located in the north of the Isle of Dogs, is classified as a CAZ Satellite by the London Plan and contains some of the world's largest financial and professional service organisations. In addition to supporting London's economy, these businesses also play an important role in providing employment opportunities to local residents.

15.3 The past few years have seen a significant change in the use and nature of employment space in the borough. The COVID-19 pandemic has hastened national trends that were already in evidence, including an increase in working from home and in e-commerce. This shift is still on-going, and it remains to be seen to what extent these trends will become permanent.

15.4 While there has been a reduction in demand for large offices spaces suitable for global and national corporations, particularly in

Canary Wharf, there remains strong demand for smaller spaces suitable for local independent businesses and start-ups. Over the past few years, the demand for local independent business and start-up workspace has spread from a cluster in the west of the borough around Whitechapel and Spitalfields to cover most areas of the borough.

15.5 Over the past several years, the UK has also seen a significant increase in demand for industrial spaces, with especially strong demand for logistics facilities to support the increase in e-commerce. While this trend began before the pandemic, the lock-downs and changed behaviours around visiting shops led to a rapid acceleration in online shopping, which requires significant warehousing and logistics space. This rise in demand for industrial space comes at the end of a long period in Tower Hamlets and London more widely of converting industrial land to residential and other uses. As a result, the pressure on the borough's remaining industrial land is significant, leading to higher rents that undermine the affordability of workspace for local businesses and entrepreneurs.

15.6 Table 6 presents the projected growth in employment within Tower Hamlets over the period 2023 to 2038.

15.7 Table 7 applies the projected change in jobs in the borough to the need for floorspace, demonstrating that there is sufficient supply of sites identified for future office floorspace. There is however a shortfall of industrial floorspace compared to demand as a result of significant losses of industrial land in the borough in recent years and the displacement of businesses into the borough from the City of London and other inner London boroughs where they have been forced out by higher rents and land values. As such, it is vital that existing provision is protected and that new floorspace is encouraged in appropriate locations to service the needs of local industry as well as the needs of central London more widely.

Table 6: Jobs forecasts: 2023 to 2038

Jobs	2023	2038	2023-38	2023-38
All jobs	326,629	359,896	33,267	10.2%
Office jobs	188,044	206,852	18,808	10.0%
Industrial jobs	15,753	16,905	1,152	7.3%

Table 7: Floorspace (sqm) forecasts: 2023 to 2038

Property type	Jobs change	Density ratio (sqm/worker)	Net additional floorspace (sqm)	Land required (ha)
Manufacturing	-400	36	-15,200	-3.8
Other Industrial	1,500	36	52,700	13.2
Distribution	100	50	5,500	0.8
Office	18,800	11.3	212,500	6.1
Total land				16.3

15.8 While the industrial projections cannot be met from identified sites in the development pipeline, potential additional capacity exists within designated employment locations through the intensification of existing provision. There are also numerous opportunities for new employment floorspace to be delivered through 'windfall' sites, generally through mixed-use developments across the borough and in the site allocations listed in Section 4.

15.9 This chapter relates to employment uses within the E(g) and B use classes (business, general industrial and storage and distribution) and

sui generis industrial functions (including 'dark kitchens', commercial laundries, etc.). While it is recognized that other use classes generate employment, these are covered within other policy chapters in the Local Plan.

15.10 This chapter also relates to many of the spaces where culture is produced, including film studios, set workshops, recording studios and visual artists' studios, among many others. Where spaces include both the production and consumption of culture, the policies in this chapter will apply alongside Policy CI5.

15.11 This section contains the following policies:

- Policy EG1: Creating investment and jobs
- Policy EG2: New employment space
- Policy EG3: Affordable Workspace
- Policy EG4: Loss and redevelopment of employment space
- Policy EG5: Railway arches

Policy EG1 Creating investment and jobs

1. The council will support development proposals which provide opportunities to maximise benefits to local independent businesses (small and micro enterprises) and local residents, delivering investment, providing a range of skills training opportunities and enabling job creation in the borough through:
 - a. reinforcing the borough's designated employment locations, in which development proposals must demonstrate that the role and function of the designation will be maintained and enhanced;
 - b. supporting local traders, entrepreneurs, start-ups, micro, and local independent businesses with access to affordable workspace options across the borough;
 - c. ensuring that the benefits of the new Elizabeth Line, including the stations at Whitechapel and Canary Wharf and other transport schemes will act as a further catalyst for investment and growth in the borough;
 - d. supporting and promoting the competitiveness, vibrancy, and creativity of the Tower Hamlets economy;
 - e. protecting the borough's global, national, regional and local economic roles in delivering jobs and supporting businesses;
 - f. ensuring a range of job opportunities at all levels are provided throughout the borough, particularly within designated employment locations, the CAZ, Tower Hamlets Activity Areas and Metropolitan, District and Neighbourhood Centres;
 - g. closing the current skills gap and wealth inequalities amongst the working population, through improving access to careers

and social mobility, education, training and development opportunities for residents and local businesses and increasing the mix of employment sectors; and

- h. ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space and 'grow-on' space by protecting existing floorspace and encouraging the provision of new floorspace for a range of employment uses.

2. The council will support, protect, and enhance the role and function of the borough's designated employment locations (as defined on the Policies Map) and ensure that the provision of employment floorspace contributes to the borough's target of creating 33,267 new jobs over the period to 2038 in line with the roles and functions as set out below.

Table 8: Designated office locations

Designation	Role and function	Location
Canary Wharf Preferred Office Location (CW POL)	This area is a globally significant location for financial and business services. It will also expand and diversify its workspace to support local independent businesses and emerging industries. Canary Wharf's unique contribution to London's employment and economy should be promoted and enhanced. Residential development is only appropriate within the Canary Wharf Preferred Office Location (CW POL) where it comes through the retrofit of existing buildings and it does not undermine the supply of office space to meet the objectively assessed need as set out in Policy EG4.	Canary Wharf (as illustrated on the Policies Map)
Canary Wharf Fringe	Within the North Isle of Dogs CAZ Satellite, but outside of the CW POL, offices and other strategic functions are to be prioritised. In the CW Fringe, residential uses should not exceed 75% of the gross floor area of any development.	Area surrounding Canary Wharf (shown in Policies Map)
City Fringe Preferred Office Locations (POLs)	These contain, or could provide, significant office floorspace to support the role and function of wider Central London. Greater weight is given to office and other strategic CAZ uses as a first priority. Although residential uses can be accommodated, these should not exceed 25% of the gross floor area of any development.	These are illustrated on the Policies Map

Designation	Role and function	Location
Central Activities Zone (CAZ)	This designation contains areas of the CAZ outside of the POLs. They include a greater diversity of uses than the POLs, while providing significant employment floorspace and capacity to accommodate future growth. There are opportunities for provision of office and other strategic CAZ functions as part of employment-led or mixed-use schemes. Residential uses are supported as part of mixed-use schemes although the proportion of residential floorspace should not exceed 75% of the gross floor area of any development.	This is illustrated on the Policies Map

Table 9: Designated industrial locations

Designation	Role and function	Location
Strategic Industrial Location (SIL) P 246	This designation plays an important sub-regional industrial, warehousing and waste management role serving not just the borough but other parts of central London. Residential uses are not suitable in these locations due to potential conflict with existing and future industrial uses, and the pressure on industrial sites from high demand. These areas should be retained in industrial (Class E(g)(iii) or Class B) uses.	Empson Street (as illustrated on the Policies Map). This should be safeguarded in accordance with London Plan policies. Fish Island/Bow Goods Yard – This area currently falls within the LLDC’s planning authority, but planning powers for this area will return to Tower Hamlets from 2025. This area includes the Bow Midland Rail Freight Terminal, which is safeguarded for freight transfer. It will be safeguarded in accordance with London Plan policies.

Designation	Role and function	Location
Local Industrial Locations (LIL)	<p>LILs provide important areas of light-manufacturing/ industry and warehousing to meet a more local need and provide local employment opportunities, as well as to support the needs of the global business centres of Canary Wharf and the City of London.</p> <p>Residential uses are not suitable in these locations due to potential conflict with existing and future industrial uses, and the pressure on industrial sites from high demand. These areas should be retained in industrial (Class E(g)(iii), Class B, or industrial Sui generis) uses.</p>	<p>Blackwall Trading Estate Gillender Street Poplar Business Park The Highway Thomas Road Cannon Workshop Wick Lane and Crown Close, Fish Island These are illustrated on the Policies Map.</p>

Designation	Role and function	Location
<p>Local Mixed-use Employment Locations (LMEL)</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 248</p>	<p>These are areas of high accessibility that provide or could provide significant capacity for employment accommodation meeting secondary, local or specialist employment needs, and to support the needs of start-ups, small-to-medium enterprises, grow-on space, and creative and digital industries. They are generally suitable for a wider range of uses than Preferred Office Locations and CW Fringe, and may include light industrial and/or residential uses alongside traditional office uses. Residential uses will be supported in these locations where they meet the criteria of Policy EG4.</p>	<p>Blackwall – which provides secondary large floorplate offices and, smaller units suitable for small-to-medium enterprises which support the needs of Canary Wharf and the City of London. This area has seen significant growth in the higher education sector, and is particularly suited to this type of use, given its good public transport connections and campus-like public realm. This area also includes a significant cluster of data centres that provide storage and data processing for businesses in Canary Wharf and the City of London.</p> <p>Cambridge Heath – which provides a range of office, industrial and studio workspaces meeting the needs of businesses serving a more local need, start-ups, small-to-medium enterprises, and creative industries.</p> <p>Tower Gateway East – which provides a variety of units supporting both local need and the needs of businesses within surrounding POLs and the City of London.</p> <p>Whitechapel – which provides small office spaces meeting local needs alongside a bio-tech and life sciences sector, creative and knowledge-based industries and growing demand from an eastwards expansion of the City of London.</p> <p>These are illustrated on the Policies Map.</p>

Designation	Role and function	Location
Creative Enterprise Zone (CEZ)	<p>The Hackney Wick and Fish Island Creative Enterprise Zone (CEZ) contains a significant cluster of businesses working in the creative and cultural sectors. Development in this area will prioritise workspace that supports the creative industries and will have regard to Part C of London Plan Policy HC5.</p> <p>The CEZ also includes a significant warehouse living community that relies on informal spaces to both live and carry out creative production work. This space will be protected as both housing and employment space on the basis that it meets needs for both types of use.</p>	<p>The Hackney Wick and Fish Island CEZ is an area in the northeast of the borough. Historically, it was nearly entirely industrial but has become a mixed-use community with a large arts sector. The CEZ also extends into the London Borough of Hackney.</p>
Safeguarded Wharves	<p>Tower Hamlets includes two safeguarded wharves as designated by the London Plan. While these locations are not considered designated employment locations, they do play an important role in the borough's economy by allowing heavy goods to be transported by water.</p>	<p>Orchard Wharf Northumberland Wharf</p>

Designation	Role and function	Location
<p>Railway Arches</p>	<p>Railway arches house a wide range of industrial and other employment uses across the borough. They often provide lower-cost space than would be available in a purpose built building, and play an important role in the borough's economy. Where they are in employment use (use classes E(g), B2, B8 and Sui generis employment uses), this will be retained and development that includes or is adjacent to railway arches will retain access and not undermine the flexible use of the arches.</p> <p>Railway arches can also provide space for community uses and other forms of social infrastructure.</p>	<p>Shadwell-Mile End Arches – these arches are underneath the railway line into Fenchurch Street, extending from Lemn Street to Bow Road (including under the disused railway line alongside Tidworth Street) and contain a diverse range of uses, including a particular cluster of South Asian food wholesalers in Watney Market.</p> <p>Bethnal Green Arches – these arches are underneath the lines into Liverpool Street, extending from Vallance Road to Regent's Canal to the north and Globe Road to the east. These arches contain a diverse range of uses, including a cluster of arts and culture uses around Cambridge Heath.</p> <p>These are illustrated on the Policies Map.</p>

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Table 10: Other Employment Designations

Designation	Role and function	Location
<p>Tower Hamlets Activity Areas and District, Specialist and Neighbourhood Centres</p>	<p>The Tower Hamlets Activity Areas, District Centres and larger Neighbourhood Centres also provide opportunities for office and other employment uses within existing and new buildings.. The Activity Areas in particular have the potential to accommodate substantial employment growth to support the strategic role of the POLs and other parts of the CAZ. These are illustrated on the Policies Map. Tower Hamlets Activity Areas and District and Neighbourhood Centres typically contain a diverse range of office and other workspace types and scales, therefore they are particularly well-suited to providing workspace suitable for local independent businesses.</p>	<p>The Tower Hamlets Activity Areas act as zones of transition between the high-density, business-oriented environments of the CAZ and Canary Wharf and the nearby residential communities. They typically include a mix of uses, including office, light industrial and residential and are generally suitable for mixed-use development including residential.</p> <p>District Centres serve the day-to-day needs of a large catchment area and can accommodate office development, typically at a smaller scale than the POLs, CAZ and Canary Wharf Fringe. These centres can also often accommodate light industrial uses away from the main shopping streets, where they support the vitality and viability of the centre (see town centre policies for more details).</p> <p>The Specialist Centres are town centres equivalent in scale to neighbourhood centres, but that include a unique cluster of businesses that attract visitors from a wider area. For the purposes of employment uses, Columbia Road should be treated as a neighbourhood centre. Redchurch Street includes small-scale offices that complement the ground floor uses, including creative businesses. New office development that supports the existing mix of uses will be supported. Hackney Wick includes a mix of town centre uses alongside light industrial and residential uses. Development of light industrial uses that are compatible with the existing mix of uses will generally be supported.</p> <p>Neighbourhood Centres serve the day-to-day needs of a smaller catchment and are likely to be suitable for more localised office uses.</p>

Supporting text

15.12 This policy sets out the approach to employment provision in relation to the level and distribution of jobs across the borough over the period to 2038. This will help to ensure successful and sustainable local and sub-regional economies, promoting and facilitating a range of employment spaces to meet the needs of different types of occupiers across different locations (see Figure 16 and the Policies Map).

15.13 Part 1 describes how development should contribute to meeting our long-term objectives to support investment and job creation in the borough. Tower Hamlets has a diverse economy ranging from the globally significant financial centre of Canary Wharf and the associated services required to support it (and the neighbouring City of London) to creative and cultural industries, industrial uses, secondary offices, and businesses, meeting a very local need. Employment activities are distributed across the borough with specific locations supporting clusters of particular businesses or unit types. Development that contributes to meeting these objectives will be supported.

15.14 Development is expected to help reduce wealth and social inequality and support local enterprise, employment, education, and skills development and the council's social value aims. This is to support residents to take advantage of the opportunities created by development, both during the construction and end user phase.

15.15 Planning obligations will be used to ensure developments contribute to this aim, including by making financial contributions which will be used by the council to fund training and support for residents and local businesses to access employment and enterprise opportunities resulting from development. The approach to calculating these contributions is set out in Appendix 2. In addition, developments

are expected to work towards targets for local employment and enterprise which will be secured by planning obligation, including providing education and skills opportunities (including apprenticeships, internships, work placements and graduate placements) during construction and occupation, where appropriate.

15.16 Part 1 also supports the provision of a range of workspaces including affordable workspace, emphasising that spaces suitable for small-and-medium enterprises and microbusinesses are a vital element of the overall mix. This has the dual benefit of supporting new and emerging economic sectors and providing additional space for small-and-medium enterprises and micro-businesses that provide employment for a significant proportion of the borough's population.

15.17 Development incorporating a range of unit types and sizes will be encouraged, including where these are clustered within a single building and provide shared and networking facilities. Developments should address the most up-to-date requirements as part of pre-application discussions.

15.18 Part 2 establishes the designated employment locations. We will work with applicants 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.

15.19 Canary Wharf and the City Fringe contain a high proportion of primary and large floorplate offices which form part of globally significant employment clusters. The existing office space in these areas will be protected to ensure that these areas continue to play a globally significant role. However, there has been a reduction in the demand for large-floorplate corporate offices, and a shift, particularly in Canary Wharf, towards a greater mix of employment space – with a significant

emphasis on space suitable for local independent businesses – and a greater mix of uses more broadly on the fringes of Canary Wharf will be supported. This will be achieved through the designation of the CW POL, the Canary Wharf Fringe and the City Fringe POLs.

15.20 The CAZ, which includes the London Plan designated North Isle Of Dogs (NIOD) Satellite (including Canary Wharf) has been subdivided into four distinct areas. The commercial core of the NIOD has been designated as the CW POL and is unsuitable for housing, unless it is delivered through the retrofit of existing buildings in line with circular economy principles and does not undermine the supply of office space to meet the objectively assessed need as demonstrated in the council's Employment Land Review or other council-approved document, or other uses which would undermine the strategic functions of the CAZ. The area surrounding the CW POL has been designated as the CW Fringe. In this area a greater mix of uses is supported, including residential up to a maximum limit of 75% of the floor area of any new development. The 75% maximum may be considered strategically across multiple sites where appropriate. The CW Fringe is also expected to support the function of Canary Wharf as a Metropolitan Centre, with a diverse variety of town centre uses.

15.21 The City Fringe POL covers areas that are key existing or potential employment locations with offices and other strategic functions as the dominant land use. However, in contrast to the CW POL, residential uses will be acceptable so long as they do not undermine the future supply of offices and other strategic uses. This approach seeks to ensure residential development does not prejudice the future intensification of employment floorspace or undermine the predominant employment

function of these areas. While there has been a reduction in demand for large format office space across London, this reduction has been less acute in the City and City Fringe than in Canary Wharf. As a result, there continues to be a need to safeguard space for offices, including large-floorplate corporate style offices, in the City Fringe. This ensures that the larger businesses moving east from the City do not displace smaller businesses occupying the existing office stock in the west of the borough.

15.22 The remainder of the CAZ which is outside of the City Fringe POL contains a more diverse range of uses than the Secondary POL and includes the borough's three CAZ Centres, which function as town centres. Within this zone, proposals should consist of or provide a significant amount of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site. Other uses which may include residential will be encouraged where the residential component of a scheme does not exceed 75% of the gross internal floor area. This will ensure that the area retains its mixed-use character, and that smaller-scale office space continues to be provided that meets the needs of local independent businesses in highly accessible locations.

15.23 Tower Hamlets has a relatively limited supply of industrial land and floorspace, despite high levels of market demand, in the face of increasing competition from other land uses, such as housing. There are clusters of existing industrial activity along key transport routes. These sites need to be protected to support the long term needs of the borough and the role of the City of London and Canary Wharf as global economic hubs (some services need to be in close proximity to the end user and immediately available). This will be achieved through the

designation of the Strategic Industrial Locations (Empson Street and Fish Island/Bow Goodsyards) and Local Industrial Locations (see Part 1).

15.24 For the purposes of this chapter, industrial uses are considered to include:

- light and general industry (use Classes E(g)(iii) and B2);
- storage and logistics/distribution (use Class B8);
- secondary materials, waste management and aggregates (use Classes B2, B8 and Sui Generis);
- utilities infrastructure (such as energy and water);
- land for sustainable transport functions including intermodal freight interchanges, rail, and bus infrastructure;
- wholesale markets;
- emerging industrial-related sectors;
- flexible hybrid space to accommodate services that support the wider economy and population;
- Low-cost industrial and related space for micro, small and medium-sized enterprises; and
- research and development of industrial and related products or processes.

15.25 The borough's Local Mixed-use Employment Locations (LMELs) have relatively high public transport accessibility levels and support significant numbers of jobs but have unique individual characteristics. Applicants should aim to ensure that new employment space that is brought forward contributes to and meets the business and workspace demands of each area. The Whitechapel LMEL forms part of MedCity and plays a particularly important role in the development of the Life Sciences and Medical Research sector, with the Royal London Hospital,

a campus of Queen Mary University London, and the potential for a new life sciences research centre. The Blackwall LMEL is experiencing an increase in higher education facilities, benefitting from the campus-like feel of the area, its proximity to student housing and its good public transport connections. New development within LMELs will be expected to provide high-quality flexible workspace designed to meet the needs of emerging and growing sectors (e.g. research and development) as well as other SMEs and creative businesses.

15.26 Hackney Wick and Fish Island have been designated as a Creative Enterprise Zone in accordance with London Plan Policy HC5. Within this area, creative workspace and cultural venues are supported, and there is particular emphasis on the provision of affordable workspace to support creative industries. In addition, the HWFI CEZ includes a significant Warehouse Living community, which relies on low-cost, communal spaces that provide both living accommodation and workspace. Warehouse Living provides both housing and employment and is therefore considered to be both a residential and an employment use.

15.27 In addition to the SILs and LILs, the borough's railway arches play an important role in providing relatively low-cost space for a very wide variety of uses including light industrial. These spaces will be protected through a railway arches designation that secures them for employment and other creative uses. The borough's railway arches also contain and can be suitable for community and cultural uses, such as sports facilities and art galleries. Where railway arches are in an existing community use, or a community facility is proposed within a railway arch, regard should be had to the Community Infrastructure policies.

15.28 Part 2 also highlights that town centres are locations in which employment uses will be supported, subject to the provision of active frontages at ground floor level, where relevant. This is because town

centres are located throughout the borough and are able to offer smaller spaces which meet the needs of businesses serving the local community. Within the Tower Hamlets Activity Areas and some District Centres and Neighbourhood Centres (as shown on the Policies Map), purpose-built office buildings can be supported where they are of a nature and scale which corresponds with their surroundings. Within the Primary and Secondary Frontages, employment spaces should be located on upper floors so as not to undermine the retail and leisure functions of those areas.

15.29 Proposals outside of designated employment locations and the town centre hierarchy (see Part 1) will be supported where they demonstrate that there is a need and demand for such employment uses, with further detail set out in Policy EG2.

London Plan policies:

- GG5 Growing a good economy
- SD4 The Central Activities Zone (CAZ)
- SD5 Offices, other strategic functions and residential development in the CAZ
- E1 Offices
- E2 Providing suitable business space
- E3 Affordable workspace
- E4 Land for industrial, logistics and services to support London's economic function
- E5 Strategic Industrial Locations (SIL)
- E6 Locally Significant Industrial Sites
- E7 Industrial intensification, co-location and substitution
- E8 Sector growth opportunities and clusters
- E11 Skills and opportunities for all

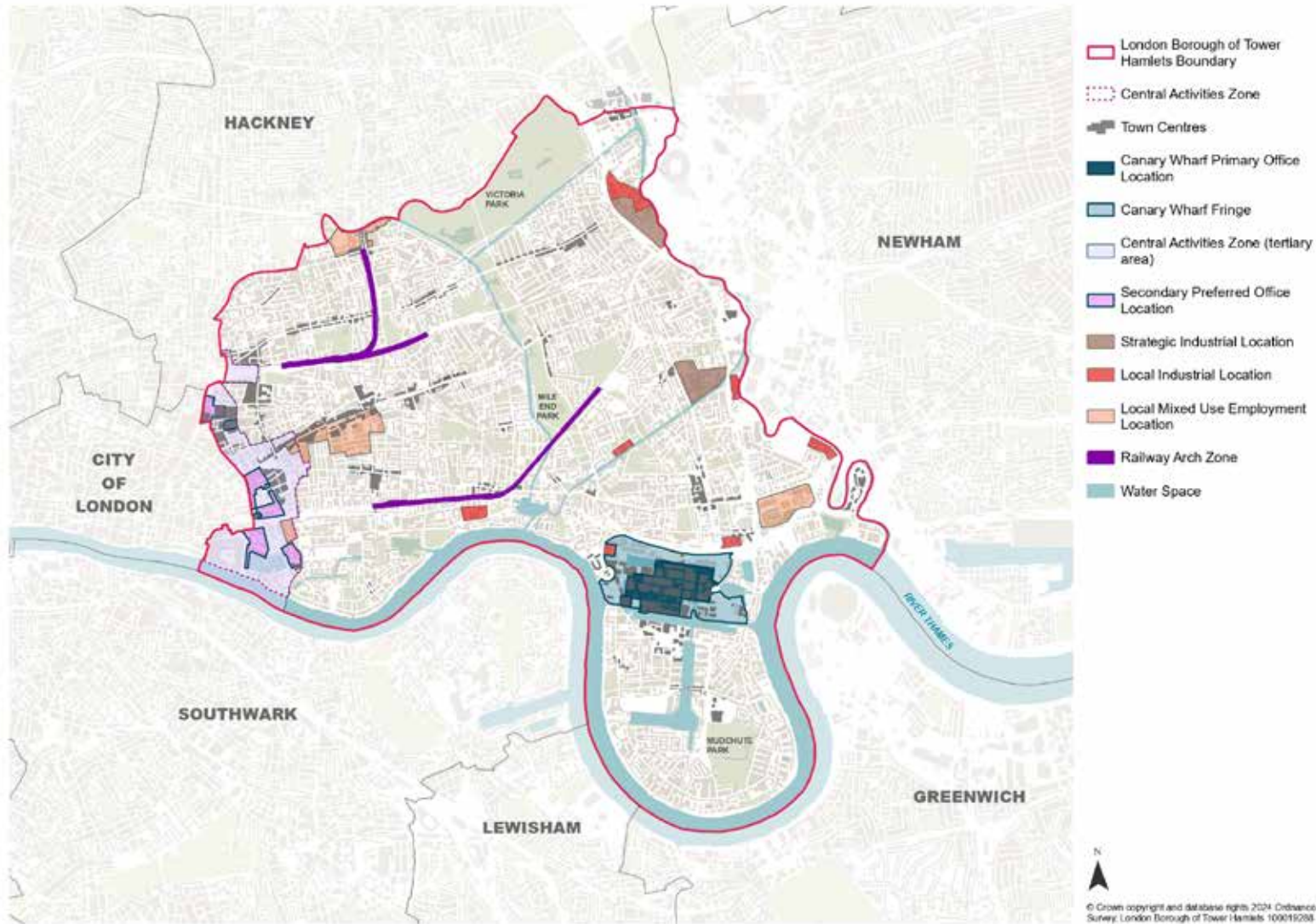
Local Plan policies:

- DV1 Areas of growth and opportunity within Tower Hamlets
- DV2 Delivering sustainable growth in Tower Hamlets
- CI5 Arts and culture facilities
- RW1 Managing our waste
- RW2 New and enhanced waste facilities
- MC1 Sustainable travel
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Tower Hamlets Employment Land Review, 2023
- Tower Hamlets Affordable Workspace Study, 2023
- Central Activities Zone SPG, 2016
- London Industrial Land Supply, 2023
- London Office Policy Review, 2017
- Central Activities Zone Economic Futures Research, 2021

Figure 16: Distribution of employment hubs and locations



Policy EG2 New employment space

1. Development proposals for new or intensified industrial floorspace (use classes E(g)(ii), E(g)(iii), B2, B8 and industrial Sui Generis uses) will be supported in Strategic Industrial Locations, Local Industrial Locations, Railway Arches, Site Allocations which include industrial space and the Creative Enterprise Zone (where they support the creative economy). Additionally, development proposals for new or intensified light industrial floorspace (use classes E(g)(ii) and E(g)(iii)) will also be supported in Local Mixed-use Employment Locations. Development proposals for Warehouse Living (Sui generis) floorspace will be supported in the Creative Enterprise Zone.

2. Development proposals for new or intensified office floorspace (use classes E(g)(i) and E(g)(ii)) will be supported in Preferred Office Locations, Local Mixed-use Employment Locations, the Central Activities Zone, Site Allocations which include office space and the Creative Enterprise Zone (where they support the creative economy).

3. Outside of the locations cited in Parts 1 and 2, development proposals for new employment space will be directed to town centres, having regard to the town centre hierarchy and the London Plan's Town Centre Office Growth Potential Classifications, the Tower Hamlets Activity Areas and locations with good public transport accessibility or along major transport routes.

4. Development proposals for new employment space will be supported at other locations to those specified in Parts 1-3 above where it can be demonstrated that there is a reasonable prospect of occupancy by way of a detailed marketing strategy, and:

- a. the employment use would contribute towards integrated place

making; or

- b. the area forms part of a cluster of similar employment uses; or
- c. the employment space is being provided as part of a temporary meanwhile use.

5. Development proposals for new employment space must ensure that it does not have a negative impact on the amenity of neighbouring residential dwellings or the operations of neighbouring businesses.

6. Planning conditions may be used to secure Classes E(g)(i), E(g)(ii), and/or E(g)(iii) within designated employment locations or on sites where other Class E uses would not be appropriate.

7. Development proposals for new employment space must demonstrate that:

- a. Where relevant, floorspace will allow for flexibility for a range of occupiers including future subdivision or amalgamation;
- b. Where relevant, they will provide a range of unit types and sizes including a significant proportion of micro- and small units well-suited to micro- and small independent businesses;
- c. they will provide a good level of amenity for occupiers;
- d. they will provide adequate servicing and delivery accommodation; and
- e. they incorporate the highest standards of inclusive design.

8. Development proposals for employment and residential use in the same self-contained unit (i.e. live-work and work-live) will not be supported, except in the form of Warehouse Living (Sui generis) in the Hackney Wick and Fish Island Creative Enterprise Zone.

Supporting text

15.30 Parts 1 and 2 of the policy encourage the provision of additional employment floorspace to meet demand and the needs of different business types. Where new provision is proposed, it must be located in the most viable locations to support the role and function of the borough's designated employment locations and to proactively avoid long-term vacancy or subsequent conversion to other uses. This policy seeks to direct new provision to the designated employment locations, activity areas and site allocations which include employment space as a first priority, then to locations of highest activity, accessibility and visibility (see Part 3) and finally to other locations (see Part 4) where it meets specific criteria.

15.31 Part 4 supports the development of employment uses outside of designated employment locations, provided they meet certain criteria. Part 4(a) supports employment uses where they serve a place-making function within a development, for example by activating inactive spaces or providing a focal point. Part 4(b) recognises that there are areas of the borough outside of designated employment locations that contain clusters of employment uses, and that these areas are likely to be suitable for new employment uses. Part 4(c) recognises the positive role that temporary uses can play in activating and making efficient use of spaces while they await development. In order to allow for flexibility and ensure that temporary uses can occupy spaces quickly, the policy allows flexibility for temporary employment uses to occupy spaces that might otherwise be considered unsuitable for employment uses, provided these uses do not have a detrimental impact on neighbouring amenity through, for example, noise or air pollution. Meanwhile uses would be expected to only remain in place for a defined period of time,

or until the site comes forward for development to meet its full potential or allocated use(s). Proposals for meanwhile uses should include a 'move-on' plan showing how the temporary use will move to a new suitable premise when a permanent occupier takes on the space or it is redeveloped. Where the application can demonstrate that the use is genuinely temporary in nature – meaning that there will be no loss of employment when the use ceases – a 'move on' plan may not be necessary.

15.32 Part 5 seeks to ensure that new employment development does not have a negative impact on the amenity of neighbouring residential dwellings, including as a result of noise, air and light pollution, odours, vibration or reduction in daylight, sunlight or privacy. It is also essential that new employment development does not undermine the operations of existing businesses, including ensuring that full access, operations, and servicing are maintained. Where existing businesses in close proximity to the development site have the potential to cause noise, pollution, or vibration issues, the proposed development must ensure that it is designed to mitigate these issues, in accordance with the London Plan's Agent of Change principle.

15.33 Part 6 recognises that designated employment locations play an important role in ensuring a future supply of land and floorspace to meet the borough's economic needs over the course of the plan period. The flexibility of use class E risks undermining that supply, so the policy supports the use of planning conditions that restrict changes of use.

15.34 Part 7 aims to prevent long-term vacancy caused by high fit-out costs and lack of supporting infrastructure deterring interest from potential tenants.

15.35 Part 7(a) promotes flexibility to minimise the risk of spaces becoming vacant and ensuring that they can adapt to changing market demands.

15.36 Part 7(b) seeks to ensure that space is provided to meet the needs of local independent businesses, which may require smaller spaces.

15.37 Part 7 (a) and (b) also recognise that flexibility may not be possible or desirable in all cases. Development proposals that are designed for a specific operator or a specific industrial use may not be able to provide flexibility or smaller units. Site constraints may also limit the ability of a development proposal to meet these criteria.

15.38 Part 7(c) promotes a working environment that supports the health and well-being of occupants. Development proposals should demonstrate that they include adequate levels of daylight and sunlight and access to ancillary communal facilities for smaller occupiers such as meeting rooms, breakout spaces, and kitchen facilities.

15.39 Part 7(d) seeks to ensure that the delivery and servicing needs of the occupiers can be met within the proposed development.

15.40 Development proposals should include off-street loading where necessary, and demonstrate that they can meet the needs of a range of occupiers and have sufficient clear ceiling heights and goods lifts and can handle heavy loads.

15.41 Part 7(c) requires developments to be designed to be inclusive for occupiers with mobility constraints, including ensuring that all workspaces are accessible to those with mobility constraints, sufficient Blue Badge parking is provided to meet the requirements of London Plan Policy T6.5, and ensuring that there are no potential conflicts

between the Blue Badge parking and the servicing and delivery accommodation.

15.42 In the case of office developments, high-speed broadband connectivity should be provided to serve the end-user. Industrial units would be expected to provide double-height units with appropriate access and good standards of internal sound insulation to minimise conflict with surrounding uses.

15.43 Part 8 recognises that, in most parts of the borough, live-work units do not contribute to the overall provision of employment floorspace and are difficult to enforce. Applications to convert live-work units into purely residential units and certificates of lawful development (where the units have not been used for employment purposes) demonstrate a lack of need to secure live-work or work-live within the same self-contained unit. Applications for live-work will not be supported outside of the Hackney Wick and Fish Island Creative Enterprise Zone. Instead, the council supports development proposals that offer a range of uses (including employment and housing) as separate units within the same site. There is an existing cluster of Warehouse Living in the Hackney Wick Fish Island Creative Enterprise Zone that provides low-cost work space alongside housing. This cluster plays an important role in the borough's creative economy and will be preserved.

London Plan policies:

- SD5 Offices, other strategic functions and residential development in the CAZ
- SD6 Town centres and high streets
- SD7 Town centres: development principles and Development Plan Documents
- E1 Offices
- E2 Providing suitable business space
- E4 Land for industry, logistics and services to support London's economic function

Local Plan policies:

- LC1 Supporting the network and hierarchy of centres
- MC1 Sustainable travel

Evidence base:

- Tower Hamlets Employment Land Review, 2023

Policy EG3 Affordable workspace

1. Development proposals that include more than 1,000sqm gross commercial floorspace (use Class B2, B8, E(a), E(b), E(c), E(g) and commercial Sui Generis uses) should provide at least 15% of the commercial floorspace at a peppercorn rent and in perpetuity.
2. Development proposals that will result in affordable workspace of 300sqm or more will lease the space directly to the council (or an organisation approved by the council).
3. Development proposals that will result in affordable workspace of less than 300sqm are required to lease the space either to an affordable workspace operator directly or to an end occupier(s). Development proposals must provide an affordable workspace strategy, which sets out their approach to allocating and marketing the subsidised space.
4. Affordable workspace should be designed and fitted out to the current, local industry requirements.
5. The affordable workspace will have an affordable service charge that is no more than 50% of a fair and reasonable proportion of the costs associated with the space.
6. In exceptional circumstances, an affordable workspace financial contribution may be accepted in lieu of on-site affordable workspace provision, where it can be demonstrated that on-site provision is not feasible and/or that a greater economic impact would be achieved through this route.
7. Where a single applicant intends to develop multiple sites within an area, the council may take a strategic approach, considering the requirements for multiple sites collectively.

Supporting text

15.44 LBTH's Employment Land Review (2023) and Affordable Workspace Study (2023) identify a gap in the affordability of commercial space within the borough for many types of businesses. In accordance with the London Plan, affordable commercial space is intended to support: (1) specific sectors that have social value such as charities, voluntary and community organisations or social enterprises; (2) specific sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace; (3) disadvantaged groups starting up in any sector; (4) educational outcomes through connections to schools, colleges or higher education; and (5) start-up and early stage businesses or regeneration.

15.45 Increasing rents and sales costs in Tower Hamlets are making commercial space increasingly unaffordable for the types of businesses and organisations listed above. For this reason, Policy EG3 requires the provision of affordable commercial space in all developments that provide 1,000sqm or more of gross commercial floorspace. Where a development proposal is below this threshold, the council is open to working with developers to secure affordable workspace, particularly in cases where it is necessary to offset harm in relation to another policy.

15.46 In the Strategic Plan 2022-26, the council commits to adopt a community wealth building approach – socially just use of land is a key principle of community wealth building and affordable workspace policy can be used as a mechanism to maximise wider social, economic and community benefits through assets in the borough.

15.47 Given the varied needs and diverse economy of the borough, different types of affordable commercial space will be sought depending on the nature of the development, the need for specific

types of space, and the surrounding context. The types of spaces that may be sought could include:

- Ground floor retail or other public-facing commercial space;
- Arts and cultural facilities;
- Light industrial/maker space;
- Arts production spaces, including artists' studios, performance rehearsal spaces, set design workshops;
- Heavy industry/manufacturing;
- Logistics facilities and last-mile distribution hubs;
- Life science and other laboratory space;
- Traditional office space;
- flexible/shared workspace; and
- serviced office space.

15.48 Developers should engage early in the planning process with LBTH planning officers and the council's economic development team to ensure that the proposed affordable commercial space supports the sectors with the greatest need. In town centre locations, this may include ground floor retail/café/restaurant space or space for arts and cultural facilities; in industrial locations this may include light industrial/maker spaces or space for logistics and last-mile distribution. Depending on the location of the site and the needs of that particular area, it may be appropriate to provide a mixture of different types of affordable commercial workspace.

15.49 In the case of applications for minor material amendments that include a change in the amount of commercial floorspace in a development, this policy should be applied to the overall commercial floorspace of the development as a whole, not just to the uplift.



15.50 In order to ensure stability and continuous provision for the relevant affordable commercial space operators and occupiers, Part 1 of the policy expects the space to be provided for the full lifetime of the development, and this will be secured through a S.106 agreement. Where a development proposes the provision of affordable commercial space for a shorter period, the proposal will need to provide robust viability testing to demonstrate that the period proposed is the longest viable period of time that the space can be provided. In no case will a period of less than 20 years be accepted, to ensure certainty for both the operators and the end users, and to allow the space to support multiple businesses from start-up to move-on.

15.51 In accordance with part 2, development proposals that include 300sqm or more of affordable workspace are required to offer the headlease to the council at peppercorn rent. An operator will be appointed to manage these spaces, provide 'affordable' memberships and deliver wider social value objectives. Having ownership of spaces gives the council more autonomy over what will be delivered, ensuring that affordable workspace supports the council's strategic priorities.

15.52 In accordance with Part 3, for provisions less than 300sqm, the developer is required to lease the space to either an affordable workspace operator(s) or directly to an occupier(s). The developer must provide an affordable workspace strategy, which considers:

- the allocation policy – including the criteria for selecting tenants and a 'graduation' approach as their business grows to become self sufficient;
- the approach to marketing and promoting the space – the council can nominate suitable operators or occupiers for consideration;
- how they intend to prioritise the subsidised space to support aspiring entrepreneurs, start-ups and/or local independent businesses most in need of space;
- how they intend to prioritise the subsidised space to support businesses that can provide specific social, cultural and/or economic development outcomes; and
- wider social value objectives that could be created through the provision of the affordable workspace.

15.53 Given the complexity of the provision of affordable commercial space, applicants are expected to engage with the council as early in the process as possible. The council's economic development team can support the applicant with identifying a suitable affordable workspace operator or occupier(s).

15.54 The design and fit-out of affordable commercial space are key considerations in its suitability for the end-users. Part 4 of the policy seeks to ensure that all affordable workspace is designed and fitted out to a minimum level that is usable by any end user to ensure that the final occupiers or operators are not responsible for large fit-out costs that then significantly reduce the affordability of the space.

15.55 Development proposals for affordable workspace are expected to meet the following standards:

- development proposals should accommodate with regular plan and flexibility for either open-plan or more compartmentalised modes of occupation;
- all internal walls to be plastered and painted;
- all soffits and structural columns to be exposed fair-faced polished concrete or plastered and painted;
- where thermal/acoustic insulation is applied to soffits, finish suitable for decoration;
- installation of mechanical and electrical services – including ventilation, heating and basic fire detection systems;
- installation of toilets and a kitchenette(s);
- power supply outlets and data cabling points – provision should assume a demand based on maximum possible occupancy;

- raised floors and boxes – floors should have a minimum 5kN loading capacity (4+1kN);
- floor coverings – carpet tiles deemed the most suitable though it may differ depending on typologies (i.e. light industrial or artist studios);
- floor-to-ceiling height to be as generous as possible, with a minimum floor-to-ceiling height of 3m - 3.8m depending on the layout and use of the space;
- the workspace to comply with all relevant accessibility regulations – including disabled toilets/parking, bicycle storage and arrangements for loading/unloading;
- the entrance must be secure and should not be separated to the main entrance(s) of the development (i.e. a fire exit or back door);
- adequate levels of sunlight/daylight – there is a reluctance to accept a basement or lower ground provision without sufficient access to natural light; and
- other amenities – the affordable workspace should benefit from any other amenities provided within the building (i.e. provision of showers, reception facilities, informal breakout areas, outdoor space and on-site childcare).

15.56 In exceptional circumstances, some variation from the minimum requirements in part 4 may be acceptable where the space is designed for a specific occupier and that occupier has requested a different level of fit out.

15.57 The Hackney Wick and Fish Island Creative Enterprise Zone plays an essential in providing workspace for arts and culture-producing

organisations. In order to ensure that the provision of affordable workspace supports this role, space in this part of the borough should be designed to meet the needs of creative businesses.

15.58 Part 5 recognises that high service charges can be an impediment to the take up of affordable workspace by operators and tenants. The overall service charge should reflect only what the affordable workspace tenants have access to and should not include unnecessary additional amenities or overly expensive facilities. The service charge paid by the affordable workspace tenants will be capped at 50% of their reasonable proportion of the overall workspace service charge, including any costs associated with the entrance and internal common parts of the building which the space has rights to. Development proposals should ensure that fit-out of the affordable workspace allows for easy and inexpensive maintenance where possible.

15.59 Part 6 of the policy recognises that there may be exceptional circumstances where a final contribution is more appropriate in lieu of on-site affordable workspace. Examples include (subject to evidence and ultimately at the council's discretion):

- if the developer sufficiently demonstrates they cannot viably provide policy compliant affordable workspace;
- in circumstances where the developer (or council) is unable to let the space after the marketing period (18-24 months) and it can be demonstrated greater economic impact can be achieved through a contribution;
- in exceptional circumstances where the developer (or council) is unable to let the space due to a significant economic shock; and

- affordable workspace contributions will be used to support the development of affordable workspace across the borough.

15.60 Part 7 recognises that, in some circumstances, it may not be viable for development proposals to meet the full affordable workspace requirement. In these cases, development proposals should demonstrate through viability evidence that they are providing the maximum viable amount of affordable workspace. In these cases, the council may apply flexibility on other elements of this policy, including rent, where it would result in a greater proportion of affordable workspace.

15.61 Part 8 recognizes that there may be circumstances in which a strategic approach that considers multiple sites collectively can deliver a better outcome in terms of the quality and function of the affordable workspace, for example, where multiple proposed developments are coming forward concurrently and in close proximity, their affordable workspace obligations can be pooled to deliver a single larger affordable workspace that can achieve greater operating efficiency and better serve occupiers.

London Plan policies:

- E2 Providing suitable business space
- E3 Affordable workspace
- HC5 Supporting London's culture and creative industries

Local Plan policies:

- DV5 Developer contributions
- TC1 Supporting the network and hierarchy of centres
- CI5 Arts and culture facilities

Evidence base:

- Tower Hamlets Employment Land Review 2023
- Tower Hamlets Affordable Workspace Study 2023
- London Office Policy Review 2017
- Affordable Workspace Evidence Base 2018

Policy EG4 Loss and redevelopment of employment space

1. Development proposals resulting in a net loss of industrial floorspace (use classes E(g)(ii), E(g)(iii), B2, B8 and industrial Sui Generis uses) within Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs) will not be supported. Development proposals resulting in a net loss of Warehouse Living (Sui generis) floorspace within the Creative Enterprise Zone will not be supported.
2. Development proposals resulting in a net loss of employment floorspace within the Canary Wharf Preferred Office Location (CW POL) and the Canary Wharf Fringe (CW Fringe) will be supported where the proposal is for an alternative Strategic CAZ function, it can be demonstrated that the loss will not undermine the ability of the borough to meet its objectively assessed need for office floorspace and:
 - a. active marketing has been carried out over a continuous period of at least 12 months at a reasonable market rent which accords with indicative figures, or
 - b. in exceptional circumstances, provide robust demonstration that the site is unsuitable for continued employment use due to its condition, reasonable options for restoring the site to employment use are unviable, and that benefits of alternative use would outweigh the harm of loss of employment floorspace.
3. Development proposals resulting in a net loss of employment floorspace in the City Fringe POL and the rest of the CAZ will be supported where the proposal is for alternative Strategic CAZ functions and it can be demonstrated that all reasonable efforts have been

taken to preserve the space in employment use, including evidence of appropriate maintenance and upkeep and efforts to increase the flexibility of the space for employment uses and:

- a. active marketing has been carried out over a continuous period of at least 12 months at a reasonable market rent which accords with indicative figures; or
 - b. in exceptional circumstances, provide robust demonstration that the site is unsuitable for continued employment use due to its condition, reasonable options for restoring the site to employment use are unviable, and that the benefits of alternative use would outweigh the harm of loss of employment floorspace.
4. Development proposals resulting in a net loss of employment floorspace within the Canary Wharf Fringe, City Fringe POL and rest of the CAZ where the proposal is for a use other than a Strategic CAZ function will be supported where it can be demonstrated that the loss will not undermine the ability of the borough to meet its objectively assessed need for office floorspace, all reasonable efforts have been taken to preserve the space in employment use or alternative Strategic CAZ functions, including evidence of appropriate maintenance and upkeep and efforts to increase the flexibility of the space for Strategic CAZ functions and:
 - a. active marketing has been carried out over a continuous period of 24 months, the first 12 months in accordance with part 3, and the following 12 months for office space and alternative Strategic CAZ functions; or
 - b. in exceptional circumstances, provide robust demonstration

that the site is unsuitable for continued use in an employment use or an alternative Strategic CAZ function due to its condition, reasonable options for restoring the site to employment use or alternative Strategic CAZ functions are unviable, and that the benefits of proposed development would outweigh the benefits of an employment use or other Strategic CAZ functions.

5. 5. Development proposals in LMELs and non-designated locations that would result in a net loss of employment floorspace will be supported where it can be demonstrated that all reasonable efforts have been taken to preserve the space in employment use, including evidence of appropriate maintenance and upkeep and efforts to increase the flexibility of the space for employment uses, and:

- a. the site has been actively marketed for its existing use, alternative employment uses, and alternative community uses such as education uses for a continuous period of at least 12 months at a reasonable market rent which accords with indicative figures; or
- b. In exceptional circumstances, the site is unsuitable for any commercial or community use due to its condition; reasonable options for restoring the site to commercial or community use are unviable; and that the benefits of a residential use would outweigh the benefits of employment, commercial or community use.

6. Development proposals that involve the redevelopment of existing occupied workspace, even where there is no net loss of employment floorspace, will not be supported unless:

- a. the workspace is provided with equivalent layout, fit-out and rent levels based on that which has been lost and existing tenants are given the right of first refusal for the re-provided space; and proposals provide a decanting plan to ensure that the businesses can continue to operate during the construction phase, including finding suitable temporary accommodation, at equivalent rents, within the borough unless it can be shown that the needs of the business are better met elsewhere; or
- b. the development proposal identifies alternative space with a size, layout, rent and connectivity equivalent to the existing that is available and considered suitable by the occupier. The alternative space should be located within the borough unless it can be shown that the needs of the business are better met elsewhere.

Supporting text

15.62 This policy describes the criteria that will be used to assess the potential loss of employment space within the borough in line with the vision and objectives of the plan (see Section 2).

15.63 In accordance with Part 1, any development proposals that would result in a net loss of employment floorspace within a SIL or a LIL will not be supported. This reflects the significant level of demand for industrial floorspace in the borough and the important role it plays in providing employment and entrepreneurial opportunities to local residents.

15.64 In addition, Part 1 recognises the important role that the Warehouse Living community in Hackney Wick and Fish Island plays in providing low-cost living and working spaces to those in creative and other industries. Given the decline of this community in recent years and its importance to the creative economy, this space will be protected and proposals that include a net loss will not be supported.

15.65 Part 2 recognises that changes in demand for office floorspace in the borough may allow for a net loss of office floorspace within the Canary Wharf POL where this can be justified in relation to the borough's objectively assessed need for office space. The objectively assessed need for office floorspace comprises two elements, the existing stock of office floorspace (both occupied and vacant) and need for new office floorspace projected by the Employment Land Review (2023) for the plan period. Within the Canary Wharf POL and Fringe, the existing stock is estimated at 1.5m sqm. The projected need within the Canary Wharf POL and Fringe is calculated by taking 86% of the borough-wide projection to reflect that 86% of the office pipeline is located in Canary Wharf, then adding a buffer of 33% to reflect the lack of certainty in the

final 5 years of the 15 year plan period. This amounts to a projected need for 243,380sqm of office floorspace during the plan period, and means that development should not result in existing and pipeline office space falling below 1.75m sqm within the Canary Wharf POL and Fringe.

15.66 Part 3 recognises that there may be opportunities within the Canary Wharf Fringe, City Fringe POLs and other parts of the CAZ to deliver alternative Strategic CAZ functions where a loss of employment floorspace can be justified. For the purposes of parts 3 and 4 of the policy, alternative CAZ strategic functions include:

- functions associated with the State, Government and Monarchy;
- diplomatic organisations (such as embassies and high commissions);
- uses connected with science, technology, media, communications and cultural sectors of regional, national and international importance;
- centres of excellence for higher and further education and research;
- centres of medical excellence and associated specialist facilities;
- legal establishments of regional, national and international importance;
- arts, culture, leisure and entertainment activities and areas of regional, national and international importance;
- retailing, including specialist outlets, of regional, national and international importance; and
- specialist creative clusters including for example clothing, fashion, jewellery, printing, antiques, musical instruments, art, and culture.

15.67 Tourism facilities including hotels and conference centres are considered an alternative Strategic CAZ Function only in the Canary Wharf POL and the Canary Wharf Fringe. This is on the basis that

allowing for the loss of office floorspace in the City Fringe to allow for hotel development risks resulting in an oversupply of hotels and an uncoordinated and piecemeal loss of office space.

15.68 Parts 3-5 require marketing evidence covering a continuous period of at least 12 months (or 24 months in the case of Part 4) in order to prevent unnecessary loss of existing employment space which would put pressure on the ability of the borough to meet projected need, and to ensure that temporary or seasonal changes to the economy do not result in a longer term loss of office floorspace. In order to demonstrate that the site has been marketed for a continuous period of 12 months, applicants must submit a marketing report showing all methods used to market the space (including active hyperlinks to websites where the space has been marketed). The report should demonstrate that the asking rent has been at a realistic rate for the type, size, and condition of the space. Such information should accord with our indicative guidance which is regularly updated. It would be expected that the property or site has been actively marketed, including appearing on local and national commercial property websites and visible display boards being displayed at the site. Applicants are also expected to engage with the council's employment and economic development team to ensure that the property or site is marketed via the relevant council channels. The report should detail the level of interest in the property over the 12-month (or 24-month) period, details of any viewings and offers, and details of why any interest had not been taken forward. Where the application pertains only to part of a building or office complex, the marketing report should show what floorspace the application pertains to.

15.69 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 report on the history and condition of the property to justify why marketing evidence should not be required and how and why re-providing employment space as part of redevelopment would not be viable. It should be demonstrated that the proposed development would not prejudice wider land-use objectives or the delivery of site allocations, and that reverse-sensitivity issues would not arise through conflict with surrounding existing uses, particularly where it lies within a cluster of other employment uses. The report should also demonstrate that the benefits of an alternative use would outweigh the benefits of the employment use to meet other local plan objectives, such as the need for complementary town centre uses or to maintain active frontages within town centres.

15.70 Part 5 recognises that LMELs play a particularly important role in supplying workspace for local independent businesses, start-ups, and emerging industries, often at a lower cost than in POLs. Given the challenges of forecasting demand for space to support smaller businesses and emerging industries, it is essential to ensure that there is a pipeline of workspace that supports these businesses. Education uses can operate synergistically alongside local independent businesses, start-ups and emerging industries, providing academic expertise and a supply of graduates, as well as incubator spaces and other shared facilities. Therefore, education uses will be prioritised where it can be demonstrated that there is no demand for employment uses within LMELs. Where the site is also within a town centre, other main town centre uses will also be prioritised where they accord with the town centre policies. Applications for residential use in these locations will need to demonstrate that there is no demand for any employment or education uses (or, where located in a town centre, main town centre uses).

15.71 Part 6 seeks to ensure that the disruptions to businesses from the redevelopment of employment space are minimised, even where the proposal does not result in any net loss of employment floorspace. Given the relatively low cost of much of the borough's existing workspace, and the higher cost of new-build floorspace, the redevelopment of existing, occupied employment space can risk displacing established businesses, or even rendering them unviable where they serve a local customer base and cannot move to lower-cost areas. In order to minimise the disruption to established businesses, redevelopment of employment space will be required to re-provide the existing floorspace to an equivalent fit-out, with an equivalent layout and at equivalent rents. Proposals for redevelopment are also required to provide a decant plan, showing that suitable equivalent workspace that meets the needs of the existing businesses at rents equivalent to their existing rents are available in the borough, or elsewhere where this can better meet the needs of the business, to accommodate the businesses during the construction phase of the development.

London Plan policies:

- SD4 The Central Activities Zone (CAZ)
- SD5 Office, other strategic functions and residential development in the CAZ
- E1 Offices
- E2 Providing suitable business space
- E4 Land for industry, logistics and services to support London's economic function
- E5 Strategic Industrial Locations (SIL)
- E6 Locally Significant Industrial Sites
- E7 Industrial intensification, co-location and substitution
- E8 Sector growth opportunities and clusters

Local Plan policies:

- C11 Supporting community facilities
- C13 New and enhanced community facilities
- C15 Arts and culture facilities

Evidence base:

- Tower Hamlets Employment Land Review, 2023
- Central Activities Zone SPG, 2016
- London Office Policy Review, 2017
- Central Activities Zone Economic Future Research, 2021

Policy EG5 Railway arches

1. Development proposals involving railway arches will be supported where:
 - a. The principal use is for an appropriate commercial, industrial, community, cultural or similar Sui Generis use; or
 - b. An operational use associated with the railway or public highway; and
 - c. The use will not cause harm to the environment and amenity of neighbouring uses and properties.
2. Development proposals resulting in a net loss of industrial uses (use Classes E(g)(iii) and B) in railway arches will not be supported unless it can be demonstrated that:
 - a. active marketing has been carried out over a continuous period of at least 12 months at a reasonable market rent which accords with indicative figures; or
 - b. in exceptional circumstances, provide robust demonstration that the site is unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use; and
 - c. all reasonable efforts have been taken to preserve the space in employment use, including evidence of appropriate maintenance and upkeep and efforts to increase the flexibility of the space for employment uses.

3. Development proposals connecting through arches must investigate opportunities to improve accessibility by walking and cycling, where feasible and appropriate.
4. Development proposals for development on sites that include, or are adjacent to railway arches must ensure that access into the arches is retained and that the proposal does not have a detrimental impact on the ability of occupiers to use the arches for appropriate uses.
5. Development proposals involving railway arches must demonstrate that they will not have an adverse impact on the public highway and railway network or preclude the delivery of planned transport infrastructure.

Supporting text

15.72 The Tower Hamlets Employment Land Review (2023) and the Affordable Workspace Study (2023) acknowledge the important role played by railway arches in providing low-cost workspace to a range of occupiers. Given the shortfall of available industrial land in the borough to meet the demand, it is essential to preserve spaces that can support industrial uses even where they fall outside of SIL and LSIS designations.

15.73 Part 1 of the policy seeks to retain railway arches in uses that make a positive contribution to the economy, culture, and community of Tower Hamlets. Railway arches in the borough contain a wide variety of uses, including light and heavy industry, food and drink production, arts, and culture and public-facing town centre uses. Given the variety of these uses, other policies may also be relevant; for example, proposals for 'dark kitchens', where there are regular food delivery pick-ups must have regard to Policy TC5; proposals for an arts and culture facility, or where there is an existing arts and culture facility, must have regard to Policy C5; proposals for public-facing town centre uses must have regard to the town centre policies.

15.74 Part 2 requires evidence covering a continuous period of at least 12 months in order to prevent unnecessary loss of existing industrial space which would put pressure on the ability of the borough to meet projected need. In order to demonstrate that the site has been marketed for a continuous period of 12 months, applicants must submit a marketing report showing all methods used to market the space (including active hyperlinks to websites where the space has been marketed). The report should demonstrate that the asking rent has been at a realistic rate for the type, size, and condition of the space. Such information should accord with our indicative guidance which is regularly updated. It would be expected that the property or site has been



actively marketed, including appearing on local and national commercial property websites and visible display boards being displayed at the site. Applicants are also expected to engage with the council's employment and economic development team to ensure that the property or site is marketed via the relevant council channels. The report should detail the level of interest in the property over the 12-month period, details of any viewings and offers, and details of why any interest had not been taken forward.

15.75 There may be cases where a net loss of industrial floorspace in railway arches, by virtue of their location, can support other policy objectives. For example, where a railway arch fronts onto a primary

or secondary shopping frontage in a town centre location, a public-facing main town centre use may better support the vitality and viability of the town centre. These will be assessed on a case-by-case basis, and a strategic approach may be supported where an applicant can demonstrate that they are bringing a comparable amount of railway arch floorspace into industrial use elsewhere.

15.76 Part 3 seeks to ensure that railway arches make a positive contribution to the connectivity and public realm of the local area.

15.77 Part 4 recognises that, given the nature of the uses within railway arches, they often have specialised or complicated access arrangements, including the need for 24/7 access and access for larger vehicles and equipment. It is essential that new development does not undermine that access or more broadly the ability of the occupiers to operate.

15.78 Part 5 seeks to ensure that development involving railway arches does not prejudice the delivery of any planned transport infrastructure. This reflects the fact that railway arches form part of the existing transport infrastructure and are often the primary locations for the development of new or enhanced transport infrastructure. The development of this infrastructure may require special access arrangements within and around the railway arches. Therefore, early engagement with Network Rail, TfL and/or the Highways Authority will be essential to any proposals involving railway arches.

London Plan policies:

- E2 Providing suitable business space
- E4 Land for industry, logistics and services to support London's economic function
- E7 Industrial intensification, co-location and substitution

Local Plan policies:

- PS4 Attractive streets, space, and public realm
- MC3 Impacts on the transport network
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Tower Hamlets Employment Land Review, 2023
- Tower Hamlets Affordable Workspace Study, 2023

Policy EG6: Data centres

1. Development proposals for data centres in Local Industrial Locations and Local Mixed-use Employment Locations will be supported where they:
 - a. do not undermine the supply of land or floorspace for employment uses, including office and industrial uses;
 - b. demonstrate that there is a need or demand for the facility in the proposed location;
 - c. can demonstrate that there is sufficient electrical capacity in the local area to power the facility without placing a limit on other types of development in the area;
 - d. provide affordable workspace in accordance with Policy EG3;
 - e. can demonstrate that any negative amenity impacts on neighbouring residential uses;
 - f. provide a design that enhances adjacent public realm and supports or enhances the character of the area; and
 - g. demonstrate that efforts have been made to ensure that the waste heat generated by the facility will be reused or supplied to a local heat network.
2. Development proposals for data centres outside of locations listed in Part 1 will not be supported.

Supporting text

15.79 Data centres play an important role in ensuring that there is sufficient broadband capacity to serve the residents, businesses and educational institutions in the borough. They also provide data storage capacity for businesses, making Tower Hamlets an attractive location for businesses with substantial data needs.

15.80 Data centres are generally considered to fall into use Class B8 given that they act as storage facilities for data. In some cases, they may be considered Sui Generis uses where their role is related more to data processing.

15.81 While data centres are important to the functioning of the borough's businesses, they have low employment densities relative to other employment uses and can take up substantial amounts of land and floorspace. In order to ensure that the borough can continue to meet its employment targets and provide sufficient space for new and growing businesses, part 1(a) requires development proposals for data centres to demonstrate that they will not undermine the supply of land or floorspace for employment uses. To satisfy this criterion, development proposals should carry out an assessment of the demand for both office and industrial workspace and clearly demonstrate that the demand can be satisfied without the floorspace that is, or could be, provided on the development site. This assessment should include vacancy rates for nearby industrial and office facilities and have regard to the Employment Land Review (2023). For the purposes of this policy, employment uses include use Class E(g)i-iii, B2, B8 and appropriate Sui Generis uses.

15.82 Part 1(b) recognises that there is a particular demand for data centres to serve businesses in the City of London and Canary Wharf and that they should be located with regard to high capacity fibre optic lines. Data centres that do not serve this specific function or cannot identify a specific locational requirement will not be supported.

15.83 As data centres have high electricity demands and can monopolise capacity in the local supply, placing a limit on the amount of residential development that can be accommodated in an area, Part 1(c) sets requirements on how to manage this resource better / effectively. Capacity should be proven at primary substation, distribution, grid supply point and transmission level, as applicable. It requires development proposals for data centres to engage with electricity suppliers and receive confirmation from those suppliers that the electricity requirements of the proposed data centre can be accommodated without limiting electricity supply such that it would prevent delays to other types of development being delivered in the area.

15.84 Given that data centres are classified as an employment use, part 1(d) requires data centres to provide affordable workspace in accordance with the requirements of Policy EG3. The amount of affordable workspace to be provided will be calculated using the full GIA of the data centre, including space only used for servers. Particular constraints unique to data centres, including their plant needs, floorplates and security concerns, may make on-site provision unfeasible. In these cases, off-site provision or a payment-in-lieu may be accepted.

15.85 Existing data centres in Tower Hamlets often present blank frontages onto pavements and other pedestrian routes. This creates unpleasant spaces and can result in spaces that feel unsafe. Part 1(f) requires the design of data centres to enhance adjacent public realm. This could be through greening or public art. Data centres should also be designed sensitively to ensure that ground floor servicing and plant spaces do not undermine adjacent pedestrian or cycle routes.

15.86 Data centres generate large amounts of heat, which is often rejected to the air outside of the building. In order to help the borough achieve its net zero carbon target, and to reduce the cost of heating

for local residents and businesses, Part 1(g) requires data centres to reuse that heat or to provide it to a local heat network. Cumulative noise impact assessment must prove that sensitive receptors are not negatively affected.

15.87 SILs and POLs play an essential role in ensuring that there is sufficient floorspace to meet the needs of office and industrial businesses in the borough. Given the large amounts of land that data centres occupy, their low employment density and their general inability to co-locate with other employment uses, part 2 of the policy restricts data centres from these designated locations. There may be some circumstances, such as upwards extensions, where an expansion to an existing data centre would not result in a loss of land that could be used for other purposes; these may be considered acceptable where they meet all other policy requirements.

London Plan policies:

- E2 Providing suitable business space
- E3 Affordable workspace
- E4 Land for industry, logistics and services to support London' economic function
- •SI6 Digital connectivity infrastructure

Local Plan policies:

- DV7 Utilities and digital connectivity
- CG2 Low energy buildings
- CG10 Noise and vibration

Evidence base:

- Tower Hamlets Employment Land Review, 2023

16. Town centres



- TC1 – Supporting the network and hierarchy of centres
- TC2 – Protecting the diversity, vitality and viability of town centres
- TC3 – Town centre uses outside centres
- TC4 – Markets
- TC5 – Food and drink
- TC6 – Entertainment uses
- TC7 – Evening and night-time economy
- TC8 – Short-stay accommodation

Introduction

16.1 This chapter focuses on ensuring that our town centres remain vibrant and sustainable while continuing to meet the needs of the people that use them. They also underpin our strategic mission as set out in the Tower Hamlets Strategic Plan to 'support small businesses, start-ups and markets.'

16.2 Town centres form an important part of the borough's distinct identity and character, acting as anchors for local neighbourhoods with a mix of uses and activities that draws our diverse communities together and provide spaces for local entrepreneurs and independent businesses and employment opportunities for local residents. The nature of our town centres continues to change and evolve – they are increasingly becoming hubs for leisure, social and community activities, not just for shopping. They also provide significant opportunities for employment and housing, particularly on upper floors. Additionally, across the borough, there are other areas of commercial, leisure, and retail activity (including individual stand-alone units) which have a role in supporting the borough's needs.

16.3 Town centres continue to be at the heart of the borough's communities, providing spaces for social interaction and leisure and ensuring that residents can meet their day-to-day needs in an accessible and sustainable location.

16.4 In 2020, changes to the Use Class Order resulted in the creation of a new use class, Class E, which incorporates most of the main town centre uses (formerly A Class uses). Retail (Class E(a)), restaurants and cafes (Class E(b)), and professional and financial services (Class E(c)) now fall within Class E, alongside gyms (Class E(d)), health centres and GP surgeries (Class E(e)), nurseries and creches (Class E(f)), and offices,

research and development facilities and light industrial businesses (Class E(g)).

16.5 In 2021, a new permitted development right was introduced across England to allow Class E uses to change to residential use without the need for a full planning permission. Tower Hamlets has introduced an Article 4 Direction, which restricts that permitted development right within most parts of our town centres and designated employment locations.

16.6 The purpose of the Article 4 Direction is to ensure that changes to the use of spaces within our town centres is managed through the

16.7 planning process in accordance with the policies in this chapter and the local plan more broadly. It also ensures that the development of housing in town centres complies with the policies of this plan, including the requirement to provide affordable housing.

16.8 This section contains the following policies.

- Policy TC1: Supporting the network and hierarchy of centres
- Policy TC2: Protecting the diversity, vitality and viability of our town centres
- Policy TC3: Town centre uses outside our town centres
- Policy TC4: Markets
- Policy TC5: Food and drink
- Policy TC6: Entertainment uses
- Policy TC7: Evening and night-time economy
- Policy TC8: Short-stay accommodation



Policy TC1 Supporting the network and hierarchy of centres

1. The council will support the vitality and viability of the borough's town centres by:

- a. promoting a mix of uses focused on retail, food and drink, professional and financial services, leisure, arts and culture, community facilities, recreation and housing;
- b. promoting Primary and Secondary Frontages as the locations within our District Centres where retail uses are located and should be concentrated;
promoting inclusive design, including ensuring that all users feel safe in our town centres throughout the day and night;
promoting night-time economy uses that contribute to the inclusiveness, activity and economic vitality of town centres, including vibrant food and drink, entertainment, leisure and arts and culture uses, alongside late-opening shops and services that meet the needs of those who work at night;
- e. promoting mixed-use and multi-purpose town centres (which include new residential uses where appropriate) with a mix of unit sizes and types, including affordable retail space, to assist in the creation of vibrant centres that offer a diversity of choice, and the meet the needs of local communities;
- f. promoting multifunctional, diverse and inclusive leisure and cultural venues and promoting associated uses;

- g. promoting and focusing markets in town centres and recognising their role in adding variety, promoting local enterprise and contributing to local character;
 - h. supporting meanwhile and community uses where they help to activate and revitalise vacant town centre units and sites; and
 - i. prioritising street level activity along the borough's primary and secondary frontages and key pedestrian routes to encourage opportunities for social interaction.
2. The council will expect development proposals to support the town centre hierarchy and to maintain and enhance the role and function of the town centres:

Table 11: Town Centre Hierarchy

Tier	Location	Functions / roles	Night-time economy designations
Central Activities Zone (CAZ)	Refer to the Policies Map	Apply the London Plan's approach to development within the CAZ.	
Metropolitan Centre	Canary Wharf	<ol style="list-style-type: none"> 1. Provide a large number of leisure, cultural and civic facilities to support a growing residential community. 2. Provide a high proportion of comparison retail compared to convenience to reflect the importance of Canary Wharf as a shopping destination. 3. Continue to support its role as a key global commercial and employment centre. 4. Expand the mix of uses including the introduction of housing where possible. Improve local accessibility to Canary Wharf and its strategic transport interchange, and legibility and way-finding across the area.	Canary Wharf is a night-time economy centre of regional significance.
Tower Hamlets Activity Areas	Refer to the Policies Map	Provide areas of transition between the scale, activity and character of the CAZ and Canary Wharf Metropolitan Centre and their surrounding areas. Support a mix of town centre, employment and community uses. Promote active uses at ground floor level.	

Tier	Location	Functions / roles	Night-time economy designations
CAZ Centres	Wentworth Street Spitalfields Aldgate South	<ol style="list-style-type: none"> 1. Wentworth Street (CAZ Retail Cluster) – support the area's role as home to the historic Petticoat Lane Market and retain the existing concentration of textile and clothing businesses. 2. Spitalfields – support the diverse mix of town centre and employment uses within and around Spitalfields Market, protect its role as an attraction to visitors from across London and beyond and as a vibrant centre of night-time activity. 3. Aldgate South – provide a diverse mix of town centre uses to serve the local residential community and attract visitors from further afield. 	Spitalfields – centre of local significance
Neighbourhood Centres	Aberfeldy Street Barkantine Estate Ben Johnson Road Burdett Road South Cambridge Heath Devons Road Limehouse London City Island Mile End Poplar High Street Salmon Lane South Quay Stroudley Walk Stepney Green Thomas More Wapping Lane	<p>Provide a range of shops and services to meet the needs of their local catchments, with a higher proportion of convenience retail compared to comparison retail.</p> <p>Ensure development is appropriate to the nature and scale of each individual centre.</p>	Cambridge Heath – centre of local significance

Supporting text

16.9 This policy defines the network of centres across the borough (as illustrated on Figure 17) and describes the role and function of each centre and how they will continue to serve the needs of the borough and the wider area. The boundaries of these centres are shown on the Policies Map.

16.10 Town centres act as hubs for the borough's communities and, as such, should incorporate a mixture of complementary uses. This should include housing development where appropriate. The development of housing in town centres can have a positive impact on other uses within the town centre by introducing a larger customer base for local businesses and increasing the overall vibrancy and vitality of the town centre. Town centre housing also ensures that residents are in well-connected locations and can meet their day-to-day needs within easy walking distance from their homes.

16.11 Development within these centres will need to demonstrate how it accords with policies and guidance within the hierarchy as appropriate.

16.12 The western part of the borough (as shown on Figures 6 and 18) lies within the CAZ. The CAZ is the geographical, economic, and administrative heart of London, one of the world's most important financial and business centres, and contains the Metropolitan employment, leisure and retail designations within London.

16.13 All development proposals within this zone should refer to the relevant policies set out in the London Plan and the CAZ Supplementary Planning Guidance.

16.14 Within the CAZ, three areas are designated as 'CAZ Centres'. These are areas within the CAZ that play the role of a neighbourhood centre, with clusters of main town centre uses that serve the needs of the surrounding residential, worker and student community as well as visitors to Central London. Wentworth Street is designated as a CAZ Retail Cluster in the London Plan and includes a particularly significant cluster of clothing and fabric shops and hosts Petticoat Lane Market, which has been in operation for at least 400 years. Spitalfields is locally designated and includes the well-known covered market as well the adjacent streets to the south, which contain a mixture of food and drink businesses that contribute to the evening and night-time economy. Aldgate South (within the Goodman's Fields development) is locally designated and primarily serves the surrounding high-density residential community, but also includes businesses that attract customers from further afield, including a cinema.

16.15 Development within the Metropolitan Centre of Canary Wharf would be expected to demonstrate that it contributes to the continuing growth of Canary Wharf and supports its role as an important centre for international business and finance within the CW POL, as well as its emerging residential neighbourhood at Wood Wharf.

16.16 The Tower Hamlets Activity Areas (as shown on the Policies Map) are specific areas bordering the CAZ and the CW POL where the scale, continuity and intensity of town centre activity and land use is different to that found across the rest of the borough. Within the Tower Hamlets Activity Areas, applicants will be expected to demonstrate how the proposals will enhance movement and connectivity to and through the designation, in particular improving links between Canary Wharf and surrounding areas to the north and south.

16.17 District Centres (as shown on the Policies Map) generally meet more local needs, with catchments of around 800 metres and provision of convenience goods and services. Typically, they contain around 10,000-50,000 square metres of retail, leisure, and service floorspace. They have high levels of accessibility. They are also generally suitable locations for housing and employment.

16.18 Neighbourhood Centres (as shown on the Policies Map) contain clusters of retail and services to meet the needs of a more local catchment and typically contain at least sixteen units. Units are predominantly small-in-scale, with convenience supermarkets of around 500 square metres tending to be the largest occupants. Larger neighbourhood centres may also be appropriate for some leisure and night-time economy uses.

16.19 While of a similar scale to neighbourhood centres, Redchurch Street, Columbia Road, and Hackney Wick serve specialist roles and are therefore given a different designation. Redchurch Street contains a significant cluster of fashion shops that attracts customers from across London as well as a strong food and beverage offer that supports the night-time economy; this cluster will be protected and enhanced by ensuring that new development within Redchurch Street Centre includes small retail and other commercial units that meet the needs of fashion retailers, restaurants, and bars. Columbia Road is known across London for its Sunday flower market and for its mix of small artisanal businesses and village-like character. This character will be supported by ensuring that the commercial units remain very small in size and by resisting any consolidation of ground floor commercial units. Hackney Wick contains a unique mix of industrial and leisure uses, including a regionally significant cluster of arts production and consumption spaces, as well as a strong night-time economy. This area's unique character will be protected and enhanced by retaining existing arts, employment



and leisure uses and ensuring that new development is mixed-use and supports the Creative Enterprise Zone designation.

16.20 The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am, and includes evening uses. Night-time economic activities include eating, drinking, entertainment, shopping, and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport, and medical services, which employ a large number of night-time workers. The night-time economy plays an important role in the borough's economy and Tower Hamlets has a number of town centres that play a particularly significant role

16.21 in the night-time economy. The London Plan designates centres of significance to the night-time economy. In Tower Hamlets these are Canary Wharf, which is designated as a night-time centre of regional significance, and Brick Lane, which is designated as a night-time centre of sub-regional significance. In addition to these centres, the Local Plan designates a number of additional centres that play an important local role in the night-time economy. These includes centres that have large concentrations of food, drink, and entertainment businesses, as well as Whitechapel City, with the arrival of the Elizabeth line and the hospital which brings large numbers of workers and patients through the night.

16.22 Development of night-time uses, particularly food, drink, and entertainment uses, should be related in scale and nature to the centre in which they are proposed. This is to ensure that larger night-time businesses can benefit from existing infrastructure and so that businesses can contribute to the vitality and viability of the centres at night, while limiting their impact on the amenity of other users. The development of night-time uses is addressed in more detail in Policy T7.

16.23 In accordance with Policy EG3, development proposals that include at least 1000sqm of commercial floorspace are expected to provide affordable commercial floorspace. More details can be found in Policy EG3. Where sites are located within town centres, the council may seek the provision of affordable retail or other public-facing commercial space.

London Plan policies:

- SD4 The Central Activities Zone (CAZ)
- SD6 Town centres and high streets
- SD7 Town centres: development principles and Development Plan Documents
- SD8 Town centre network
- Eg Retail, markets and hot food takeaways
- E10 Visitor infrastructure

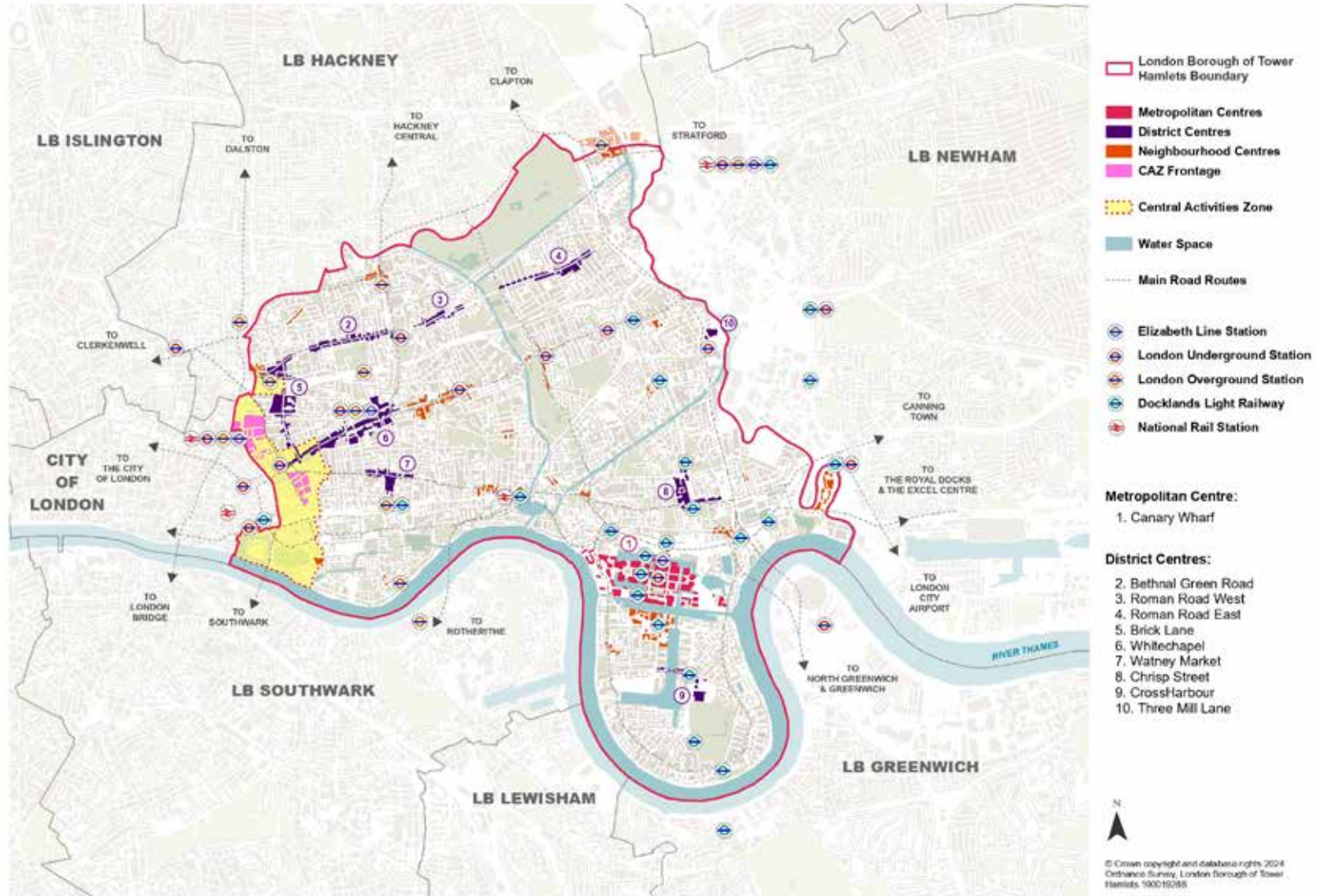
Local Plan policies:

- DV1 Areas of growth and opportunity within Tower Hamlets
- DV2 Delivering sustainable growth in Tower Hamlets
- PS5 Gender Inclusive Design
- PS9 Shopfronts
- CI1 Supporting community facilities
- CI4 Public houses
- CI5 Arts and culture facilities
- MC1 Sustainable travel
- MC2 Active travel and healthy streets
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- London Town Centres Health Check, 2018
- Culture and the Night Time Economy SPG, 2017
- Night Vision: Rebuilding London's Night-Time Economy, 2021

Figure 17: Town centre hierarchy



Policy TC2 Protecting the diversity, vitality and viability of our town centres

1. Development proposals are expected to support the retail function of Primary and Secondary Shopping Frontages and the Redchurch Street and Columbia Road Specialist Centres, prioritising Class E(a) retail uses in these locations. Non-Class E(a) retail uses in Primary Shopping Frontages will only be supported where they can demonstrate that the proposal will not undermine the vibrancy vitality and viability of the town centre, or the level of access to goods and services for local residents.
2. Planning conditions may be used to secure Class E(a) uses that contribute to the retail function of Primary and Secondary Shopping Frontages and the Columbia Road and Redchurch Street Specialist Centres.
3. Where retail development is conditioned for Class E(a) use, development proposals seeking a change to another main town centre use, including full flexibility for Class E commercial, business and service uses, will not be supported unless it can be demonstrated that active marketing has been carried out over a continuous period of at least 6 months at a reasonable market rent which accords with indicative figures.
4. Development proposals for uses other than Class E(a) retail uses (including residential development) within town centres and neighbourhood parades should demonstrate that the development, whether individually or cumulatively with others, will support the retail functions of the town centre by:
 - a. Contributing to the vitality, viability and character of the Primary and Secondary Shopping Frontage;

- b. ensuring access to a range of goods and services;
 - c. being of a type and scale appropriate to the size and function of the centre;
 - d. contributing positively to the quality of public realm, being inclusive, open in character and engaging to the public;
 - e. providing for well-managed and maintained street edges to the town centre;
 - f. where appropriate, responding to neighbourhood and place-specific visions and challenges;
 - g. providing an appropriate main town centre use at the ground level that will attract visitors, and generate footfall; and
 - h. ensuring that they will not result in a negative impact on the amenity of neighbouring occupiers.
5. Development proposals within the Columbia Road and Redchurch Street Specialist Centres should support the existing character by:
 - a. in Columbia Road, retaining small-scale shopfronts no wider than 4m; and
 - b. in Redchurch Street, retaining or re-providing small shopfronts that are suitable for independent fashion retailers.
6. Development proposals for residential uses on the ground floor level or below, within town centres and Neighbourhood Parades will not be supported.
7. Development proposals resulting in a reduction of Class E(a) retail floorspace in town centres and Neighbourhood Parades will not be supported unless they can demonstrate that:

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- a. where there is a sub-division of a large unit, the new units are of a size and scale conducive to supporting the role and function of their surroundings;
 - b. the existing level of floorspace cannot be maintained and that appropriate height, width and depth of floorspace would remain for town centre uses; and
 - c. within Primary Frontages and the boundaries of Columbia Road and Redchurch Street Specialist Centres, any loss of floorspace is of a scale that will not materially alter the nature of the unit, its future viability, and the function of the host shopping area.
8. Meanwhile uses in town centres will be supported in vacant shopfronts and on vacant sites in town centres where:
- a. the proposed uses contribute to the diversity, vitality and viability of town centres having regard to the scale of the proposal in relation to the position of the town centre in the Town Centre Hierarchy;
 - b. the proposal will not result in any negative impacts on the amenity or operations of neighbouring occupiers; and
 - c. a 'move on' plan is provided that makes arrangements for relocation when the site comes forward for development or demonstrates that the use can operate on a temporary basis.
9. Development proposals for payday loan shops will only be permitted in the CAZ, Metropolitan Centre, Tower Hamlets Activity Areas and secondary frontages of the District Centres where they would be at least 400m walking distance from the nearest existing payday loan shop.

Supporting text

16.24 For the purposes of this policy, town centre uses include those listed in the NPPF as 'Main Town Centre Uses': retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels, and conference facilities).

16.25 Part 1 identifies a series of Primary and Secondary Frontages within the District Centres (as shown on the Policies Map). Primary Frontages include a high proportion of (Class E(a)) retail uses, while Secondary Frontages provide opportunities for a greater diversity of main town centre uses to support the vitality and viability of the town centres.

16.26 Part 1 expects development proposals to maintain the predominantly retail character of Primary Shopping Frontages and the mixed character of Secondary Shopping Frontages. Retail uses are directed to Primary Shopping Frontages first and Secondary Shopping Frontages second. In order to demonstrate that development proposals will not undermine the vibrancy, vitality and viability of the town centre, applications should provide an assessment of the current level of retail provision in the Primary Shopping Frontage and across the town centre, demonstrating that a range of goods and services will continue to be provided.

16.27 Within the Secondary Frontages, a wider mix of uses (e.g. financial and professional services, community and leisure facilities) which contribute to the vitality and viability of the town centre will be supported.



16.28 Undesignated frontages are areas within the District Centres that contribute to the overall offer of the centre but perform a more tertiary function (e.g. small offices, wholesalers and market storage) or community functions with little or no retail use.

16.29 Frontages have not been designated within the Canary Wharf Metropolitan Centre. This is because it is a predominantly undercover shopping complex in single, private ownership that functions differently to other town centres in the borough.

16.30 For the purposes of this policy, impacts on the amenity of neighbouring occupiers include odours, fumes and other air pollution,

excess noise and vibrations, reduction in daylight and/or sunlight to habitable rooms, reduction in level of privacy for residents. It is also essential to ensure that development within a town centre does not undermine the operations of other businesses operating in the centre, this includes retaining access routes at all necessary times, retaining sufficient yard or servicing space where relevant, and retaining any existing amenity space such as external seating.

16.31 Parts 1 and 4 expect all types of businesses occupying ground floor spaces in town centres to engage with the street, including maintaining visibility into the business, and providing engaging window displays. Regard should also be had to the Tower Hamlets Shopfront Design Guidance. The Primary Frontages (see Part 1) will have the highest levels of activity and footfall. As such, non-retail uses in these locations should be of a type that enhances the character and attractiveness of the town centre as a place to visit, such as cafés, restaurants and drinking establishments. Other uses would be appropriate on upper floors within the primary frontages, such as offices, gyms, or residential uses. However, access to upper levels must be designed to promote street-level activity and not undermine the viability of ground-level units.

16.32 Due to their unique characters and mix of businesses, part 5 gives specific policy protection to Columbia Road and Redchurch Street. Columbia Road is mainly composed of very small commercial units that house independent artisans. Both the uses and scale of the units contribute to the unique character of street, therefore consolidation of shopfronts and changes of use away from Class E will not be supported. Redchurch Street hosts a mix of small to medium sized retail units that house high-end fashion boutiques and small bars, restaurants and cafes that contribute to their area's night-time economy. In order to protect this important cluster of fashion boutiques, new developments should

ensure that they provide spaces that support these uses, and any proposals non-Class E(a), E(b) or drinking establishment (Sui Generis) uses at ground floor level should demonstrate that they will complement and not undermine the existing mix of uses. More detail regarding night-time uses is provided in Policy T7.

16.33 Part 6 of the policy recognizes that residential uses at ground or basement levels in town centres can provide a substandard level of amenity for residents, with particular issues around privacy. They can also have a sterilising effect on town centres, reducing the vibrancy and vitality of a shopping street and undermining its continuity. Exceptions will be made for residential entrances and lobbies as well as communal space where they support the activation of the street frontage.

16.34 The design, accessibility and layout of town centres will have an important impact upon their success. This policy seeks to promote a range of unit sizes and types within each centre to meet the needs of different users and occupants. In relation to Part 7(a), applicants need to demonstrate that development proposals would not lead to an over-

16.35 supply of particular unit types which confirms that there is a range of unit types across the wider town centre and that there is a need for the size and type of unit being proposed. In addition, the Transport for London's Healthy Streets principles should be applied to the design, accessibility, and layout of town centres in order to ensure they remain attractive and competitive.

16.36 Whilst the changing nature of town centres and consumer demands may mean less need and demand for retail space in some locations, the requirements set out in part 7 where loss of retail (Class



E(a) use) is proposed ensures that any loss will need to be clearly justified (e.g. where units are too large to let as a single entity; therefore subdivision would increase attractiveness to potential occupants).

16.37 However, it is acknowledged that there may be instances where some loss of floorspace within the Primary Frontages contributes to achieving wider objectives, such as the redevelopment of the site or improving access to upper levels. In such cases, street-level retail units should remain of a size and scale that is viable to current or future

occupants and that access to upper levels has been designed so as to not undermine the activity and function of the Primary Frontage. In order to satisfy Part 7, applicants will need to provide examples of other retail units of similar proposed size and layout in the area which are occupied and the types of occupants that such units attract. Information on the local market should also be submitted, including details of retailer demands and lettings in the local area to ensure that development does not result in 'token' retail units being created that are too small for the requirements of occupants.

16.38 Part 8 recognises that the presence of vacant shopfronts and vacant land in town centres can have a significant negative impact on the vitality and viability of the town centres, by reducing the attractiveness of the town centre for customers and reducing footfall. Where a permanent occupier cannot be secured or a site is awaiting redevelopment, the council will support the use of the site for meanwhile uses. These should be uses that enhance the diversity, vitality, and viability of the town centre which, in most cases, will mean uses that engage with the public, such as retail, food and drink, cultural or community uses. The scale of the proposed use, and the traffic it is likely to generate, should reflect the scale of the town centre and its position in the Town Centre Hierarchy as set out in Policy T1. These uses will need to demonstrate that they will not result in significant negative amenity impacts on surrounding occupiers, meaning excess noise pollution, odour, air pollution or light pollution. They will also need to demonstrate that they will not undermine the operations of other businesses within the town centre by, for example, limiting access for deliveries and servicing. The 'move on' plan will need to show how the temporary use will move to a new suitable premise when a permanent occupier takes on the space or it is redeveloped. Where the application

can demonstrate that the use is genuinely temporary in nature – meaning that there will be no loss of employment when the use ceases – a 'move on' plan may not be necessary.

16.39 In accordance with local plan policy EG3, development proposals that include 1,000sqm or more of commercial floorspace are required to provide affordable commercial space. Within town centres, the council may seek affordable space for retail or other public facing, town centre uses.

London Plan policies:

- Eg Retail, markets and hot food takeaways

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts

Evidence base:

- Tower Hamlets Retail and Town Centres Study 2023

Policy TC3 Town centre uses outside our town centres

1. Development proposals for main town centre uses outside of the borough's Metropolitan, District and Neighbourhood Centres, and Site Allocations that include town centre uses, will be subject to:
 - a. a sequential test; and
 - b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace.
2. Development proposals resulting in the loss of Class E(a) retail uses outside of Metropolitan, District or Neighbourhood Centres will only be supported where:
 - a. the shop is within 300 metres walking distance of the nearest alternative Class E(a) retail units; and
 - b. the shop has been vacant for a period of more than 12 months and robust evidence is provided of efforts made to market the shop unit over that period at an appropriate rent (providing examples of three comparable shop units in the vicinity); or
 - c. the site is unsuitable for continued retail use due to its accessibility, size or condition and there is no viable prospect of a retail use on the site, taking account of the projected residential growth in the vicinity.

Supporting text

16.40 New retail development will be directed towards existing centres in accordance with the sequential approach set out in the NPPF which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail also exists in locations outside of Metropolitan, District and Neighbourhood Centres to meet the immediate convenience needs of local people and/or support the function of designated employment locations.

16.41 New retail units or extensions outside of the centres set out in part 1 should not exceed 200 square metres gross floorspace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF. The primary shopping areas of the Metropolitan and District Centres are illustrated on the Policies Map. For Neighbourhood Centres, their boundaries (as illustrated on the Policies Map) will equate to the primary shopping areas of these centres.

16.42 The CAZ and Tower Hamlets Activity Areas have a unique role in the town centre hierarchy. New retail uses may be appropriate in these areas, especially those of a smaller scale, where they would not detrimentally affect the vitality and viability of Metropolitan, District or Neighbourhood Centres. A judgement-based approach will be taken to proposals within these areas and a sequential test and/or impact assessment may still be required where a proposal has a potentially adverse impact on one or more Metropolitan, District or Neighbourhood Centre.

16.43 Part 2 contains a general presumption against the loss of retail space outside of town centres to ensure that residents have access to essential goods and services in close proximity to their homes. However, in certain circumstances, such losses may be justified. Applicants should outline where and how marketing has been undertaken, including evidence of advertising on national commercial and retail property websites and a realistic asking rent. However, it is recognised that in some cases requiring marketing evidence may be counterproductive to enhancing local character if the condition of the property is such that attempting to let it would be unrealistic. In such cases, the applicant should submit a detailed report on the history and condition of the property to robustly justify why marketing evidence should not be required and that re-provided retail space as part of redevelopment would not be viable at the location.

London Plan policies:

- Eg Retail, markets and hot food takeaways

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts

Evidence base:

- Tower Hamlets Retail and Town Centres Study 2023



Policy TC4 Markets

1. Development proposals must support the protection, retention, and enhancement of existing markets. Development proposals in the vicinity of an existing market must demonstrate that:

- a. they demonstrate that the overall quality of the market and public realm will be improved;
- b. the capacity for existing numbers of pitches is maintained, and
- c. they protect or re-provide appropriate storage, waste collection and servicing facilities.

2. Development proposals in the vicinity of existing markets should see out opportunities to enhance those markets through the provision of storage, welfare facilities for market traders, enhanced public realm and facilities for customers, and complementary uses.

3. Development proposals for new markets, including farmers' markets and 'street food' markets, will be encouraged where they do not undermine the viability or vitality of existing markets. They will be directed to Metropolitan, District or Neighbourhood Centres and should enhance the centre's existing offer and contribute to vitality and cohesion.

4. Development proposals for new markets outside of Metropolitan, District or Neighbourhood town Centres will only be supported where they:

- a. are temporary in nature;
- b. bring vacant sites back into use;
- c. do not undermine the borough's existing markets and town centres; and
- d. do not cause unreasonable harm to the amenity of surrounding properties, particularly where evening and night-time markets are proposed.

Supporting text

16.44 Tower Hamlets is known for its distinct and diverse markets. Whitechapel, Roman Road, Bethnal Green and Watney Market play an important role serving local immigrant communities. Crisp Street retains a tangible link to East End History. Columbia Road attracts visitors from across London and beyond to its weekly flower market. Brick Lane Market reflects the changing and mixing communities of the new East End.

16.45 It is widely recognised that markets act as magnets to create interest and draw people into town centres and support footfall which benefits other businesses. They can also act as incubation space for new ideas and small-to-medium enterprises. This policy aims to protect the borough's existing markets and ensure that new development does not undermine their future role and function (e.g. ensuring that storage facilities are maintained).

16.46 Part 1 of this policy refers to the protection of our existing street markets at Bethnal Green, Brick Lane, Crisp Street, Columbia Road, Petticoat Lane, Roman Road, Roman Road Square, Stroudley Walk, Watney Street and Whitechapel City, as well as the Spitalfields covered market.

16.47 Part 2 supports development proposals in the vicinity of existing markets to enhance the functionality, viability, and vitality of those markets through the provision of secure storage space and other servicing facilities, welfare spaces for market traders, enhanced public realm and facilities for customers (including public toilets), and complementary uses. Where a proposal is in the vicinity of an existing market, the applicants should engage with the council's markets team and the market trader associations at an early stage to ensure that any opportunities to enhance the market are pursued.



16.48 In order to meet the requirements of part 3, applicants and developers proposing new markets should work with our markets team at the earliest opportunity so that information can be provided with the planning application to show that sufficient space will be safeguarded to meet the needs of traders in terms of servicing and storage. Proposals should also detail how the types of goods and services proposed would complement rather than compete with surrounding town centres, as well as how they could contribute to other priorities such as improving access to healthy, affordable food. In addition, a written management and design strategy should be provided which outlines how the proposal will avoid causing negative impacts on markets, such as congestion on footpaths and roads, litter, poor refuse storage and noise.

16.49 While new markets within Metropolitan, District or Neighbourhood Centres are favoured, part 4 also recognises that there may be opportunities for markets outside of town centres where they activate vacant spaces.

16.50 Where proposals seek to re-activate vacant spaces or empty shops, temporary permissions will be favoured. Applicants should demonstrate that the proposed market will have a different offer to nearby Metropolitan, District or Neighbourhood Centres to avoid undermining them. They should also demonstrate that noise impacts will be mitigated to protect the amenity of surrounding properties, especially housing.

London Plan policies:

- Retail, markets and hot food takeaways

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design

Evidence base:

- Tower Hamlets Retail and Town Centres Study 2023

Policy TC5 Food and drink

1. Development proposals for cafes, restaurants and drinking establishments (Use Classes E(b) and Sui Generis) will be supported within the CAZ, Tower Hamlets Activity Areas, and town centres (as shown in the Policies Map) provided that:
 - a. they support the role and function of the town centre, having regard to its position in the hierarchy; and
 - b. where proposed within Primary or Secondary Frontages or Columbia Road or Redchurch Street Specialist Centres, they meet the requirements set out in Policy TC2.
2. Development proposals for cafes/restaurants and drinking establishments (Use Classes E(b) and Sui Generis) in Neighbourhood Parades and outside of the town centre hierarchy will be supported provided that:
 - a. cafes and restaurants (Class E(b) uses) can demonstrate that the proposal would support surrounding uses and would not
 - b. undermine the function of nearby town centres, or form part of a concentration of uses that would cumulatively cause harm to the viability of the borough's town centres;
 - c. drinking establishments (Sui Generis use) are local in nature and scale; and
 - d. a drinking establishment outside of a town centre that is associated with, and on the same site as or adjacent to a brewery or distillery may be acceptable where it does not have a significant negative impact on the amenity of neighbouring occupiers.

3. The use of outdoor areas that are ancillary to the relevant use, including garden areas, rooftops, forecourts, and pavements in association with food and drink uses will be supported where:
 - a. this would not cause unacceptable harm to the amenity of adjoining occupiers and uses and the area generally, taking into account the size and type of the proposal, the hours of the use proposed and the nature and character of the area; and
 - b. in the case of pavements, the width of the footway is adequate to allow this without obstructing pedestrian flow, and the use is arranged so as not be a hazard to people with disabilities, older people, and families with small children.
4. Development of hot food takeaways (Sui Generis use) will only be supported within the CAZ, Tower Hamlets Activity Areas, Canary Wharf Metropolitan Centre, Secondary Frontages of District Centres, Neighbourhood Centres and Neighbourhood Parades where they meet the following criteria:
 - a. there must be a separation distance of at least four non-hot food takeaway units between each new hot food takeaway unit;
 - b. the percentage of hot food takeaway units would not exceed 5% of the total number of units within Metropolitan, District or Neighbourhood Centres;
 - c. within Neighbourhood Parades there would be no more than one hot food takeaway unit;
 - d. the proposal is not within 400 metres walking distance from an existing or proposed school and/or local authority leisure centre;
 - e. the proposal will not harm the amenity of surrounding properties;

- f. drive-through takeaways will not be supported and proposals for the redevelopment of existing drive-through takeaways for other uses will be supported, subject to other development plan policies; and
 - g. hot food takeaway businesses are expected to achieve and operate in compliance with the Healthier Catering Commitment standard.
5. Development proposals for food and drink uses where home delivery of food is proposed will be supported where they demonstrate that:

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- a. the scale of the operation, locations of delivery collection points, locations for parking of delivery vehicles and hours of operations will not result in negative impacts on the amenity of neighbouring residential dwellings and the operations of neighbouring businesses;
- b. sufficient welfare facilities are provided on site to meet the needs of the delivery drivers/riders, including toilets and rest areas; and
- c. delivery operations will not impede the footway or roadway, taking into account the needs of people with disabilities, older people, and families with small children.

Supporting text

16.51 Where the policy refers to food and drink uses, these include restaurants, cafés, pubs, and other drinking establishments. Hot-food takeaway uses (Sui Generis) are addressed separately within part 3 of the policy.

16.52 Part 1 recognises that food and drink businesses play an important role in town centres. As the demand for traditional retail has diminished, restaurants, cafes, bars, and pubs are increasingly acting as anchors and Metropolitan attractors to town centres. These businesses can also play an important role in supporting their local communities. Cafes and pubs provide spaces for local residents, workers, students and visitors to meet and socialise. They also often host events and provide space for formal community meetings. Restaurants can often reflect the diverse backgrounds of the local community and establish a sense of place within a town centre. This is evident in all the borough's town centres, but especially in Brick Lane, where the South Asian restaurants are a key element in the character of the high street and attract visitors from across London and beyond. Food and drink businesses are encouraged to support and reflect the diverse communities within their local areas.

16.53 Primary Retail Frontages are the core shopping areas of district centres. While food and drink businesses can contribute to the vitality and viability of these areas, it is important that they not undermine their retail function. As such, uses other than E(a) retail proposed on Primary and Secondary Shopping Frontages are required to meet the test of Policy TC2.

16.54 While food and drink uses are directed to Metropolitan, District and Neighbourhood Centres and the CAZ and Tower Hamlets Activity Areas, part 2 recognises that there are some circumstances in which these businesses may be appropriate in Neighbourhood Parades and

outside of the town centre hierarchy. Examples might include facilities that enhance the enjoyment of open spaces and water spaces; serve transport interchanges or serve out-of-town-centre employment areas. For instance, pubs play an important role as community meeting spaces and can often be located in otherwise wholly residential areas or industrial areas. Tower Hamlets also contains a number of micro-breweries and distilleries. These are often located within industrial areas and may include tap rooms or bars. The primary use of these facilities should be the production of beverages, and the bar or tap room should take up a relatively small proportion of the floor area. A condition may be imposed limiting the size of the bar or tap room to ensure that it remains a secondary use.

16.55 Within Neighbourhood Parades and non-designated locations, proposals involving food and drink uses should be of a more modest scale than might be expected in larger town centres. Applicants should robustly state why a café, restaurant or drinking establishment would be appropriate in such a location. Details of any other cafés, restaurants or drinking establishments in the local area should also be provided to mitigate the risk of clusters developing that could undermine nearby town centres. In respect of drinking establishments, a detailed management plan should be submitted alongside the planning application confirming that it will be run as a 'community' public house and that conflicts with neighbouring properties would be avoided. Applicants would also be encouraged to consider our statement of licensing policy.

16.56 Part 3 recognises that the use of outdoor space, including garden space and front pavement/forecourt space, by food and beverage businesses can enhance the vitality of a town centre by making the use more visible and engaging with the public realm. It can also improve the viability of the businesses by increasing their space to accommodate



customers and making the businesses more attractive to potential customers. While the use of outdoor spaces for food and drink uses is broadly supported in town centres, it is essential to ensure that these uses do not have a negative impact on neighbouring occupiers in terms of amenity. Applicants should demonstrate that the use of the outdoor space will not have a significant negative impact on neighbouring residential occupiers in terms of noise, odours or fumes and will not impede the operations of other businesses through a reduction in useable yard, street, or alley space. Where the outdoor use is proposed adjacent to the footway, the applicant will need to demonstrate that it will not impede pedestrian traffic or undermine access by those with

disabilities and other street users who require additional clear footway space.

16.57 With a commitment to improve the health of its residents and to reducing childhood obesity, part 4 of this policy restricts hot food takeaway businesses within 400 metres from a school or council leisure centre, which equates to a walking time of 10 minutes and will help to reduce young people's access to unhealthy food options. 400 metres will be calculated on the basis of the shortest walking distance from the entrances and exits of an existing or proposed primary or secondary school. In order to satisfy part 4, planning applications will be expected to include information (including town centre surveys) in order to ensure that any provision of new hot food takeaways would not exceed the levels set out in parts (a) to (c). Development proposals for hot-food takeaways should also have regard to the Health Impact Policy. This policy may be applied flexibly within the Canary Wharf Metropolitan Centre, where hot food takeaways typically support local workers and are unlikely to attract young people.

16.58 Drive-through takeaway businesses encourage the use of private vehicles and create unfriendly and in some cases unsafe pedestrian and cycle environments. Therefore, new drive-through takeaways will not be supported, and the council will generally support schemes that propose to redevelop existing drive-through takeaways where they accord with other relevant policies.

16.59 Food businesses where all, or a significant proportion, of the business is via delivery can have a significant impact on the public realm and on the amenity of surrounding occupiers. This includes both 'dark kitchens' – food businesses that cater only to delivery customers, and traditional restaurants and takeaways with a high level of delivery business. Where these businesses are located on busy

high streets, delivery drivers waiting for orders and their cycles can act as obstacles to pedestrian traffic and in particular to disabled and mobility-impaired users, those with visual impairments, parents with buggies and other pedestrians with large baggage. Businesses with a significant delivery component should provide a Delivery Management Plan that demonstrates that waiting delivery drivers and their cycles can be accommodated off the pavement, and the pavement should only be used in exceptional circumstances where the pavement is particularly wide and has an exceptionally low level of pedestrian traffic. The Delivery Management Plan should also demonstrate the provision of welfare facilities for the delivery drivers, including toilets and rest areas. The Delivery Management Plan, and the level of accommodation proposed should be proportionate to the scale of the business and its expected level of delivery; for example, an application for a 'dark kitchen' will need to provide more significant welfare facilities for drivers and dedicated space off-street to accommodate drivers and their cycles.

London Plan policies:

- Eg Retail, markets and hot food takeaways

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts
- Cl4 Public houses

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- Tower Hamlets Hot Food Takeaway Topic Paper, 2023
- London Takeaways Toolkit, 2012

Policy TC6 Entertainment uses

1. Development proposals for new betting offices/shops (Sui Generis use) will only be supported within the CAZ, Tower Hamlets Activity Areas, Canary Wharf Metropolitan Centre or Secondary Frontages within District Centres where they can demonstrate that:

- a. the proposed development is not within 400m walking distance of an existing gambling establishment;
- b. the site is not in close proximity to a school or sensitive community or cultural facility; and
- c. the proposal would not have a negative impact on the amenity or character of the area.

2. Casinos and other gambling establishments will only be supported within the CAZ or Canary Wharf Metropolitan centre where they can demonstrate that:

- a. the proposed development is not within 400m walking distance of an existing gambling establishment;
- b. the site is not within close proximity to a school or sensitive community or cultural facility; and
- c. the proposal would not have a negative impact on the amenity or character of the area.

3. Development proposals for other commercial leisure uses, including gaming arcades and competitive leisure businesses (e.g. escape rooms, mini golf, bowling alleys and VR sports) will be directed to the CAZ, Metropolitan Centre, District Centres, Tower Hamlets Activity Areas and Neighbourhood Centres in accordance with the scale of the proposed facility.

4. The commercial leisure uses listed in part 3 will only be supported in Neighbourhood Parades or outside of the town centre hierarchy where:

- a. it can be demonstrated that such uses will not result in adverse impacts on the amenity of the surrounding area; and
- b. the location has good public transport accessibility.

Supporting text

16.60 Parts 1 and 2 recognise that concentrations of betting shops, casinos and other gambling establishments present a high level of risk to those with gambling addictions or those susceptible to addiction. Concentrations of these businesses allow those with addictions to by-pass safeguards limiting betting levels by visiting multiple establishments. Given that Tower Hamlets has a high proportion of residents at risk of problem gambling, parts 1 and 2 set a strict limit on the concentration of these establishments, requiring a separation distance of 400m, which is about a 5-minute walk. Betting shops and other gambling establishments also have a negative impact on the wider town centre by reducing footfall relative to other town centre uses and by creating an impression of blight in the area. They also carry a risk of attracting anti-social behaviour.

16.61 It should be noted that facilities for gambling, including betting shops and casinos require a license from the council to operate. This is separate from the planning regime.

16.62 Part 3 recognises that commercial leisure businesses can act as attractors and support the vitality and viability of town centres. These uses will be directed to town centres in accordance with their scale and with regard to the town centre hierarchy. Proposals for these uses, where they intend to operate in the evening or at night should have regard to Policy TC7. Where these uses are Arts and Culture facilities (including cinemas, theatres, live music venues and nightclubs) they should also have regard to Policy C5.

16.63 Part 4 recognises that commercial leisure businesses may be appropriate in neighbourhood parades and outside the town centre hierarchy, but must demonstrate that the site has good public transport access to ensure that visitors can access the business sustainably, and that it will not have a negative impact on surrounding residents.

London Plan policies:

- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts
- CI5 Arts and culture facilities

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- Tower Hamlets Betting Shops Topic Paper, 2023
- Culture and Night Time Economy, SPG 2017

Policy TC7 Evening and night-time economy

1. Proposals for food, drink, leisure, and entertainment uses operating in the evening and at night will be supported in Metropolitan, District and Neighbourhood Centres and in the CAZ and Hackney Wick and Fish Island Creative Enterprise Zone, where they:
 - a. have regard to the strategic night-time economy designations listed in Part 2 of Policy T1 of the London Plan;
 - b. do not contribute to an overconcentration of particular uses that could give rise to negative cumulative social impacts;
 - c. contribute to the diversification of the evening and night-time activities within the town centre; and
 - d. are accompanied by a management plan, setting out mitigation measures for any negative impacts.
2. Proposals for evening and night-time activities outside of the town centre hierarchy will only be supported where:
 - a. they provide robust justification demonstrating why the use cannot be located in a town centre;
 - b. the location has a high level of night-time public transport accessibility; and
 - c. they are accompanied by a management plan, setting out mitigation measures for any negative impacts.

3. Proposals for late-opening and 24-hour shops, services and cafes will be supported in Metropolitan, District and Neighbourhood Centres, particularly where they serve an area with a large number of evening and night-workers, such as around the Royal London Hospital and Brick Lane. Proposals for late opening and 24-hour shops and cafes should ensure that they do not give rise to significant negative amenity impacts for neighbouring occupiers.
4. The Agent of Change principle will be applied to all new noise-sensitive development in close proximity to existing night-time economy uses and in designated night-time economy centres.

Supporting text

16.64 The evening and night-time economy refers to businesses, organisations and activities that operate between the hours of 6pm and 6am. While it is traditionally associated with food and drink and cultural activities, it also includes late-opening retail businesses, as well as the many workers outside of these industries that work at night, including hospital workers, bus drivers, and wholesale market workers among many others.

16.65 Part 1 recognises that evening and night-time food, drink, leisure and culture businesses and organisations are an important part of the Tower Hamlets economy and contribute to the vitality, vibrancy, and sense of place of our town centres.

16.66 Proposals for night-time economy uses should be related in scale and nature to the centre in which they are proposed and its classification as a night-time economy centre in Policy TC1 and in the London Plan. Larger-scale night-time leisure uses, such as nightclubs and larger cinemas would normally be directed to the Canary Wharf Metropolitan Centre and Brick Lane District Centre, while smaller-scale night-time uses such as bars, smaller cinemas, small to medium sized theatres and music venues would be directed to all centres listed in point 2 of Policy TC1.

16.67 Large concentrations of night-time uses, particularly those that are focused on alcohol consumption, can have negative impacts on the amenity and safety of the surrounding area. They can also reduce the daytime vitality and viability of the town centre if they are only open from the evening. It is, therefore, important to ensure that the development of new night-time uses does not result in an overconcentration. Applicants should provide information on the number of similar uses that operate



in the evening and at night within the centre to demonstrate that the proposed development will not result in an overconcentration.

16.68 Tower Hamlets is a diverse borough and includes many residents for whom night-time activities involving the consumption of alcohol are not desirable. As such, the council will generally be supportive of proposals that seek to diversify the night-time economy and propose uses operating at night that are not oriented around the consumption of alcohol; for example, late-opening cafes and dessert parlours. In addition, many night-time activities exclude those who lack the resources to pay for drinks or food. The council will generally support proposals that include night-time activities that are free or low-cost and

particularly those that provide space and activities for young people.

16.69 In order to ensure that any impacts of night-time uses are adequately mitigated, proposals for evening and night-time entertainment and leisure uses will be expected to submit a management plan. The management plan must show how any potential amenity impacts arising from the proposed development, including noise, odours, fumes, and anti-social behaviour will be mitigated. The management plan should be proportionate to the scale of the proposal and to the type of use being proposed. It may include measures to disperse customers after an event, details of security arrangements to limit anti-social behaviour, proposed hours of operation and methods to limit smoking outside of the building among other matters.

16.70 The council also encourages night-time uses to sign up to schemes that seek to improve the safety of leisure and night-time activities, particularly those that involve the consumption of alcohol. Such schemes include 'Ask for Angela' and National Pubwatch.

16.71 Given the town centres first approach taken by the Local Plan, the London Plan and the NPPF, Part 2 requires proposals for night-time uses outside of town centres to robustly demonstrate that they cannot be accommodated in a town centre location. Where night-time uses are proposed outside of the town centre hierarchy, they should demonstrate that the site has good night-time public transport accessibility, meaning that the site is within 400m (roughly a 5-minute walk) of a night bus stop or night tube station.

16.72 Tower Hamlets has many workers and residents who work in the evening and at night. In order to better serve those who do not have access to shops and services during normal business hours, part 3 encourages late-opening and 24-hour shops and services in

the borough's town centres, and in particular those centres with large concentrations of night workers, such as Whitechapel City and Brick Lane.

16.73 Part 4 recognises that the London Plan has established the 'Agent of Change' principle, whereby it will be the responsibility of a new development to sufficiently mitigate any impact existing uses might have on its occupiers. In the case of development in town centres with a significant night time economy, new residential development will be required to provide sufficient soundproofing and to be oriented in a way to ensure that residents do not experience unreasonable levels of noise from night-time uses.

London Plan policies:

- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts
- CI4 Public houses
- CI5 Arts and culture facilities

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- Night Vision: Rebuilding London's Night-Time Economy, 2021
- Culture and Night Time Economy SPG, 2017

Policy TC8 Short-stay accommodation

1. Development proposals for visitor accommodation will be supported in locations within the CAZ, Canary Wharf Metropolitan Centre, Tower Hamlets Activity Areas and District Centres (as shown on the Policies Map) or along primary routes where adjacent to transport interchanges, where it can be demonstrated that:

- a. the size, scale and nature of the proposal is proportionate to its location;
- b. the applicant can demonstrate that there is sufficient demand for the proposal within the local area;
the proposal would not compromise the supply of C3 self-contained homes and would not undermine the Borough's ability to deliver against strategic housing and employment targets; and
- d. the applicant can demonstrate adequate access and servicing arrangements appropriate to the scale, nature, and location of the proposal.

Supporting text

16.74 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.

16.75 Part 1 seeks to steer visitor accommodation towards the CAZ, Canary Wharf Metropolitan Centre, Tower Hamlets Activity Areas, and the borough's District Centres, or in other locations with very good public transport accessibility.

16.76 Part 1(a) expects development proposals for short stay accommodation to be of a size that reflects their surrounding built environment and reflects the function of the location within town centres or employment areas. For example, a large-scale hotel that is appropriate in the Metropolitan Centre of Canary Wharf may not be suitable within a smaller District Centre.

16.77 Part 1(b) seeks to ensure development proposals for short stay accommodation are responding to demand. In order to comply with this policy requirement, applications should include an assessment of the level of demand and supply of visitor accommodation within the relevant sub-area. This assessment should have regard to the type of accommodation proposed and its price point, and should include consented and proposed visitor accommodation in addition to that currently operating.

16.78 In order to comply with Part 1(c), development proposals will need to demonstrate that the proposed site is not allocated for residential or employment development within a site allocation or employment designation and does not have an extant planning permission for residential or employment development.

16.79 In accordance with Part 1(d), development proposals for short stay accommodation will need to submit information detailing how customers would access the accommodation - there is a general expectation that most visitors staying in hotels in Tower Hamlets will be accessing their accommodation by public transport, but taxi and other vehicle drop-off spaces may be required depending on the scale of the proposal. This would also apply to any vehicles required to service the accommodation (e.g. to handle laundry and deliver other supplies to the accommodation).

16.80 It should be demonstrated that such movements would not create unacceptable impacts on residential amenity or highway safety in accordance with Policies D.DH8 and D.TR2.

16.81 This policy applies a flexible approach to the assessment of new visitor accommodation. This recognises the different markets that various forms of visitor accommodation may serve, and the way in which customers and service vehicles may access such accommodation. For example, traveller hostels, budget hotels and small boutique hotels are less likely to require significant space for coaches and other vehicles setting down and picking up movements as customers are more likely to arrive via public transport.

16.82 For serviced apartments, development will be required to provide the following details:

- management will ensure rooms will not be occupied for periods of 90 days or more;
- management will provide 24-hour servicing;
- 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
- management will have access to the room.

London Plan policies:

- E10 Visitor Infrastructure

Local Plan policies:

- HC1 Meeting housing needs
- PS1 Design- and infrastructure-led approach to development
- PS2 Tall buildings
- PS3 Securing design quality
- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS8 Shaping and managing views
- EG1 Creating investment and jobs

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- London-wide projections of demand and supply for visitor accommodation, 2017

17. Community infrastructure

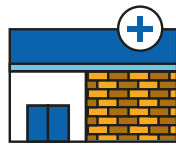
Cl1 – Supporting community facilities

Cl2 – Existing community facilities

Cl3 – New and enhanced community facilities

Cl4 – Public houses

Cl5 – Arts and culture facilities



Introduction

17.1 Tower Hamlets has a range of community facilities such as health, social, education, leisure, cultural, and sport facilities providing valuable services to both local communities and visitors. The provision of these essential community facilities plays a vital role in creating and sustaining healthy and liveable neighbourhoods.

17.2 Parks and open spaces are also key elements of community infrastructure that are a vital part of the borough, improving the health and well-being of communities by enabling social interaction, providing informal meeting spaces, and facilitating active lifestyles and recreation. These spaces must be protected and enhanced and are covered in the biodiversity and open space section of this Local Plan.

17.3 Community facilities are facing increased pressure from higher land value uses, such as housing and employment. In the face of limited public funding and a fast-growing population, it is important these facilities are still able to maintain their offer of such valuable services. In particular by opening up opportunities for all residents, including young people and women, to participate in a wide range of local sporting and cultural opportunities. Facilities away from home, work, and school – such as libraries, community centres and parks – provide an important space for social interaction to occur and for the community to gather, bringing people from different backgrounds together and promoting understanding. The protection and support of these community facilities is essential to help empower communities, fight crime and support underrepresented groups in Tower Hamlets.

17.4 The following policies will seek to promote and facilitate the delivery of essential community facilities through new development (including changes of use, extensions, and new builds) in line with the Infrastructure Delivery Plan, which outlines the existing capacity and future needs and priorities facing some of the community facilities in the borough. In particular, the policies in this chapter aim to ensure that sufficient facilities are provided to meet the needs of the borough's growing population in the areas of greatest need and growth, such as the borough's site allocations.

17.5 This section contains the following policies:

- Policy CI1: Supporting community facilities
- Policy CI2: Existing community facilities
- Policy CI3: New and enhanced community facilities
- Policy CI4: Public houses
- Policy CI5: Arts and culture facilities



Policy C11 Supporting community facilities

1. The council will support development proposals which seek to protect, maintain, and enhance existing community facilities.
2. The council will expect development proposals to contribute to the capacity, quality, usability, inclusivity, and accessibility of existing community facilities, particularly where development will increase demand for the facility.
3. The council will expect development proposals to maximise opportunities for the provision of high-quality community facilities, designed to maximise adaptability and flexibility to offer a mix of different functions to serve a wide range of users. Where possible, facilities or services should be accessible to the wider community outside of core hours and co-located or shared to encourage multi-purpose trips and best meet the needs of different groups and delivering social value to the community.
4. New community facilities will be directed towards the borough's centres in accordance with the town centre hierarchy and/or to locations which are accessible to their catchments depending on the nature and scale of the proposal.
5. The council will expect strategic development proposals for residential development to deliver a community facility on-site, where evidence demonstrates a need for the local area.

Supporting text

17.6 This policy seeks to maintain an adequate supply and range of community facilities across the borough to serve local needs and support the creation of more liveable and sustainable places. Delivery of new and improvements to existing community facilities will be achieved through the use of developer contributions (as identified in Policy DV5) and working together with partners to ensure adequate services are in place to support the sustainable growth of the borough.

17.7 For the purpose of this policy, community facilities include a range of social infrastructure that provide services to the community such as:

- indoor sports and leisure facilities (e.g. leisure centres and swimming pools);
- health facilities (e.g. hospitals and doctor surgeries);
- cultural facilities (e.g. art galleries, music venues, museums, nightclubs, cinemas and theatres);
- education facilities (e.g. schools, nurseries and universities); and
- social facilities (e.g. places of worship, libraries, Idea Stores, local presence and public houses).

17.8 Playing fields and outdoor sport facilities, such as multi-use games areas and tennis courts, are also important community facilities. These are addressed within policies BO1 and DV1.

17.9 Part 1 of the policy states that development proposals that will protect, maintain, and enhance community facilities will be supported, to ensure that sufficient and high-quality provision is available to meet local needs.

17.10 Part 2 promotes opportunities to expand or improve the capacity and accessibility of existing facilities, taking account of future projected



community needs (as set out in the Infrastructure Delivery Plan).

17.11 Part 3 seeks to encourage the provision of multi-purpose and shared services which provide opportunities to co-locate or integrate a range of community uses and functions, such as community halls and sport facilities. Consideration should be given to promoting community facilities which can be easily accessed, support a wide range of users in line with the principles of active and inclusive design and make relevant provision outside of core hours, particularly in respect of childcare provision, external recreation space, sport facilities and appropriate classroom space.

17.12 Part 4 seeks to ensure that community facilities are located within or at the edge of town centres in line with policies TC1 and DV1. These locations are considered to be the most accessible places in the borough and such uses contribute to the vitality and viability of town centres. In addition, new facilities will be directed towards locations which are accessible to their catchment areas through strong public transport links and by prioritising active travel.

17.13 This policy will be delivered in accordance with the Infrastructure Delivery Plan and other relevant strategies, including the Indoor Sports Facilities Strategy, Open Space Strategy, Green Grid Strategy, and area-based masterplans. We will continue to work with key stakeholders and other service providers to ensure that new community facilities are provided at locations where there is a clearly demonstrated need.

17.14 Part 5 of this policy requires development proposals to provide an on-site community facility as part of strategic residential development applications where up to date evidence demonstrates that this is required. Such provision would need to support and reflect the needs of the borough's culturally diverse community. Applicants must engage with the council's planning team as early as possible to determine the nature of the community facility, and ensure it will be meeting the needs of the local area. Applicants must demonstrate through the pre-application and application stage how the provision of the community facility has been considered as part of the design process, and that consultation has been undertaken with local residents and key stakeholders to determine what facilities are likely to be appropriate. The council will expect such provision to be made unless design constraints and/or viability make such a facility undeliverable or there is a clear justification that residents of the proposed development and surrounding area have access to a proximate community facility.

London Plan policies:

- S1 Developing London's social infrastructure
- SD8 Town centre network

Local Plan policies:

- DV1 Areas of growth and opportunity within Tower Hamlets
- DV5 Developer contributions
- DV6 Promoting Social Value
- TC1 Supporting the network and hierarchy of centres
- BO1 Green and blue infrastructure
- MC2 Active Travel and healthy streets

Evidence base:

- Planning for Sport Guidance, 2019
- Active Design, 2015
- Tower Hamlets Infrastructure Delivery Plan, 2023
- Planning and Social Cohesion Evidence Base, 2020
- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Water Space Study, 2017
- Leisure Facilities Strategy, 2018
- Leisure Needs Assessment, c. end of 2023
- Physical Activity and Sport Strategy, 2019
- Tower Hamlets Community Facilities Audit, 2023



Policy CI2 Existing community facilities

1. Development proposals must retain existing community facilities unless it can be demonstrated that:
 - a. there is no longer a need for the facility or any alternative community use within the local community; or
 - b. a replacement facility of similar nature that would better meet the needs of existing users is provided.
2. Where community facilities are re-provided on site as part of the development proposal, the quality, inclusivity, and accessibility of these facilities (including public access) should be enhanced.
3. Development proposals should ensure the re-provided facility remains viable and accessible to the local community, while prioritising the existing use staying open until the re-provided facility is operational. The development proposal must demonstrate the following measures have been taken as part of any re-provision:
 - a. early engagement with the facility operator, and an agreement met on the quality of the re-provided space;
 - b. analysis of market rents for comparative uses in the area to demonstrate the affordability of the re-provided facility;
 - c. re-provision of a sufficient fit out for the successful operation of the facility as agreed with the existing operator; and
 - d. a local decant strategy is put in place where appropriate when maintaining no break in provision of the facility on site is demonstrated to not be possible, with costs of this met by the development proposal.
4. Extensions to existing schools should demonstrate that:
 - a. there is a local need; and
 - b. the current level of child play space will be enhanced and increased.
5. Development proposals that would result in an existing community facility remaining closed for an extended period of time should provide a temporary facility that allows the community facility to continue operating until a permanent space can be occupied.

Supporting text

17.15 This policy seeks to protect and enhance the borough's existing community facilities where they are still needed to adequately meet local needs.

17.16 Part 1 seeks to resist the loss of the borough's valuable community facilities, except in certain circumstances, see (a) and (b). Statements from relevant providers confirming that the existing or any alternative community uses would not be needed or possible in the premises will be required. Where the loss of a community facility is justified, the applicant will need to explore the opportunity to accommodate an alternative community use which would better meet local needs, in accordance with relevant strategies, including the Indoor Sports Facilities Strategy, Open Space Strategy, and Infrastructure Delivery Plan. Loss of sports and recreational facilities will only be justified where an applicant can provide a robust assessment demonstrating surplus provision or where the proposal includes a replacement of the facility with at least an equivalent function, quality and quantity of sport provision that better meets the needs of the community.

17.17 The council recognises that in certain circumstances site redevelopment will require the relocation of existing uses to a location where the needs of the users will be more adequately met. To ensure that there is no unacceptable disadvantage to existing users, re-provision of community facilities should be within the relevant catchment area and should result in quality and access improvements, reflecting the principles of active and inclusive design. Proposals should also demonstrate that adequate floorspace in an appropriate configuration is provided to ensure the continued viability of the facility including any amenity space that can be used for wider community



uses, and this should not result in a net loss of floorspace unless justified by demonstrating that the floorspace lost is surplus to need.

17.18 Part 2 seeks to ensure that new development facilitates and promotes greater public access through good and inclusive design and signage.

17.19 Part 3 seeks to ensure that the re-provided community facility remains viable for the operator and stays affordable for the local community and users. Early engagement and an agreement with the facility operator must be established to ensure their requirements would be met and that the re-provided facility remains viable for them.

Analysis of market rents for comparative uses in the area should be provided in order to demonstrate the affordability of the re-provided facility. The development proposal must include the reprovision of a sufficient fit out for the successful operation of the facility as agreed with the existing operator. Where practicable, the replacement facility should be provided before the existing facility ceases operation to ensure that local people continue to receive a high-quality service. However, where maintaining no break in provision of the facility on site is not possible, a local decant strategy should be put in place, with the developer and not the community facility operator meeting the costs of this, agreed via a planning obligation.

17.20 Part 4 seeks to ensure that any extension to an existing school results in an increase of existing child play space to accommodate the additional needs arising from the development, with a view to promoting shared community use in line with Sport England's guidance. Proposals to replace indoor sports and recreational facilities must be of at least equivalent function, quality, and quantity and in a suitable location.

17.21 Part 5 seeks to ensure that there is no significant gap in the provision of a community facility as a result of redevelopment. The length of time that would constitute 'an extended period of time' for the purposes of this policy will vary depending on the nature of the community facility and the community it serves, but in any case a closure of more than three months will require the provision of a temporary facility. The temporary facility should be designed in conjunction with the community facility operator and should meet their needs. Its location should be in close proximity to the existing facility, and should be easily accessible to the community that the facility serves.

London Plan policies:

- S2 Health and social care facilities
- S3 Education and childcare facilities
- S4 Play and informal recreation
- S5 Sports and recreation facilities

Local Plan policies:

- PS5 Gender Inclusive Design
- MC2 Active Travel and healthy streets
- DV5 Developer contributions
- DV6 Promoting Social Value

Evidence base:

- Planning for Sport Guidance, 2019
- Active Design, 2015
- Health Building Note 00-01, General design guidance for healthcare, 2014
- Baseline designs for schools: guidance, 2014
- Area Guidelines for Mainstream Schools, Building Bulletin 103, 2014
- Tower Hamlets Infrastructure Delivery Plan, 2023
- Planning and Social Cohesion Evidence Base, 2020
- Tower Hamlets Indoor Sports Facilities Strategy, 2017
- London of Borough of Tower Hamlets School Design Guide, 2021
- Tower Hamlets Leisure Facilities Strategy, 2018
- Tower Hamlets Leisure Needs Assessment, 2023
- Physical Activity and Sport Strategy, 2019
- Tower Hamlets Community Facilities Audit, 2023

Policy CI3 New and enhanced community facilities

1. Development proposals for new community facilities will be directed towards the identified town centre locations. Development proposals involving the provision of community facilities located outside the borough's town centres will be supported where an up-to-date and robust local need can be demonstrated.
2. Development proposals for new community facilities should demonstrate that early consultation has been undertaken with the intended operator and users of the space. All community facilities must be culturally sensitive and reflect the needs of the diverse communities living in the borough. This should include evidence of a co-design process to ensure the new facility best meets the needs of the local community.
3. New community facilities should ensure they charge fees affordable to members of the community, and community facilities within larger developments should be easily accessible to people, and inclusive of the borough's diverse range of users who live and work outside of the host development.
4. Development proposals for new community facilities or for extensions and enhancements to existing facilities should be of high design quality, including:
 - a. being designed to maximise adaptability over their lifetime demonstrating that the space can accommodate a range of role requirements, to ensure it serves the changing needs of the local community; and
 - b. making efficient and effective use of the site to maximise the opportunities for multi-purpose and shared use facilities.
5. Development proposals for new primary and secondary schools which respond to local need will be supported where:
 - a. they are in locations which are accessible to the residents of their indicative catchment areas;
 - b. they can demonstrate appropriate learning spaces (including external play space) can be provided; and
 - c. the design and layout of these facilities and play space provision reflects the relevant guidance from the Department for Education and Sport England, taking account of the level of air quality and other amenity considerations.
6. Development proposals for new early education and care facilities which respond to local need will be supported where:
 - a. they are in locations which are accessible to the local residents or working community, with new housing and/or commercial developments encouraged to provide childcare facilities within the development where there is a need;
 - b. they can demonstrate the design and layout of the facility considers the relevant Ofsted and Department for Education guidance, meeting the needs of young children and promoting their development; and
 - c. they can demonstrate the facility is located within an area of acceptable air quality and incorporates suitable and accessible outdoor space to provide both indoor and outdoor learning opportunities. Where possible, facilities should be located within

proximity to accessible parks, green spaces or outdoor play space, to promote the health and well-being of young children.

7. Development proposals for new adult, further and higher educational facilities will be required to provide information of the relevant certification and registration details from the Department for Education and meet Sport England's design guidance and other relevant national governing bodies' guidance.
8. Development proposals for community uses on meanwhile or vacant sites will be supported, particularly where they bring into use vacant developable land on a temporary basis, when:
 - a. they can demonstrate there is a local need for such use;
 - b. they can demonstrate the site is easily accessible and affordable for the local community;
 - c. they can provide evidence of preventing or mitigating any adverse amenity impacts; and
 - d. they provide a 'move on' plan that makes arrangements for relocation when the site comes forward for development or demonstrate that the need for the use is temporary.

Supporting text

17.22 This policy seeks to ensure that appropriate high quality community facilities are provided in accessible locations throughout the borough, particularly via methods of active travel and public transport, to adequately support the growing population and meet identified needs.

17.23 Part 1 seeks to ensure that expansion of existing and delivery of new community facilities is directed towards accessible locations such as town centres. However, new community facilities outside of town centres will only be supported where sufficient evidence is provided to demonstrate that there is a local need not being met elsewhere in the neighbourhood. Facilities provided in these locations need to ensure that they are local in nature and scale and that there is no adverse impact on the amenity of the surrounding residents. This includes the impact of people coming and going to the facility and the impact of users within the facility when it is in use, as well as the impact on the highway network and parking facilities. Where the provision of a community facility is proposed as part of a residential development, it should be demonstrated that it is accessible to people living outside of the development and designed to be visible from the street.

17.24 Part 2 aims to ensure early consultation and co-design is undertaken with the intended operator and users of a community facility to help inform the design and to ensure community facilities are culturally sensitive and reflect the needs of the diverse communities living in the borough.

17.25 Part 3 aims to ensure that new community facilities remain affordable to the community and those facilities which form part of a wider development are designed to facilitate and encourage wider community use and do not look and feel exclusive to the occupants of

the development. Consideration should be given to ensuring that the facility can be easily accessible to a wide range of users.

17.26 Part 4 encourages new development to consider adaptable and flexible design, considering future-proofing new development and pursuing a more sustainable future for the borough by minimising the need for intensive redevelopment if a change of use were to be required in the future to better accommodate the needs of the community. Development proposals should demonstrate that they have factored in adaptability principles in the design process, examples of which include:

- clear structural spans; allowing for wider, more open and flexible interior spaces;
- non-load-bearing and flexible interior partitions,³⁰ which help spatial programs be adapted over time with minimal need to alter the structure of the building, or during the use of the facility as it caters to different needs; and
- sufficient storage provision, allowing different uses to cohabit the provided space.

17.27 Part 5 encourages the provision of primary and secondary schools in appropriate locations, where they meet local need and demonstrate high quality and inclusive design in line with the relevant guidance from the Department for Education, Sport England, and other relevant national governing bodies.

17.28 In order to ensure that education facilities are suitably located, applicants should outline the indicative catchment area for the recruitment of pupils and assess the impact of people (including pupils, parents, carers and staff) arriving and leaving the facility as well as the impact on the highway network and parking facilities.

17.29 Early education and care facilities (see part 6) refer to places where a number of children under five years of age are brought together during part or all of a working day on a regular basis where they can play, learn and receive care (e.g. primary school nurseries, children's centres, pre-school and 'wrap-around' childcare). Demand for these facilities is expected to rise, with the large increase of new homes in the borough as well as an extension in the free statutory childcare provision now covering children from as young as 9-months and increasing the number of hours of care provided. Therefore future provision will increasingly require innovative approaches to the use of land and floor space, for instance, suitable locations for early years could include the ground floor of residential blocks or secondary frontages in existing town centres as well as including the co-location of early education and care facilities with compatible uses, such as primary and secondary schools and office buildings. However, development proposals are still required to meet the needs of young children and promote their development, meeting the spatial requirements set out in the Department for Education's EYFS statutory framework, and demonstrating they are designed and located with the health of young children in mind, away from areas of poor air quality and incorporating easily accessible outdoor space to provide both indoor and outdoor learning opportunities.

17.30 Further and higher education (see Part 7) refers to the stage of education after secondary school and includes a wide range of institutions including universities and colleges (as defined in the glossary in Appendix 1) which provide lifelong learning. It is noted that some further education colleges do include sixth form provision. In order to meet these requirements, the applicant will need to provide evidence of the relevant certification from the Department for Education as well as details of student and staff numbers, enrolment criteria and curriculum

details. Sport and recreation facilities within schools should also reflect Sport England and other relevant national governing body guidance.

17.31 Part 8 supports the use of vacant and meanwhile sites to be utilised for community uses, when it can be shown that the facility is serving an identified need and can be easily accessed. This is a great way of using under-utilised sites to serve a community need, adding life and vibrancy into spaces that would otherwise be vacant and unoccupied. As part of an application for a meanwhile use, the applicant will need to provide a 'move on' plan, which makes arrangements for the facility once the development of the site commences. This should demonstrate that the facility can be re-provided elsewhere within the local catchment area, where the facility serves a local need, or within the borough or London more widely where the need is not local. Alternatively, a 'move on' plan may not be necessary where the applicant can demonstrate that the need is truly temporary.

London Plan policies:

- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- S3 Education and childcare facilities
- S4 Play and informal recreation
- S5 Sports and recreation facilities
- S17 Reducing waste and supporting the circular economy

Local Plan policies:

- TC1 Supporting the network and hierarchy of centres
- PS3 Securing design quality
- PS5 Gender Inclusive Design
- MC2 Active Travel and healthy streets
- BO1 Green and blue infrastructure

Evidence base:

- Planning for Sport Guidance, 2019
- Active Design, 2015
- Health Building Note 00-01, General design guidance for healthcare, 2014
- Baseline designs for schools: guidance, 2014
- Area Guidelines for Mainstream Schools, Building Bulletin 103, 2014
- Tower Hamlets Infrastructure Delivery Plan, 2023
- Planning and Social Cohesion Evidence Base, 2020
- Tower Hamlets Indoor Sports Facilities Strategy, 2017
- London of Borough of Tower Hamlets School Design Guide, 2021
- Tower Hamlets Leisure Facilities Strategy, 2018
- Tower Hamlets Leisure Needs Assessment, TBC
- Physical Activity and Sport Strategy, 2019
- Tower Hamlets Community Facilities Audit, 2023

Policy CI4 Public houses

1. Development proposals for the loss of a public house will not be supported, unless the following can be demonstrated:
 - a. that all reasonable efforts have been taken to preserve the facility as a public house, including evidence of appropriate maintenance and upkeep and efforts to diversify the business;
 - b. that the public house has been marketed for at least 12 months as a public house at a reasonable market rent and free of tie and restrictive covenant and following this exercise there has been no interest in the property and there is no realistic prospect of continuing its current use; and
 - c. that there has been no interest in the property for an alternative community use over a further 12-month period following the marketing period in Part 1(b).
2. Development proposals that include the replacement or re-provision of a public house will be supported where it can be demonstrated:
 - a. adequate floorspace in an appropriate configuration is provided to ensure the continued viability of the public house including any performance or amenity space that can be used for cultural or community uses, and this should not result in a net loss of floorspace unless fully justifiable; and
 - b. the new facility is provided with a sufficient fit out, protecting the character of the pub, so the operation of the new facility remains viable as agreed with the operator of the facility and secured via a planning obligation.

3. Development proposals within the curtilage of a public house must demonstrate that the continued operation and viability of the public house would not be compromised, and demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity to the public house (e.g. providing sufficient sound insulation) in line with the agent of change principle. Loss of converted pubs on the grounds of viability as a result of previous development will not be supported.

Supporting text

17.32 As set out in the Pubs in Tower Hamlets Evidence Base Study, a public house (pub) can be distinguished from a bar based on the following:

- It genuinely has open access to all members of the community (albeit with possible minimum age restrictions) regardless of background and dress code.
- Typically, they will be places that individuals or groups can visit to engage with others and provide an informal meeting place at different times of day or night.
- Bars on the other hand might have more control over who can enter, sometimes through prohibitive pricing or dress code (actual or perceived), be less conducive to holding community meetings, and be geared more towards the 'town centre' night-time economy.

17.33 There is room for discrepancy between these definitions, but the categorisations put forward give a robust basis for assessment. Pubs play a key role in supporting community interaction, often hosting quizzes and live music, showing live sports, offering space for parties and other gatherings, and having links with external clubs and societies.

17.34 In order to satisfy Part 1(b), applicants will need to submit a full detailed marketing report outlining the asking price or rent for the public house and the terms on which it was offered (e.g. freehold or leasehold; whether or not it included living accommodation and whether any part of the property was excluded). The report should include details of any interest in the property, viewings, and why such interest was not taken forward. This information should also be provided for a subsequent



17.35 Like many other London boroughs, Tower Hamlets had witnessed a significant net loss of public houses (otherwise known as pubs) between 2000 and 2020. However, since the introduction of specific planning policies protecting public houses, the rate of decline has been reversed. This policy therefore aims to maintain the greater protection given to the borough's public houses and guard against their unnecessary loss.

17.36 In order to satisfy Part 1(a), applicants seeking to demolish or replace an existing public house will need to provide evidence of appropriate maintenance and upkeep and efforts to diversify the

business. Details of pub accounts for current and previous trading years should also be provided. 12-month period outlining attempts to let the property for alternative community uses as described under Part 1(c).

17.37 Part 2 seeks to avoid future examples in the borough of what are termed 'trojan horse' pubs. This term refers to developments that have met policy requirements through the re-provision of floorspace for pub use but at a level that is insufficient to be practically let as a pub, resulting in a subsequent application to convert the space to an alternative use. This part of the policy seeks to ensure that there is a genuine intention to continue pub use where redevelopment is proposed. It must also be demonstrated that appropriate soundproofing is to be installed to minimise conflict between the pub and any residential use. In order to satisfy this criterion, applicants should submit indicative floorplans demonstrating that, at a minimum, the proposed floorspace for pub use can support a bar area, appropriate seating, storage, toilets and no loss of any additional community and amenity space that could be used for cultural uses.

17.38 Applicants seeking to reduce or remove outdoor space must demonstrate that the remaining space is of sufficient size and quality for the needs of pub users, and that the pub could continue to operate viably following any loss or reduction.

17.39 Where loss or conversion of ancillary function space or living accommodation is proposed, it must be demonstrated that the pub use would not be undermined through such loss. For the loss of function space, evidence is also required to demonstrate the availability of sufficient and suitable alternative facilities available within the local area.

London Plan policies:

- HC7 Protecting public houses
- D13 Agent of Change

Local Plan policies:

- TC1 Supporting the network and hierarchy of centres
- TC2 Protecting the diversity, vitality and viability of our town centres
- TC5 Food and drink
- TC7 Evening and Night-time Economy
- PS3 Securing design quality
- PS6 Heritage and the historic environment
- CG11 Noise and vibration

Evidence base:

- Pubs in Tower Hamlets – Evidence Study, 2017
- Tower Hamlets Pubs Addendum, 2023

Policy CI5 Arts and culture facilities

1. Development proposals which include the loss of an arts or cultural facility will not be supported unless the following can be demonstrated:
 - a. that all reasonable efforts have been taken to preserve the facility in its current use, including evidence of appropriate maintenance and upkeep;
 - b. that the facility has been marketed for at least 12 months as an arts or culture use at a reasonable market rent and free of restrictive covenant and following this exercise there has been no interest in the property and there is no realistic prospect of continuing its current use;
 - c. that there has been no interest in the property for an alternative community use over a further 12-month period following the marketing period in part 1(b); and
 - d. that where an existing Arts and Culture facility caters to a specific community group, this group will not be negatively affected by the loss of the facility.
2. New arts and cultural facilities will be directed towards Town Centre locations, in accordance with the Town Centre Hierarchy and the Strategic Night Time Economy Designations as set out in policy TC1, the Creative Enterprise Zone in Hackney Wick and Fish Island, the Hackney Wick Specialist Centre, Tower Hamlets Activity Areas and the CAZ as identified in the Local Plan:
 - a. major residential, commercial and mixed-use development proposals in these locations should contribute to enhancing the cultural offer of the area and will be encouraged to incorporate arts and culture facilities in the development;
- b. new arts and culture facilities proposed outside of these locations must demonstrate that they are serving a specific need, have been designed with an end user in mind, that their scale is in keeping with the surroundings and that they will be easily accessed by the local community; and
- c. where use of the facility is only intended to operate during evening/night-time hours, potential for allowing daytime uses to activate the space, including on a meanwhile basis, should be investigated.
3. Where an arts or culture facility is replaced or re-provided, the following requirements apply:
 - a. the new facility must remain accessible, affordable and inclusive to the existing community that use the space, ensuring that the new facility remains affordable to the operator, providing evidence of re-provision at the same rent levels and conducting and providing an Equalities Impact Assessment where required;
 - b. evidence of thorough early engagement with the facility operator so the provision of the new facility is an improvement on the existing, enhancing its function and performance and is provided with a sufficient fit out with the development proposal meeting costs of this, so the operation of the new facility remains viable;
 - c. adequate floorspace and volume in an appropriate configuration must be provided to ensure the continued viability of the

facility including any amenity space that can be used for wider community uses, and this should not result in a net loss of floorspace unless justified by demonstrating that the floorspace lost is surplus to need and the loss has been agreed with the operator;

- d. prioritising the existing use staying open until the re-provided facility is operational, and where this is demonstrated to not be possible a local decant strategy is put in place, with costs of this met by the development proposal; and
- e. where a re-provided arts or culture facility that is likely to produce high noise levels is proposed as part of new development, residents should be informed of the normal operation of the noisy use, this can be in the form of an informative as part of the planning permission.

4. Development proposals in proximity to an arts or cultural facility must demonstrate that the continued operation and viability of the facility would not be compromised, and demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity to the facility in line with the agent of change principle. This would include providing enhanced noise mitigation measures for the existing venue as well as providing sufficient sound insulation for the new development.

5. Development proposals for arts or cultural facilities on meanwhile, pop-up or vacant sites where they bring into use vacant developable land on a temporary basis are encouraged and will be supported where:

- a. they are located within a Town Centre location, the Creative Enterprise Zone in Hackney Wick and Fish Island, Tower Hamlets Activity Areas or the CAZ as identified in the Local Plan; or
- b. on sites outside of these locations, they can prove that they are serving a required need, that their scale is in keeping with the surroundings and that they will be easily accessible to the local community;
- c. the proposal can provide evidence of preventing or mitigating any adverse amenity impacts; and
- d. the temporary proposal does not preclude the permanent use of the site for future development.

Supporting text

17.40 Cultural facilities play a key role in developing the borough's vibrancy and character, delivering social value to communities by facilitating social integration, strengthening identities, providing employment, and offering destinations for residents and visitors alike to take part in cultural activities. They also are vital in supporting the creative economy of the borough and contributing to the rich cultural offer in London as a whole. To ensure this vibrancy is retained and grown, it is important that arts and cultural facilities are offered increased support and protection.

17.41 Arts and cultural facilities can be defined as any development where arts and culture is consumed or participated in. Examples of these facilities include theatres, music venues, rehearsal spaces, cinemas, night clubs, galleries, museums, and historic culture sites.

17.42 The London Plan defines arts and culture facilities as spaces where arts and culture are produced, consumed or participated in. for the purposes of this plan, spaces where arts and culture are produced are addressed in the Inclusive Economy and Good Growth chapter. Where there is overlap, and spaces include both production and consumption or participation, both this policy and the policies in the Inclusive Economy and Good Growth chapter will apply.

17.43 The definition of arts and cultural facilities used in this policy includes both charity/not-for-profit organisations, such as theatres, museums and art galleries and for-profit businesses, such as cinemas, nightclubs, and live music venues. It is important to note that this is not an exhaustive list, and other uses may also be considered as an arts or culture facility. More detail on the types of uses that would be considered arts and culture uses, and detailed definitions, are available as part of the GLA's Cultural Infrastructure Dataset.

17.44 In order to satisfy Part 1(a), applications for development resulting in the loss of an existing arts or cultural facility will need to provide evidence of appropriate maintenance and upkeep and efforts to diversify the business.

17.45 In order to satisfy Part 1(b), applicants will need to submit a full detailed marketing report outlining the asking price or rent for the facility and the terms on which it was offered. The report should include details of any interest in the property, viewings, and why such interest was not taken forward. The report should outline comparative rent prices for other arts and culture uses in the area to justify the asking price. This information should also be provided for a subsequent 12-month period outlining attempts to let the property for any alternative community use as described under Part 1(c).

17.46 Part 2 directs new arts and culture facilities to Town Centre locations (having regard to the Town Centre Hierarchy and the Strategic Night Time Economy Designations set out in Policy TC1), the Creative Enterprise Zone in Hackney Wick and Fish Island, the Hackney Wick Specialist Centre, Tower Hamlets Activity Areas and the CAZ. These locations are accessible to the public, will benefit from the vibrancy and vitality created by the addition of arts and culture uses and can support the evening and night-time uses they bring, contributing to the night-time economy.

17.47 Part 2(a) ensures that any major residential, commercial, and mixed-use development in these locations recognises the importance of arts and culture to the area and contributes to the enhancement of culture in the borough. Development is encouraged to provide arts and cultural facilities as part of the contribution to the community, for example by providing a new cultural venue, new studio space, or facilities and space for outdoor cultural events.

17.48 Where arts and culture facilities are only operating in the evening/night-time, Part 2(c) ensures that there is a substantial investigation into allowing an alternative daytime use to co-habit and activate the space on a shared basis. Evidence of this should be provided and demonstrate that inquiries had been made to other cultural or community organisations with explanation as to why this did not progress further if efforts were unsuccessful.

17.49 Part 3 ensures that when an arts or culture facility is re-provided, the new facility remains accessible, affordable, and inclusive to the existing community that use the space, demonstrated that the re-provided facility is rented at the same levels to ensure the continued affordability of the use. The new facility should be an improvement on the existing and should be provided with a sufficient fit out to remain viable for the existing operator, this will be secured via a planning obligation to ensure the cost of this is met by the developer. Early consultation with the existing operator must be conducted to establish the necessary requirements for this and an agreement with the operator must be provided to demonstrate this.

17.50 In line with the agent of change principle, Part 4 of the policy requires any development within the proximity of an arts or cultural facility to demonstrate that the continued operation and viability of the facility would not be compromised, and demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity to the facility. Examples of this would be to provide evidence of sufficient sound insulation in the new development, and where improvements might need to be made on the existing arts and culture facility these will be the responsibility of the new development.

17.51 Part 5 of the policy supports development proposals for arts or cultural facilities on meanwhile, pop-up or vacant sites where they

bring into use vacant developable land on a temporary basis as long as they are within the specified locations in Part 5(a)(i) or can prove that they are serving a required need, that their scale is in keeping with the surroundings and that they will be easily accessible to the local community (Part 5(a)(ii)). They also must prevent or mitigate any adverse amenity impacts (Part 5(b)) and must not preclude the permanent use of the site for future development (part 5(c)). This policy looks to encourage arts and culture facilities on meanwhile, pop-up or vacant sites, as it is recognised that these facilities bring great social, community and place-shaping benefits.

London Plan policies:

- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy
- D13 Agent of Change

Local Plan policies:

- TC1 Supporting the network and hierarchy of centres
- TC2 Protecting the diversity, vitality and viability of our town centres
- TC5 Food and drink
- TC7 Evening and Night-time Economy
- PS3 Securing design quality
- CG11 Noise and vibration

Evidence base:

- Arts and Culture Topic Paper, 2023
- Mayor of London's Culture Strategy, 2018
- London Culture Infrastructure Plan, 2019

18. Biodiversity and open space

BO1 – Green and blue infrastructure

BO2 – Open spaces and the green grid networks

BO3 – Water spaces

BO4 – Biodiversity and access to nature

BO5 – Urban greening

BO6 – Play and recreation spaces

BO7 – Food growing

Introduction

18.1 Tower Hamlets has over 170 publicly accessible parks and open spaces which are a source of local pride, popular with residents and visitors to the borough. Well-designed and accessible green and blue spaces offer many social, environmental, and economic benefits, including:

- enhancing amenity;
- contributing to healthy lifestyles through providing opportunities for active travel and leisure;
- providing sport and recreation opportunities;



- providing places to meet, play, socialise, and access community
- activities and cultural events;
- providing free and accessible spaces for children and young people, adult carers, and vulnerable and deprived people;
- inclusive and supportive of mental health and well-being
- helping to manage storm water drainage and flood risk;
- mitigating the effects of climate change;
- enhancing biodiversity; and
- providing a cooling effect to reduce elevated urban air temperature.

18.2 The overall provision of publicly accessible open space in Tower Hamlets is 260.58 hectares, which equates to 0.84 hectares per 1,000 residents,²⁸ significantly less than the borough's open space standard of 1.2 hectares per 1,000 residents.²⁹ Some parts of the borough are more acutely deficient in access to open space than others - particularly the Isle of Dogs, Shoreditch, and Whitechapel. Across the borough, there is a substantial shortfall in the provision of playing pitches for outdoor sports, as most grass pitches are located at parks or areas of open space where they often serve multiple functions, such as recreational open space and non-sports related activities.³⁰

18.3 Tower Hamlets is a densely populated borough which faces significant development pressure, and there is limited scope to provide major additional open space to accommodate the needs of the growing population, such as new parkland and woodland. Nevertheless, the borough's open spaces make a significant positive contribution to the character and appearance of the borough, reflecting their popularity

²⁸ Based on figure from Open Space Strategy (2017) and 2023 Census population data for the borough

²⁹ Parks and Open Space Strategy, 2017

³⁰ Parks and Open Space Strategy, 2017

among residents and visitors, relatively good condition, and varied use. Some parks (e.g. Victoria Park) are nationally renowned and have been awarded Green Flag status.

18.4 As the population continues to grow there will be an increasing need to protect and revitalise our existing open spaces as well as secure additional publicly accessible open space and our access to these spaces, especially within deficient areas (see Figure 19). Reflecting the limited opportunities for significant new open space, and to ensure residents can enjoy the benefits of urban greening where new open space cannot be accommodated, the greening of council housing stock, estates, existing public realm, and place, and the overall enhancement of these areas, will be prioritised and encouraged.

18.5 Tower Hamlets has access to more water spaces than any other London borough, comprising the rivers Thames and Lea and the other connecting water spaces (e.g. Limehouse Cut, Regents Canal and Hertford Union Canal) as well as several docks and basins. However, much of the potential of the borough's water spaces remains untapped, due to fragmented public access and limited active recreation and leisure opportunities. Tower Hamlets has also experienced significant historic water loss, particularly around Shadwell Basin and the Ornamental Canal, while a considerable amount of water space has been reclaimed and reused to frame development around West India Docks, Blackwall Basin, and Poplar Dock in Canary Wharf. This has further limited the availability of water spaces for recreation, transport, and Despite its urban character, Tower Hamlets has areas of notable biodiversity value, including three Local Nature Reserves and 38 Sites

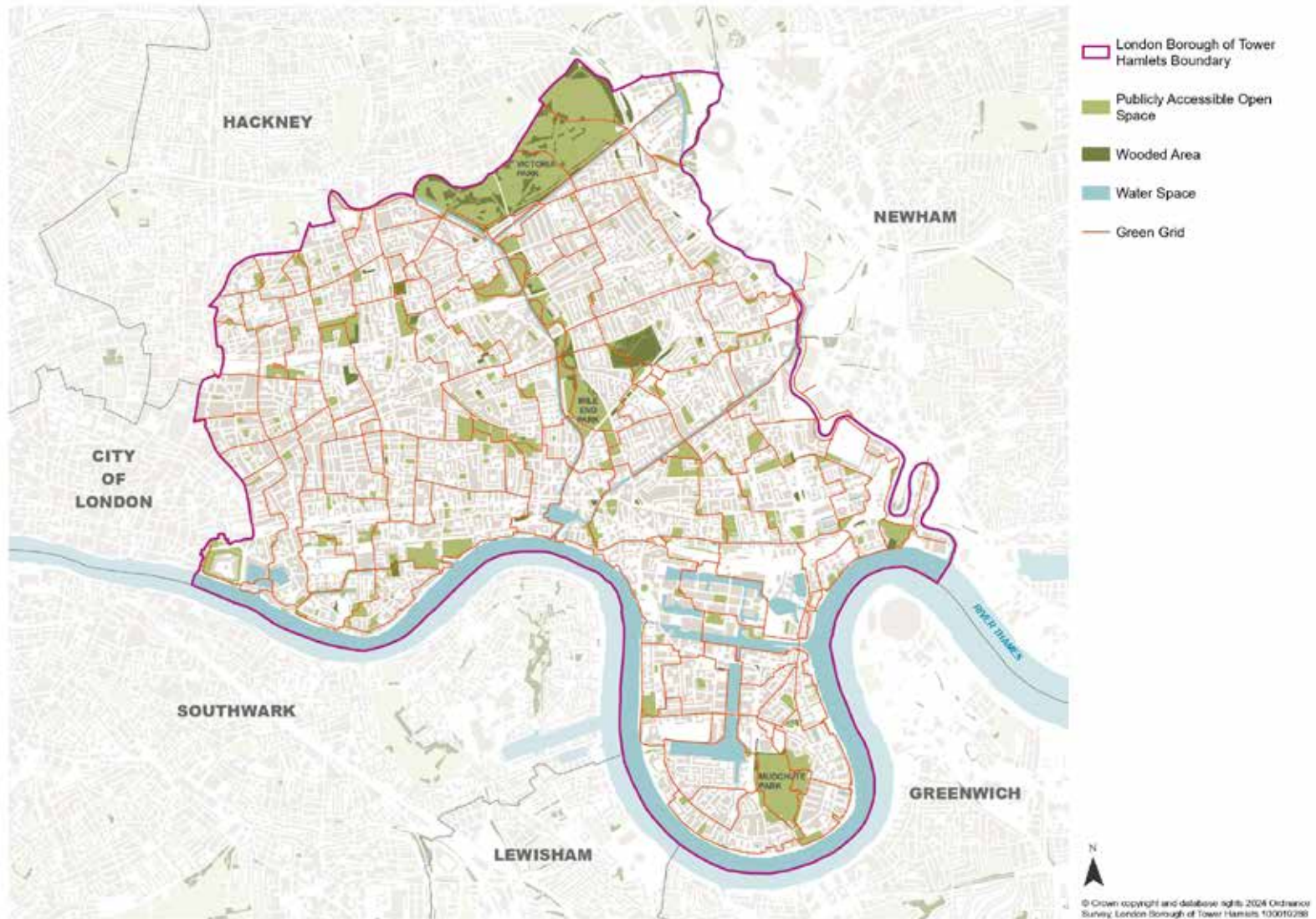
of Importance for Nature Conservation (SINC). However, parts of the borough, including the City Fringe, Poplar, and the western edge of the Isle of Dogs, are considered to be nature deficient³¹.

18.6 This section contains the following policies:

- Policy BO1: Green and blue infrastructure
- Policy BO2: Open spaces and the green grid networks
- Policy BO3: Water spaces
- Policy BO4: Biodiversity and access to nature
- Policy BO5: Urban greening
- Policy BO6: Play and recreation spaces
- Policy BO7: Food growing

³¹ Tower Hamlets Green Grid Strategy (2017)

Figure 18: Network of open and water spaces



Policy BO1 Green and blue infrastructure

Green spaces

1. The council will maintain and enhance the provision of green infrastructure across the borough, delivering an improved network of accessible open spaces through:
- protecting all existing open space to ensure that there is no net loss, except where it meets the criteria set out in Policy BO2;
 - maintaining the open character of Metropolitan Open Land (MOL) in accordance with the London Plan;
requiring strategic development proposals to deliver an increase in new high quality publicly accessible open space on-site, in proportion to the scale of development;
 - improving the quality, value, functionality, and accessibility of existing publicly accessible open space across the borough and neighbouring boroughs, in line with the Green Grid Strategy, Open Space Strategy, Local Biodiversity Action Plan, Sport England's Active Design Guidance, the Tree Management Plan, and through urban greening initiatives detailed in Policy BO5 – especially on council-owned properties where the introduction of additional open space is difficult to achieve;
 - delivering an improved network of green grid links in line with the Green Grid Strategy to ensure:
 - enhanced access to key destination points (neighbourhood parades and town centres, services, community facilities, and publicly accessible open spaces) and to and along water spaces,

- the physical consolidation of open spaces delivered across adjacent sites,
 - Pleasant, sociable green walk ways that enhance the day to day lives of residents with green walking routes, space to exercise, socialize, walk and play with children, improved local commute, access to the positive mental and physical health effects of time spent in nature.
 - spaces are designed to be safe, inclusive, multi-functional and accessible, and
 - ecological corridors for wildlife are provided.
- f. maximising opportunities to create/increase publicly accessible open space with a focus on creating inter-generational activity, a range of activity (including playing pitches and ancillary sporting facilities) with a range of sizes and for a range of users with attention paid to women and girls. Locations identified with the highest level of open space deficiency will be prioritised; and
- g. the delivery of enhanced new strategic publicly accessible open spaces at Lea River Park (including the Leaway) and within site allocations.
2. The council will not support inappropriate development proposals on areas designated as MOL (as shown on the Policies Map).

Blue spaces

3. The council will support the management and enhancement of the existing network of high quality, usable, and accessible water spaces network through:
 - a. protecting the integrity of the borough's water spaces;
 - b. maximising opportunities for enhancing the aesthetic, ecological and biodiversity values of the borough's water spaces (including the immediate and surrounding areas) and the water quality, in line with the Tower Hamlets Local Biodiversity Action Plan;
 - c. improving accessibility and wayfinding to and along water spaces to maximise opportunities for public use and enjoyment;
 - d. promoting water spaces for cultural, recreational and leisure activities that are free or low-cost to use, to ensure they are accessible for all residents and visitors, as well as movement, including passenger and freight transport (e.g. along the River Thames);
 - e. working in partnership with the Port of London Authority and the Canal and River Trust to ensure that residential and commercial moorings are in appropriate locations that do not negatively impact on navigation, water quality, the openness and character of the water space and the amenity of surrounding residents;
 - f. supporting the aims of the Water Framework Directive, Thames River Basin Management Plan, Thames Estuary 2100 Plan including its riverside strategy approach, Thames Vision, and any relevant Marine Plans (e.g. South East Marine Plan); and
 - g. rehabilitating and restoring existing waterways that are neglected or in poor health through measures such as rewilding.

Green infrastructure

4. The council will contribute to nature recovery in Tower Hamlets by protecting and enhancing biodiversity by requiring:
5.
 - a. major development proposals to contribute to the greening of Tower Hamlets by including urban greening and nature-based storm water management as a fundamental element of site and building design; and
 - b. all development proposals to achieve minimum urban greening factor (UGF) and biodiversity net gain (BNG) targets as set out in this plan.

Supporting text

18.7 This policy seeks to protect and enhance the borough's valuable network of green and blue spaces and promote the creation of publicly accessible open spaces which are better connected and provide a wide range of opportunities for local communities and visitors in line with the Open Space Strategy, Green Grid Strategy, and other relevant strategies. It also seeks to protect and enhance the borough's water spaces, which enhance the borough's character, provide open space, recreation opportunities, and significant biodiversity benefits.

18.8 The Open Space Strategy sets out where strategic open space (i.e. one hectare or above) will be provided across the borough. This includes the requirements relating to the provision of playing pitches and a detailed action plan on how our open space priorities will be addressed. Further details on the specific needs and priorities for the provision of playing pitches and outdoor sport facilities are outlined in the Infrastructure Delivery Plan. The Green Grid Strategy identifies opportunities to improve connections between existing open spaces and create smaller scale open spaces in areas of need.

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



18.10 Water spaces make a positive contribution to the economy, society, and the environment, and should be safeguarded for water-related purpose with priority given to water management, improving water quality, managing land drainage, and avoiding, reducing, and managing flood risk. This policy seeks to protect and enhance the borough's valuable network of water spaces and ensure that they are easily accessible and provide a wide range of water-related opportunities for local communities and visitors.

18.11 For the purposes of the Local Plan, water space is defined as an area of water (permanently or intermittently covered by water) and includes rivers, canals, docks, basins, ponds, marshland, and other water bodies.

18.12 Figure 18 illustrates the distribution of publicly accessible open spaces across the borough. Detailed boundaries of the borough's publicly accessible open spaces are shown on the Policies Map. Some of the borough's open spaces and water spaces are designated as Metropolitan Open Land (including East India Dock Basin and Brunswick Wharf, Island Gardens, Lee Valley Regional Park, Meath Gardens, Mile End Park, Mudchute Park, Millwall Park, Tower Hamlets Cemetery and Victoria Park) which form part of London's strategically defined open space network.

18.13 Part 1(a) seeks to protect all open spaces regardless of their size, type, ownership and where access is unrestricted, partially restricted, or restricted.

18.14 Part 1(b) seeks to protect the open character of Metropolitan Open Land (MOL). MOL is a unique open space designation in London and is afforded the same level of protection as the Green Belt within the London Plan.

18.15 Part 1 (c) seeks to ensure that strategic development proposals provide proportional contributions to the borough's network of publicly accessible open space. Such developments will have an impact on the capacity of existing open spaces and must therefore ensure that an increase can reduce the pressure on those spaces. The publicly accessible open space should aim to meet the local standard of 1.2 hectares per 1000 residents (as identified in the Open Space Strategy).

18.16 Certain site allocations (as specified within Section 4 of the plan) will be required to provide a minimum of 1 hectare consolidated open space in order to meet wider strategic needs. Part 2 of policy BO2 (Open spaces and the Green Grid network) outlines the quality and standards required for new and enhanced open space provision.

18.17 Part 1(d) promotes the enhancement of the borough's existing open spaces to improve their quality and multi-functionality to serve a variety of users. This will be delivered through the provision of new outdoor sport facilities, such as playing pitches, outdoor gyms and multi-use games areas within existing parks (e.g. Victoria Park, Mudchute Park and Mile End Park).

18.18 Proposals should also incorporate the principles of Sport England's Active Design Guide.

18.19 Part 1(e) promotes the delivery of a well-connected and high-quality network of publicly accessible open spaces through new and improved green grid connections, in accordance with Transport for London's healthy streets initiative. This can be achieved through new planting in the public realm, creating access to nature, natural play and educational elements along the green grid, as well as improved signage to enhance wayfinding. The Green Grid Strategy has identified a series of strategic green grid projects to improve cross-borough connections and help address deficiencies across the borough as well as other parts of London.

18.20 Parts 1(f) and (g) promote the provision of new publicly accessible open spaces to serve the borough's growing population, particularly where they are of a wider strategic importance (e.g. Lea River Park) and in areas of significant open space deficiency (see Figure 19³²).

18.21 The consolidation of open spaces increases their recreational and biodiversity values. Once the total area of new open space provided across development sites reaches 1ha, this can lead to a reduction in deficiency in access to open space. Locating public realm adjacent to water spaces also expands visual amenity, which is important for general well-being. To ensure new developments achieve these outcomes, development proposals must locate new open space in a manner that enables their expansion – either by situating them next to existing open space on adjacent sites, or in a location where further pieces of open space may be delivered on adjacent sites in future.

18.22 The provision of new or improved publicly accessible open space and green grid linkages will be promoted throughout the borough in accordance with the principles set out in the Open Space Strategy, Green Grid Strategy and Mayor of London's All London Green Grid Supplementary Planning Guidance, notably at the following locations:

- d. Queen Elizabeth Olympic Park (i.e. improving links to open spaces and the Lea Navigation and Hertford Union canals);
- e. Lea Valley (including a series of new open spaces as part of the Lea River Park and a new continuous north-south route through Lea Valley connecting the Lea Valley Regional Park to the River Thames as well as new pedestrian footbridges);

- f. Mile End Park and Victoria Park (including green grid extensions to the existing canal walkways and nearby schools);
- g. Whitechapel (including the delivery of the Green Spine – a new north-south pedestrian route linking Whitechapel District Centre with Commercial Road along with a series of open spaces featuring new public squares behind the proposed civic centre and next to St Augustine with St Philip's Church); and Thames Path (i.e. maintaining and expanding the Thames Path to provide continuous public access to the river).
- h. Larger open space (i.e. one hectare and above) provision will be secured on selected allocated sites (as identified in Section 4) through new development.

18.23 Delivery of smaller publicly accessible open spaces such as pocket parks, nature-based storm water management, and linear verges will be promoted through new development to connect to the green grid. These should be designed in line with Inclusive design principles from Policy P5 and the High Density Living SPD & consider long term stewardship and community inclusion

18.24 Innovative approaches to delivering new open space (e.g. rooftop gardens/greenhouses, community gardens) in these areas as well as locating parks in areas of the borough where accessibility to public open space is poor will be promoted. These areas may be but are not limited those with high densities and tall buildings.

18.25 There is a general presumption against inappropriate development on areas designated as MOL (as shown on the Policies Map).

³² Publicly accessible open space deficiency is mapped using 400 metre catchment areas from parks of 1 hectare or above.



Exceptional circumstances for development proposals on MOL must be demonstrated in line with the requirements set out in the NPPF.

18.26 Part 3(a) seeks to ensure that development does not result in further loss or over sailing of the borough's valuable water spaces unless it is a water dependent use at appropriate locations. Water-dependent uses are defined as an activity which can only be conducted on, in, over or adjacent to the water because its function requires direct access to, along and across the water or involves, as an integral part of the activity, the use of the water. Appropriate infrastructure to support water-dependent uses includes:

- a. walkways and slipways for pedestrians, boaters and cyclists;
- b. bridges and tunnels (e.g. across the rivers Lea and Thames);
- c. water-based sport and leisure (e.g. sailing and kayaking);
- d. security and safety (e.g. lifebuoys and other life-saving equipment);
- e. water-based passengers, tourism, transport support and freight infrastructure (e.g. piers and clippers);
- f. marine support facilities;
- g. moorings (including permanent and visitor moorings) and their support infrastructure; and
- h. flood defences and their strengthening and raising in line with the TE2100 Plan.

18.27 In addition, other water-related uses may also be considered at suitable locations where there is clear evidence that they are specifically designed to enhance the public access, use or enjoyment of the water space and will have a positive contribution to the character of the water space without causing any adverse negative impacts on biodiversity or flood risk (e.g. activate the water space to enhance it as a waterside destination). An important consideration in decision making will be the cumulative impact of existing and proposed new water related uses to ensure that that there is no adverse impact on the character and openness of the borough's water space and the amenity of surrounding residents.

18.28 Despite their urban setting and heavily modified nature, the borough's network of rivers, canals and docks are important for



biodiversity, supporting a wide range of species of wild plants and animals (including rare and protected species) and allowing people to come into contact with nature. In accordance with part 3(b), development will be expected to preserve and enhance biodiversity and increase the resilience of wetland ecosystems. This can be achieved through a range of measures, including the restoration and creation of priority habitats, planting native species along the waterways to create more natural landscapes, and preventing overspill of artificial lighting and excessive shade onto water bodies and adjacent areas of soft landscaping to protect the ecosystems' natural patterns of activity.

18.29 Some of the borough's water spaces are difficult to find and access from nearby transport hubs (e.g. River Lea, Shadwell Basin and West India Middle and South Docks) or have restricted and disjointed access (e.g. River Thames). Part 3(c) of the policy seeks to ensure that access to all water spaces is improved through appropriate signage for better way finding. Many of the borough's water spaces (including Blackwall Basin, Hermitage Basin, Limehouse Basin, East India Dock Basin, Limehouse Cut Canal, Millwall inner and outer docks, Poplar Dock, St Katherine's Dock, Wapping Canal, West India Docks and the rivers Lea and Thames) are located within or adjacent to areas of open space deficiency. These water spaces and the adjacent land therefore provide important open space functions and make a valuable contribution to the health and well-being of communities.

18.30 In delivering Part 3(d), additional opportunities will be explored to maximise the use of the borough's water spaces for transport and freight at suitable locations (e.g. Trinity Buoy Wharf and along the River Thames), including the introduction of additional Thames Clipper stops. Policies MC1 and MC4 provide further guidance on sustainable transport and freight.

18.31 Creating and enhancing the borough's high quality, usable and accessible network of water spaces will be delivered through a coordinated approach with a wide range of stakeholders, including the Canal & River Trust, Port of London Authority, Inland Waterways Association, the Environment Agency, neighbouring boroughs, and other relevant organisations, see parts 3(e) and (f).

18.32 This policy also recognises the importance of several strategic documents which provide the framework for the sustainable development of the borough's water spaces and, more specifically, the river Thames and its tributaries (see Part 1(f)).

- a. The Water Framework Directive provides a framework for protecting and improving the ecological quality of all water bodies.
- b. Following on from the Water Framework Directive, the Thames River Basin Management Plan sets out actions to protect and enhance the river's natural environment.
- c. The Thames Strategy East sets out a long-term framework to guide the sustainable management of the Thames Policy Area (as shown on the Policies Map) and promotes development principles, such as greater connectivity through improved foot and cycle access to and along the river Thames and the provision of water support infrastructure (e.g. bridges, piers, and flood defences, etc) which respects and contribute to the river's character.
- d. The Thames Estuary 2100 Plan sets out a comprehensive action plan to manage tidal flood risk across the River Thames and the River Lea including the raising of defences by the riparian owners, which will require adaptation of the adjacent public realm.
- e. The Thames Vision sets out the goals and priority actions to help manage and promote the river Thames, which include: more trade

and more jobs associated with the river; improved use of the river for the transportation of passengers and freight; and an improved environment and river heritage.

- f. Tower Hamlets falls within the remit of the Marine Plan for the South East inshore area. Adopted in 2021, the Marine Plan for the South East seeks to enhance and protect the marine environment and achieve sustainable economic growth and marine development and applies when development proposals include a section of coastline or tidal river. The detailed boundaries of the Marine Plan for the South East inshore area (within the borough) are shown on the Policies Map. Any development and activities within the rivers Thames and Lea should policies set out in the South East Marine Plan.

18.33 Tower Hamlets has a diverse range of sites of biodiversity value, including areas of open space, waterways, and formally designated Sites of Importance for Nature Conservation (SINCs). Part 4 recognises that development can contribute to enhancing the borough's biodiversity through urban greening measures. The London Plan establishes the Urban Greening Factor model to determine the appropriate provision of urban greening for new developments.

London Plan policies:

- G1 Green infrastructure
- G2 London's Green Belt
- G3 Metropolitan Open Land
- G4 Open Space
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- G8 Food growing
- S14 Waterways – strategic role
- S16 Waterways – use and enjoyment
- P7 Protecting and enhancing London's waterways

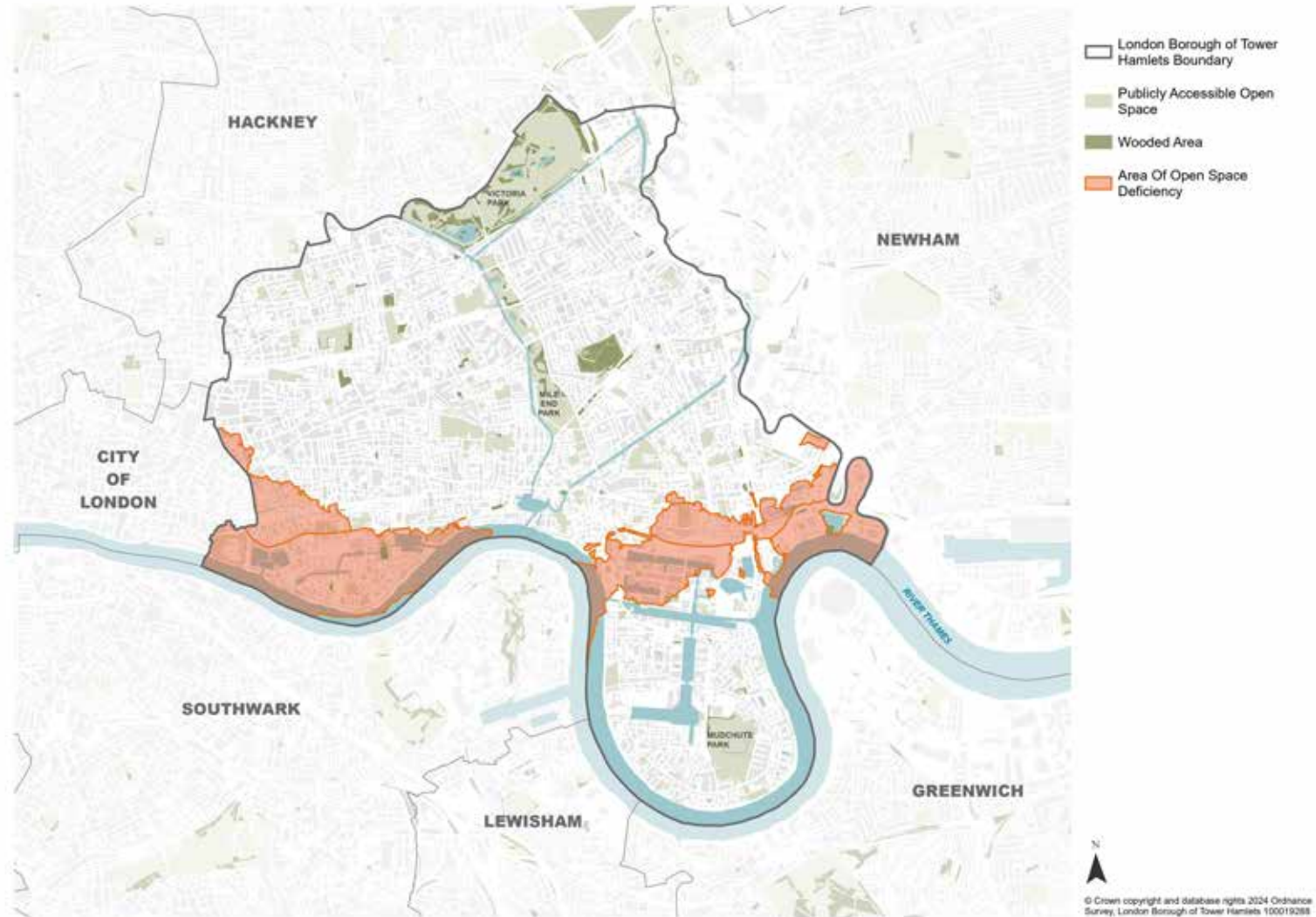
Local Plan policies:

- DV2 Delivering sustainable growth in Tower Hamlets
- DV3 Health impact assessments
- DV5 Developer contributions
- PS1 Design-and Infrastructure-led approach to development
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- HC10 Housing standards and quality
- Cl1 Supporting community facilities
- CG1 Mitigating and adapting to a changing climate
- CG7 Managing flood risk
- CG8 Sustainable drainage
- CG9 Water efficient design
- MC1 Sustainable travel
- MC2 Active travel and healthy streets

Evidence base:

- Tower Hamlets Open Space Strategy, 2017
- Tower Hamlets Water Space Study, 2017
- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- Tower Hamlets Local Biodiversity Action Plan, 2019
- All London Green Grid Supplementary Planning Guidance, 2012
- Active Design Guidance, 2023
- Tower Hamlets Playing Pitch Assessment, 2017
- High Density Living Supplementary Planning Guidance, 2020

Figure 19: Areas of open space deficiency



Policy BO2 Open spaces and the Green Grid network

1. Development proposals on areas of open space (excluding MOL) will only be supported in exceptional circumstances where they:
 - a. provide essential facilities that enhance the function, use and enjoyment of the open space (e.g. ancillary sport facilities to the playing field use); or
 - b. demonstrate they achieve a higher quality of open space, by meeting specific criteria which sets out appropriate and acceptable improvements;
it is an outdoor sport and recreational space or facility, the sporting and recreational benefits of which would outweigh the harm resulting from its loss; and
 - c. in any of the circumstances described in parts 1(a), (b), and (c), it is demonstrated that it will not result in any adverse impacts on the existing ecological, heritage or recreational value of the open space and the flood risk levels within and beyond the boundaries of the site.
2. Major development proposals should contribute to the delivery of new or enhanced publicly accessible open space on-site which should:
 - a. be visible and accessible from the public realm surrounding the site;
 - b. be of a high quality and inclusive design that complements local character
 - c. provide facilities to promote active recreation

- d. and healthy lifestyles, including facilities like sport pitches, playgrounds, and outdoor gyms;
- e. be well-connected and way-marked to other open spaces, in accordance with the Green Grid Strategy and Open Space Strategy;
- f. be consolidated and facilitate potential future extensions of open space on adjacent sites;
- g. remove existing barriers such as gates to and fences around green spaces and remove steps or other impediments to accessibility;
- h. contribute towards meeting the demand that they generate through the provision of on-site sport facilities and/or providing additional capacity off-site;
- i. incorporate soft landscaping, shading, and sustainable drainage systems consistent with Policy CG8;
- j. enhance biodiversity, contributing to the objectives identified in Policy BO4 and the Local Biodiversity Action Plan;
- k. be designed to be enjoyed by people of all ages, gender identities, and physical abilities, with adequate facilities and amenities such as toilets, water fountains, seating and picnic areas, lighting and wayfinding signage, accessible footpaths, nature or running trails;
- l. integrate play and space for informal recreation as per requirements set out in Policy BO6; and
- m. integrate food growing opportunities, where feasible and practical as per Policy BO7.

3. Development proposals should not solely rely upon existing publicly accessible open space to contribute towards on-site communal amenity space and child play space.
4. Development proposals should not adversely impact the enjoyment, openness, ecological and heritage value of the borough's publicly accessible open spaces.
5. Major development proposals adjacent to the existing and proposed Green Grid network must contribute to the expansion and the enhancement of Green Grid links to connect communities to publicly accessible open spaces and water spaces as well as other main destination points, such as town centres, schools, health facilities and transport hubs.
6. Development proposals adjacent to the existing and proposed Green Grid network must demonstrate that they will not have adverse impacts on the access, design, usability, biodiversity, and recreational value of the green grid network.
7. Development proposals that provide community allotments, gardens, greening, and pocket parks will be encouraged, particularly where they bring into use vacant developable land on a temporary basis or as part of a meanwhile use.

Supporting text

18.34 This policy aims to ensure that development proposals do not negatively impact the existing network of publicly accessible open space and contributes to its expansion and enhancement. It also seeks to maximise the opportunities for delivery of new open space and for enhancing accessibility and connectivity to the wider network, which is considered crucial to addressing the borough's open space deficiency (as shown on Figure 19).

18.35 Development proposals on areas of open space will be resisted unless in the circumstances specified in part 1. The types of development that are considered to be acceptable in principle within areas of open space include changing rooms, play equipment and seating. They should be of a scale and function proportionate to the open space in which they are to be located and should be purely ancillary to it.

18.36 In relation to part 1(b), the starting point for all development proposals will be no net loss of open space, and any development proposal resulting in an increase in population will be required to provide an amount of open space in accordance with the principles set out

18.37 in Policy BO1. However, there may be certain circumstances (e.g. in housing estate regeneration schemes) where building on fragmented, unused, and poor quality open space enables the provision of a larger, consolidated, and enhanced area of open space which is more usable for the local community and provides better urban greening and biodiversity outcomes than the existing open space.

18.38 For a net loss of open space to be considered, the development proposal must demonstrate it will achieve the above by successfully consolidating smaller and less functional areas into a larger open space

and delivering as many of the following enhancements as possible, including:

- a. improving the openness and passive surveillance of a green space;
- b. removing barriers such as fences or steps to make green spaces more welcoming, usable, and accessible, with better connections through or across sites;
- c. introducing furniture or features such as benches, seating and tables, drinking fountains, planter boxes for food growing, waste bins, lighting, and signage;
- d. the installation of new or replacement of dilapidated play equipment, public toilets, fitness equipment, public art, or other such facilities;
- e. installing bird and bat nesting boxes, planting appropriate species, and other interventions that provide maximum benefit for biodiversity, and exceeding minimum requirements detailed under Policy BO4; and
- f. installing nature-based SuDS to manage rainfall and reduce surface water run-off.

18.39 Part 1(c) allows for provision of outdoor sport and recreation facilities on open space in circumstances where the public benefit from the facility outweighs the harm from the loss of openness. This recognises the value of recreational facilities to residents of the borough and their importance to health and well-being and acknowledges that there are likely to be few sites in the borough that would be suitable for outdoor sports and recreation facilities that are not designated open spaces.

18.40 Part 1(d) seeks to ensure that where they are determined to be acceptable on other grounds, development proposals on open space do not compromise other significant features of the site or increase the level of flood risk as a result of developing open space.

18.41 Part 2 seeks to promote delivery of new publicly accessible open space and, in particular, the provision of new publicly accessible open space on major schemes (between 10-100 residential units or between 1,000-10,000 square metres floor space) and strategic schemes (more than 100 homes or over 10,000 square metres floor space), or where development is considered to place significant additional demand on existing publicly accessible open space, particularly in identified areas of open space deficiency (see Figure 19).

18.42 Where publicly accessible open space is provided on site, it should aim to meet the local standard of 1.2 hectares per 1000 residents (as identified in the Open Space Strategy). New publicly accessible open space will be expected to meet the design criteria in part 1. Notwithstanding, given the extent of residential development required and forecast for the borough, development proposals that maintain the existing 0.84ha per 1,000 residents standard will be considered. Reflecting the limited opportunities for significant new open space, and to ensure residents can enjoy the benefits of urban greening where new open space cannot be accommodated, the greening of council housing stock, estates, existing public realm, and place, and the overall enhancement of these areas, will be prioritised and encouraged.

18.43 Future management and maintenance of new publicly accessible open space will be secured through planning conditions or legal agreements to ensure the highest possible level of public access, function, and use.

18.44 The provision of amenity space or landscaping required as part of good design to mitigate the impact of development will not be counted towards the provision of appropriate publicly accessible open space. The level and nature of any sports provision should take account of the recommendations set out in Sport England's guidance and our Open Space Strategy and its associated action plan.

18.45 Where on-site provision of adequate publicly accessible open space is not possible, a contribution will be sought from the developer towards the delivery of the opportunities and the strategic projects identified in the Open Space Strategy and Green Grid Strategy in accordance with the Planning Obligations SPD.

18.46 Part 3 seeks to ensure that residential developments will not place undue pressure on publicly accessible open space and will not be allowed to solely rely upon nearby public open space to contribute to adequate outdoor communal amenity space, including child play space in line with the principles set out in Policy BO6.

18.47 In accordance with part 4, development will be expected to demonstrate that it will enhance and not negatively affect the borough's publicly accessible open space, including the Lee Valley Regional Park (consisting of East India Dock Basin and linear towpaths along the River Lea Navigation, Hertford Union Canal and Limehouse Cut) the Lea River Park (including the Leaway) and TfL's Lea Valley Walk initiative.

18.48 The Lee Valley Regional Park forms an important part of the borough's green grid and water spaces network and has the potential to contribute to creating healthy and liveable communities, particularly where links into this network can be enhanced and complemented with new open space delivered as part of development. The Lee Valley Regional Park Authority is a statutory authority, with responsibilities to either provide directly or work with partners to provide facilities

for sport, recreation, leisure, entertainment, and nature conservation throughout the park. As such, the council will work together with the Lee Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets' Local Biodiversity Action Plan and the Park Development Framework where they relate to the borough. We will also work with neighbouring authorities and relevant stakeholders to support the delivery of the Lea River Park (including the Leaway), which connects Queen Elizabeth Olympic Park and the Lee Valley Regional Park to the Royal Docks and the River Thames through a new continuous walking and cycling route along the River Lea. Further development principles and guidance are included in the Lea River Park Primer and Lea River Park Design Manual.

18.49 Parts 5 and 6 require development proposals located adjacent to the green grid (i.e. within the Green Grid Buffer Zone, (as shown on the Policies Map) – including the Lee Valley Regional Park, Lea River Park, Thames Path National Trail and canal towpaths – to contribute to linking and improving the connectivity of green grid links in accordance with the Green Grid Strategy and the Mayor of London's All London Green Grid Supplementary Planning Guidance. This should be supported with adequate signage and facilities for visitors and tourists. Public realm improvements will be considered on a case-by-case basis and may include:

- a. new or enhanced/widened footpaths or cycleways;
- b. road realignment;
- c. street crossings or other safety measures;
- d. cycle parking including space for cycle hire;
- e. external lighting;

- f. landscaping;
- g. tree planting or other urban greening measures;
- h. drinking water fountains;
- i. public conveniences;
- j. electrical connection points for concessions; and
- k. way-finding signage.

18.50 Opportunities should be sought to improve the quality of TfL signed cycle routes, in line with the London Cycle Design Standards (2017) and TfL's New Cycle Route Quality Criteria (2019) and Policy MC2. Part 7 encourages the creation of community allotments, gardens and pocket parks which promote healthier lifestyles and greater social interactions.

Page 3 of 4

London Plan policies:

- G1 Green infrastructure
- G2 London's Green Belt
- G3 Metropolitan Open Land
- G4 Open Space

Local Plan policies:

- DV2 Delivering sustainable growth in Tower Hamlets
- DV3 Health impact assessments
- DV5 Developer contributions
- PS1 Design-and Infrastructure-led approach to development
- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- HC1 Meeting housing needs
- HC10 Housing standards and quality
- Cl1 Supporting community facilities
- CG1 Mitigating and adapting to a changing climate
- MC1 Sustainable travel
- MC2 Active travel and healthy streets
- MC5 Sustainable delivery, servicing, and construction

Evidence base:

- Tower Hamlets Open Space Strategy, 2017
- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- All London Green Grid Supplementary Planning Guidance, 2012
- Active Design Guidance, 2023
- Tower Hamlets Playing Pitch Assessment, 2017

Policy BO3 Water spaces

1. Development proposals in, adjacent to, or affecting the borough's water spaces must:
 - a. not result in loss or covering of the water space or harm the openness of the water space, unless it is a water-related or water-dependent use at appropriate locations and of appropriate scale;
 - b. not result in adverse impacts on the existing water spaces network, including navigation, biodiversity, water quality, visual amenity, character and heritage value of the water space, taking into consideration the adjacent land and the amenity of existing surrounding developments;
 - c. not adversely impact other existing active water uses;
 - d. enhance the ecological, biodiversity and aesthetic quality of the water space, responding appropriately to the setting of the adjacent land area, in line with the Tower Hamlets Local Biodiversity Action Plan, the Water Framework Directive and the Thames Tidal Masterplan: Tower Hamlets and Newham;
 - e. activate riverbanks and dock edges, and provide improved amenity space, increased opportunities for public access, and use of the water space for water-related uses and sport and recreational activities (where appropriate, and where proposals do not adversely impact the biodiversity, ecology, or health of the water space) in line with the TE2100 riverside strategy approach;

- f. improve the safety and accessibility of the borough's water spaces, consistent with requirements set out in the Port of London Authority's guidance 'A Safer Riverside'(where appropriate to the waterspace). This should include provision of riparian lifesaving equipment where necessary (such as grab chains, access ladders, and lifebuoys) where appropriate, improved lighting and wayfinding, and managing competing spaces between users;
- g. respond positively and sensitively to the setting of water space, while respecting and animating water space to improve usability and safety;
- h. provide suitable setbacks from water space edges to allow maintenance of defences, which mitigate flood risk, emergency access, future upgrades to flood defences and river banks and to allow riverside walkways, canal towpaths and cycle paths for equal access, where appropriate; and
- i. where relevant, contribute to the restoration of river channels and water spaces through rewilding and re-naturalisation.
- j. not involve the culverting of a watercourse, development proposals should actively seek to de-culvert and provide better provision of daylight exposure to a waterbody wherever possible, developers should consider opportunities for removal of toe-boarded watercourses. Development proposals within the Thames Policy Area (as shown on the Policies Map) are required to consider the guidance provided within the most up-to-date Thames River Basin Management Plan and the relevant Southeast Marine Plan, where applicable.

2. Development proposals adjacent to and along the borough's water spaces are required to integrate with and enhance the waterside environment, including improving the area's links with the water space, contribute to the delivery of continuous walkways, canal towpaths and cycle paths where appropriate (e.g. completion of the Thames Path), and consider flood defence raising and the management of historic wharves in line with TE2100 riverside strategy approach.

3. Development proposals for eco-moorings will be considered acceptable at suitable locations, and where they do not cause any adverse impact on navigation, biodiversity, microclimate, safety, amenity of surrounding residents and the public enjoyment of the water space.

Supporting text

18.51 This policy provides details of how the borough's water spaces will be protected and how the various functions they offer are maintained and enhanced.

18.52 Part 1 requires development to demonstrate that it will not result in loss or covering of water space and that it will not compromise the suitability of the water space for water-related uses (as defined in Policy BO2). Further water loss and over-sailing from development will be resisted throughout the borough, particularly at locations that have experienced significant water space loss, such as West India South Dock, West India Middle Dock, West India North Dock, Blackwall Basin, and Poplar Dock in Canary Wharf.

18.53 In line with London Plan policies and guidance, provision of appropriate water space support infrastructure (including but not limited to: transport and essential access infrastructure into and alongside water spaces, boatyards, eco-moorings, jetties and safety equipment) will be supported at suitable locations. Further details on infrastructure for water-related and water-dependent uses are included in Policy BO2. The Infrastructure Delivery Plan provides information on the current need for some water support infrastructure (e.g. bridges).

18.54 The sense of openness greatly contributes to a person's perception and enjoyment of water spaces. This is of particular importance in a borough like Tower Hamlets where there is a high deficiency of open space. When assessing planning applications, consideration will be given to the water coverage and human experience of the open character of water space in terms of its visibility and visual connections across the water from the surrounding public realm (see part 1(a)).



18.55 Tower Hamlets benefits from its location on the rivers Thames and Lea, and its many basins and canals. The health, navigability, character, and heritage of the borough's water spaces are ongoing function, including their use for social, leisure, economic, and cultural purposes. Development proposals should seek to protect and enhance water networks within the borough, their settings, and the amenity of adjacent developments, and not compromise existing water-based operations or uses (see parts (b) and (c)).

18.56 The ecology and biodiversity of the borough's water networks as well as their appearance and surroundings are crucial to their ongoing health and public enjoyment of these areas.

18.57 Biodiversity Action sets out measures to enhance rivers and waterways, including controlling invasive species, providing vegetation on river walls or on floating rafts, encouraging schemes to improve water quality, and increasing habitat. The Water Framework Directive focuses on ensuring good qualitative and quantitative health of water bodies, including reducing and removing pollution, and ensuring there is enough water to support wildlife at the same time as human needs (see part 1(d)).

18.58 Where a Water Framework Directive assessment is required to undertake works on or adjacent to a watercourse, the developer is required to contact the Environment Agency and provide information to demonstrate that the Water Framework Directive objectives can be met or to otherwise justify the development.

18.59 Public access to and along the borough's water spaces will be improved, particularly where access is currently restricted, including the docks around Canary Wharf (including West India Middle Dock and Blackwall Basin), the river Lea and the river Thames (e.g. the Thames Path) (see Part 1(e)).

18.60 Safety and public use of the borough's water spaces will be improved through development design which provides good pedestrian access, active frontages to improve surveillance and riparian lifesaving equipment, where appropriate. Increased appeal through active frontages will be particularly important for the docks in Canary Wharf as well as areas around Trinity Buoy Wharf, Limehouse Basin and along the river Lea which can have significant potential to attract visitors (see part 1(f)).

18.61 The edges of water space are an extremely important part of the functioning of water space as ecosystems, open space, and transport networks. Development proposals must ensure that such areas are protected and provide setbacks from the edges of the water space as well as contribute to restoration following the Environment Agency's Estuary Edges guidance. How this restoration should be undertaken will need to be considered against the functions of the water space and an appropriate balance will be sought between uses on the water space and access to and interaction with the water space and ecological enhancements in line with the Tower Hamlets Local Biodiversity Action Plan. Setbacks from waterways are also required for flood management purposes and further details outlining their use are provided in Policy CG2. Where setbacks are required they provide an opportunity to increase enjoyment of the waterways and should be designed to look and feel publicly accessible (e.g. through the use of signposting) (see paragraph 18.61h)).

18.62 The river Thames provides important additional opportunities to that of other water spaces within the borough, acting as a transport link of strategic and historical importance. Developments in the Thames Policy Area (as identified on the Policies Map) should ensure that their use and design establishes a positive relationship with the river in accordance with the most up-to-date guidance within the

18.63 Thames Policy Area (e.g. Thames Strategy East and Thames River Basin Management Plan) and supplementary planning documents (see Part 2).

18.64 Part 3 promotes the improved public access to and along the borough's water spaces, particularly where it is currently restricted, partially restricted or fragmented (e.g. along the River Thames, the River Lea and the docks around Canary Wharf, including West India

Middle Dock and Blackwall Basin). The Thames Path forms part of the National Trail. We are committed to maintaining the existing National Trail and expanding the Thames Path along the eastern part of the Isle of Dogs to connect it to the Leaway as a publicly accessible continuous route. Developments adjacent to the river Thames should contribute towards the delivery and maintenance of this route. This will be secured by planning obligation. Where the Thames Path cannot be delivered adjacent to the river Thames, due to heritage reasons, we will require the development to contribute towards the signposting, design and maintenance of an alternative route.

18.65 Wharves and terminals with limited accessibility also pose a challenge to finding appropriate routes. It is encouraged that developers consider pragmatic solutions which would allow for safer access around these sites.

18.66 The TE2100 Plan sets out the raising of flood defences by up to 500mm by 2050 and a further 500mm by 2090. Having monitored sea level rise, the Environment Agency has moved the earlier deadline forward by 15 years to accommodate the higher level of rise that has occurred, when compared with what was modelled when the Plan was first produced. Further changes are anticipated as the effects of climate change manifest themselves. It is clear though, that the raising of defences will have significant implications for riparian owners and the environment and development adjacent to rivers. A Riverside Strategy will be developed before 2034 and detail approaches to defence raising, including the defences provided to historic wharfs.

18.67 However, riparian owners are advised that any works on riparian sites and to river defences in advance of the Strategy, need to include clear plans for raising and strengthening defences and ensuring that these do not reduce the amenity value of the riverside environment.

18.68 The council will work together with the Port of London Authority and Canal and River Trust to determine the suitability of moorings (including residential and commercial moorings) on the borough's water spaces. Key considerations in assessing the impact of mooring proposals will include: navigation, water quality, biodiversity, openness and character of the water space and surrounding area, surrounding residential amenity, waste management and air quality as well as the adequate supply of electricity provision. All sites adjacent to waterways should investigate the opportunity to provide residential moorings and should engage with the Canal and River Trust early in the planning process'. The Tower Hamlets Water Space Study identifies some of the locations which may be considered suitable for further development of residential moorings. Development proposals for permanent eco-moorings will be considered acceptable at suitable locations, including Regents Canal, Blackwall Basin, Poplar Dock, Millwall Inner and Outer Docks and the West India South Dock and where they do not cause any adverse impact on navigation.

London Plan policies:

- S14 Waterways – strategic role
- S16 Waterways – use and enjoyment
- S17 Protecting and enhancing London's waterways

Local Plan policies:

- DV5 Developer contributions
- PS1 Design-and Infrastructure-led approach to development
- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- CG1 Mitigating and adapting to a changing climate
- CG7 Mitigating flood risk
- CG8 Sustainable drainage
- CG9 Water efficient design
- MC1 Sustainable travel
- MC2 Active travel and healthy streets
- MC5 Sustainable delivery, servicing, and construction

Evidence base:

- Tower Hamlets Water Space Study, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- Tower Hamlets Local Biodiversity Action Plan, 2019
- Thames Estuary 2100 (TE2100) Plan, 2023

Policy BO4 Biodiversity and access to nature

1. Development proposals must protect and enhance biodiversity and contribute to nature recovery in the borough through:
 - a. protecting and retaining existing habitats and features of biodiversity value. If this is not possible, these features must be replaced within the development, and additional measures must be incorporated to enhance biodiversity, proportionate to the development proposed;
 - b. maximising the provision of 'living building' elements to provide opportunities to create new onsite habitats, including integral nest boxes; and
demonstrating that the development does not have an adverse impact on open spaces, including watercourses and water bodies and their hydrology.
2. Development proposals for all major development, and minor developments which are not exempt from mandatory Biodiversity Net Gain under national guidelines, must deliver Biodiversity Net Gain (BNG).
 - a. The BNG benchmark is a minimum 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric and secured in perpetuity (at least 30 years);
 - b. Minor development that is exempt from mandatory BNG will be

expected to deliver biodiversity enhancement in line with the Local Biodiversity Action Plan, appropriate to the scale of the development.

- c. Where BNG requirements for a 10% minimum gain cannot be met on site, unless the development is exempt from mandatory BNG under national guidance, they will need to be offset via the purchase of offsite biodiversity units, secured through section 106 planning obligation or planning condition.
3. Major development is required to submit an ecology assessment demonstrating biodiversity enhancements that contribute to the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and the Thames River Basin Management Plan.
 4. Development proposals must not negatively impact on any designated European site such as Special Protection Areas, Special Areas of Conservation or Ramsar sites. Developments which might have the potential to adversely impact a Special Protection Area or Special Area of Conservation outside the borough will be required to submit a Habitat Regulations Assessment.
 5. Development proposals must avoid harm to biodiversity. In line with London Plan Policy G3 (Biodiversity and access to nature), where it is demonstrated that harm to a Site of Importance for Nature Conservation (SINC) or the population or conservation status of a protected or priority species is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy must be applied to minimise impacts:

- a. avoid damaging the significant ecological features of the site;
 - b. Where avoidance is not possible, proposals must minimise and mitigate the impact to the biodiversity interest by improving the quality or management of the rest of the site; and
 - c. as a last resort for exceptional cases, deliver off-site compensation of better biodiversity value.
6. Planting and landscaping around developments must not include 'potentially invasive non-native species' or plants known to produce nectar that is toxic to bees. Invasive non-native species listed in Schedule 9 of the Wildlife and Countryside Act must be controlled, and eradicated where possible, as part of redevelopment.



Supporting text

18.6g While Tower Hamlets is a densely built-up urban area, it nevertheless is home to a diverse range of flora, fauna, and different habitats of biodiversity value, including areas of open space, waterways and formally designated Sites of Importance for Nature Conservation (SINCs). There are two Local Nature Reserves in the borough at Mudchute and Tower Hamlets Cemetery Park.

18.70 Living building elements can enhance biodiversity, both directly through planting and indirectly through providing habitats. They also have flood reduction, climatic and air quality benefits, helping to remove carbon dioxide from the air and reduce temperatures.

18.71 In implementing Part 1(a), consideration will be given to the size, scale and nature of the development, and whether an appropriate level of provision is proposed. Even minor development, such as rear extensions, have the ability to provide biodiversity measures through features such as living roofs, walls, habitat structure (e.g. bat and bird boxes).

18.72 In implementing Part 1(b), 'living building' elements need to contribute to local biodiversity through providing priority habitats, and/or features for priority species, as identified in the latest Tower Hamlets Local Biodiversity Action Plan. The types of 'living building' techniques we consider appropriate include living roofs, walls, terraces, and other building greening techniques.

18.73 Swift bricks or nest boxes that meet the requirements of the British Standard BS 42021:2022 for nest boxes should also be provided in all new developments for swifts and other small birds at 5m or greater in height to the eaves. Built-in swift bricks are preferred to external boxes



as they are integrated into the building, cannot be removed, provide better temperature control and require less maintenance. Unless circumstances make the swift brick or similar product impractical, this system should be chosen over external nest boxes. For minor developments, the minimum number of swift boxes required on residential development is three, or two per residential unit, whichever is greater (noting it is not necessary that two boxes are placed on each unit, but that the equivalent number should be applied across the development). For major developments specific requirements will be recommended by the ecology advisor. The requirement will be secured by attaching a condition to planning consents.

18.74 'Living building' elements should also be considered alongside the sustainable urban drainage system requirements outlined in Policy CG8, and green grid requirements outlined in Policies BO1 and BO2. Providing living building elements is considered particularly beneficial in areas of sub-standard air quality or in areas at particular risk of experiencing the urban heat island effect, or the phenomenon of urban areas generating their own microclimates resulting in significantly higher temperatures than surrounding rural areas. The risk of experiencing the urban heat-island effect should be considered over the lifetime of the development. Details of ongoing maintenance of the 'living building' elements will also be required.

18.75 Areas at particular risk of experiencing the urban heat island effect include areas of deficiency of access to nature, areas of high density development with clusters of tall buildings, (including developments within identified Tall Building Zones (see Policy PS2)), and areas experiencing high levels of pollution. This includes developments within identified areas of sub-standard air quality (as shown on the Policies Map and Figure 8).

18.76 Part 1(c) requires development to demonstrate that they will not have a negative impact on open or water spaces. This is particularly applicable to tall buildings, as the overshadowing and light spill effects of tall buildings can have negative impacts on ecosystems in both blue and green spaces, and in many cases it is preferable to set taller buildings back from the edge of these spaces and step heights down as developments approach the water. Tall buildings can also create problems with bird strike, which is a particular risk on bird migration or commuting routes such as along the river Thames and river Lea, and between the Thames and other water bodies, and the design

process should consider options for reducing this risk. However, tall buildings also have the potential to have a unique positive impact on some elements of biodiversity – for example, as the site of nest boxes for peregrine falcons, who prefer to nest on taller buildings. Further examples of biodiversity features that can be included in tall buildings can be found in the High Density Living SPD.

18.77 Part 2 implements the Biodiversity Net Gain (BNG) approach to development, where the biodiversity on the site and its surroundings are improved relative to the pre-development baseline. Where biodiversity is reduced as a result of development, the enhancements to biodiversity provided through the development should provide greater overall biodiversity value than that lost. Given the nature of development sites in the borough, many are likely to have very low baseline levels of biodiversity. To ensure that this does not result in an excessively low biodiversity increase, developments must deliver a minimum of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) in habitat value for wildlife, as measured against the pre-development biodiversity baseline. BNG must be calculated using an appropriate Biodiversity Metric. This applies to all major development proposals, and minor developments which are not exempt under national guidelines. Minor developments that are exempt from mandatory BNG are still expected to deliver biodiversity enhancement in line with the Local Biodiversity Action Plan, appropriate to the scale of the development, but need not use the Defra Biodiversity Metric. Further guidance can be found in the Mayor of London's Biodiversity Net Gain SPG. It should be noted that simply delivering the required BNG is not sufficient justification for developers to argue for an 'acceptable' loss of good quality habitat.

18.78 As part of major development proposals, BNG commitments will be secured and monitored by planning obligation or condition.

18.79 The policy applies to all major development proposals and most minor proposals, with only the following development being exempt from mandatory BNG, consistent with national guidance:

- a. for minor development proposals only, development impacting habitat of an area below a 'de minimis' threshold of 25 metres squared, or 5m for linear habitats such as hedgerows and watercourses;
- b. householder applications;
- c. BNG sites (where habitats are being enhanced for wildlife); and
- d. small scale self-build and custom housebuilding.

18.80 While change of use applications are not specifically exempt, the majority of types of change of use applications will be exempt through the de minimis habitat exemption.

18.81 The latest Tower Hamlets Local Biodiversity Action Plan gives details of priority habitats and/or features for priority species (see parts 1 and 2). Features of biodiversity or ecological value include:

- a. linear corridors, such as watercourses, hedgerows and buffer zones;
- b. veteran trees;
- c. old hedges; and
- d. habitats or species identified as local, London or national priorities, and features which might support such species.



18.82 Where geographically relevant, the Thames River Basin Management Plan objectives should also be incorporated.

18.83 Where a development proposal is located within the Canal & River Trust's statutory consultee notified area, (especially within 10m of the waterway), the developer is encouraged to undertake pre-application discussions with the Canal & River Trust to ensure that appropriate BNG requirements and opportunities are discussed.

18.84 Any development in proximity to a watercourse (10m, or 5m for ditch) is required to achieve 10% uplift in watercourse units.

Developments whose Red Line Boundary is within 10m of a watercourse must carry out the Watercourse Unit Module element of the Biodiversity Net Gain Assessment, with a minimum of 10% net gain in watercourse units gained.

18.85 Part 3 requires major developments to submit an ecology assessment. The ecology assessment should include: (a) information assessing the characteristics and situation of the site, and (b) details on how the proposals will protect or replace, and enhance existing biodiversity on the proposed site, including measures for wildlife habitats and features aimed at particular species.

18.86 Applications should also detail how recommendations are being included in the development proposals. Should the ecology assessment indicate an adverse impact on the biodiversity interest of the site, this will be managed using the hierarchical approach set out in part 5. Should compensation be sought, it would be at the level required to adequately offset the impact on the SINC or protected/priority species, through the provision of an alternative site or habitat.

18.87 Part 4 seeks to protect the integrity of any European or nationally designated site of nature conservation importance. There are no such sites within Tower Hamlets, but development may have the potential to adversely impact sites beyond its boundary – such as the Epping Forest Special Area of Conservation and the Lea Valley Special Protection Area – through air pollution, water abstraction and/or increased visitor pressure. Where the application is of such a scale, location, or nature as to potentially have such an effect on a European site, applicants should seek advice from Natural England as to whether a Habitat Regulations Assessment would be required. The assessment will need to demonstrate that the development will not adversely impact on the integrity of the European site. Proposals will be resisted where they will

have significant adverse impact on European sites.

18.88 Part 5 seeks to protect locally designated SINCs and important species. The presence of protected species is a material planning consideration where a development is likely to result in harm to a habitat or species. Priority species are those identified in the Tower Hamlets Local Biodiversity Action Plan, Species of Conservation Concern in London and Species of Principal Importance in England, as identified under section 41 of the Natural Environment and Rural Communities Act. Developers should ensure that they comply with regulations requiring time-restricted ground works due to the time periods of specific protected species activity.

18.89 Under part 6, 'potentially invasive non-native species' includes plants listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and plants identified as species of concern by the London Invasive Species Initiative and those listed as 'species of special UK concern' within (IAS) (Enforcement and Permitting) Order 2019. Some plants that are regularly used in horticulture produce nectar that is toxic to bees. These include several non-native species of lime trees. These species should not be included in the landscaping of development. In addition, planting schemes should be selected according to their suitability for local growing conditions (soil, temperature ranges, rainfall, periods of inundation, sunlight and shade), their ability to attract wildlife (e.g. nectar rich planting) and to conserve water. Planting along river corridors should only include native species. This will need to be evidenced in the ecology statement.

London Plan policies:

- G6 Biodiversity and access to nature
- G7 Trees and woodlands

Local Plan policies:

- CG1 Mitigating and adapting to a changing climate
- CG7 Managing flood risk
- CG8 Sustainable drainage
- CG10 Air quality

Evidence base:

- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- Tower Hamlets Local Biodiversity Action Plan, 2019
- London Green Grid Supplementary Planning Guidance, 2012
- London Plan Guidance – Urban Greening Factor, 2023
- Review of Sites of Importance for Nature Conservation in Tower Hamlets, 2023
- Tower Hamlets Biodiversity Net Gain Feasibility Study, 2023

Policy BO5 Urban greening

1. The council will expect development proposals to maximise opportunities for urban greening. This includes the integration of high-quality and species diverse landscaping, street trees, wildlife habitat, green roofs and walls, and sustainable drainage systems. They must be designed with consideration given to the site context and the wider landscape setting as well as the layout, design, construction and long-term management of buildings and spaces.
2. Development proposals are required to meet the Urban Greening Factor (UGF) target set out in the London Plan of 0.4 for residential development or 0.3 for non-residential development, based on the factors set out in this policy.
3. The urban greening factors are as follows:

Table 12: Urban Greening Factors

Surface cover type	Factor
Semi-natural vegetation (e.g., trees, woodland, species-rich grassland) maintained or established on site.	1
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1
Native wetland vegetation established in an area of adjacent river or canal if appropriate and agreed with the Canal & River Trust which previously lacked vegetation.	1
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area for the mature tree.	0.8
Mixed native hedges (line of mature shrubs, two shrubs wide and comprised of at least five native shrub species).	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) that meets the requirements of GRO code 2014.	0.7
Flower-rich perennial planting.	0.7

Surface cover type	Factor
Rain gardens and other vegetated sustainable drainage elements.	0.7
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6
Green wall – modular system or climbers rooted in soil.	0.6
Allotment gardens or similar community or residential growing spaces.	0.6
Shrub planting (including hedges that don't meet the definition of native mixed hedges)	0.5
Groundcover planting.	0.5
Amenity grassland (species-poor, regularly mown lawn).	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO code 2014.	0.3
Water features (chlorinated) or unplanted detention basins.	0.2
Permeable paving.	0.1
Sealed surfaces (e.g., concrete, asphalt, waterproofing, stone).	0

4. Development proposals must be consistent with the provisions of the Tree Management Plan 2020-2025 including protecting and increasing the provision of trees through:

- a. protecting all trees, including street trees;
- b. incorporating native trees, wherever possible; and
- c. providing replacement trees, including street trees, where the loss of or impact on trees in a development is considered acceptable.

5. Development proposals involving the regeneration of existing council property – including housing stock, estates, public realm, and place improvements – must seek to maximise urban greening, whether through tree planting, green roofs, or any other measures that will enhance the biodiversity and greening of existing developments.

Supporting text

18.90 Urban greening is a term used to describe a wide range of measures that can be incorporated into buildings and spaces to increase green cover in the borough. These measures include but are not limited to: tree planting, naturalised biodiverse landscaping, green roofs and walls, hedges, climbers, plants for pollinators, de-paving, rain gardens and sustainable drainage systems using natural or semi-natural features. Urban greening can provide multifunctional benefits such as for climate change resilience, amenity including air quality, nature conservation and local character (see part 1).

18.91 Part 2 is based on Policy G5 of the London Plan, which sets the Urban Greening Factor (UGF) requirement for major developments.

18.92 The UGF is a model used to provide a baseline for the amount of green cover that development will be expected to achieve, taking into account various site development factors. In addition to setting minimum UGF requirements, the London Plan allows boroughs to develop a tailored approach to the factors set out in that policy to encourage amenity space, enhance biodiversity, address the urban heat island effect, and provide sustainable storm water drainage.

18.93 The London Plan explains that the urban greening factor for a proposed development is calculated using the formula: $(\text{Factor A} \times \text{Area}) + (\text{Factor B} \times \text{Area}) + (\text{Factor C, D, etc} \times \text{Area}) / \text{Total Site Area}$

18.94 A site of 1,000sqm total area which provides 600sqm of extensive green roof, 250sqm of hard sealed car parking, 100sqm of open water, and 50sqm of amenity grassland would score as follows: $(0.7 \times 600) + (0 \times 250) + (1 \times 100) + (0.4 \times 50) / 1000 = 0.54$. This would exceed the target score of 0.4 and therefore meet the requirements of the policy, and provide a number of benefits to the health and well-being of residents



18.95 Part 3 sets out our approach to the urban greening factor in the borough. Unlike the London Plan policy, this is intended to be applied to developments of all sizes, and the non-residential approach does not exclude B2 and B8 uses. This approach is justified on the basis of the urgency of the climate crisis, its effects on biodiversity and flood risk, the presence of a large area of deficiency of access to nature in parts of the borough, and the importance of providing additional green spaces throughout the borough.

18.96 Table 12 sets out the factors to be used in calculating the urban greening factor score for developments. This table is based on table 8.2 of the London Plan, but with the following changes:

- Addition of native wetland vegetation along rivers and canals, to support the rehabilitation and rewilding of the Borough's water spaces.
- Addition of allotments and growing spaces, to encourage delivery of these kinds of spaces on new developments. These spaces do not provide as high a biodiversity benefit as wetland habitat creation but provide similar benefits to groundcover planting with additional social and community benefits, and have therefore been given a slightly higher factor than groundcover planting. These spaces should ideally be located on ground level, but rooftop growing spaces may also be appropriate where they are made widely accessible to residents and the surrounding community.
- Hedges have been separated into mixed native hedges, and other kinds of shrubbery planting. The former are felt to provide a much higher biodiversity benefit than the latter, and this has been reflected in the scoring.

18.97 Due to the environmental importance of trees, at least a 'one for-one' replacement rate is required for any trees affected by a development (see part 3). Where development proposals can demonstrate that these cannot be incorporated on site, we will consider the provision of a replacement tree on a suitable site, as close to the development as possible, subject to investigation and submission of details of any below ground utilities, to establish tree planting is appropriate and practical in that location. We will also expect development proposals to incorporate additional trees, wherever possible. Their location must be carefully considered to ensure there is no adverse impact on overshadowing, wind effects, air quality, ecology, or flood risk. Where trees are proposed along the river corridor, their positioning must be carefully considered to ensure there are no adverse impacts on ecology or flood risk. A buffer of at least five metres is

suggested between the bank and tree. We will take a 'right tree for the right site' approach which takes account of historic context, availability of space, soil conditions, wildlife value, potential improvements to air and soil quality, provision of shade and reducing the effects of and adapting to climate change. This will need to be evidenced in the ecology assessment.

18.98 Part 5 emphasises the need for urban greening measures to improve the overall quality of the public realm within the borough, particularly in regeneration projects where the ability to introduce additional green open space may be limited.

London Plan policies:

- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands

Local Plan policies:

- CG1 Mitigating and adapting to a changing climate
- CG7 Managing flood risk
- CG8 Sustainable drainage
- CG10 Air quality

Evidence base:

- Tower Hamlets Open Space Strategy, 2017
- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- All London Green Grid Supplementary Planning Guidance, 2012

Policy BO6 Play and recreation spaces

1. Development proposals must provide or help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation, and play. This will be achieved through:

- a. protecting existing play, informal recreation, and sporting facilities. The loss of play and informal recreation facilities will be resisted unless replacement space of equivalent size, quality of amenity, and functionality is provided either onsite or in the local neighbourhood, with unrestricted public access, and
- b. maximising opportunities to deliver new and improved play and informal recreation facilities, along with public realm enhancements, so that sports and recreation facilities and play spaces can be reached safely and easily throughout the borough.
- c. adapting play space to be accessible for those with disabilities through providing areas which contain accessible facilities such as the provision of equipment adapted for children with additional needs, quiet seating areas and visual aids.

2. New play and informal recreation facilities should be designed to meet the needs of Tower Hamlets' population, be inclusive, accessible, and safe, through:

- a. co-design with local adults, children and young people, parents, and carers on the design of new provision early on in the development of an application; and

- b. designing play and informal recreation facilities which are exciting and engaging for all abilities and ages. Facilities should be well-designed, secure, and free to use. They should provide for a range of interests and address barriers to play by tackling issues of inclusion and equity; and reduce the harm caused by poor air quality through the favourable location of play and informal recreation facilities to minimise exposure to pollutants and careful layout and choice of soft landscaping.
- c. ensuring play space is accessible from surrounding all public spaces; enabling a range of users.
- d. providing play public space nearby existing community amenities, not solely existing park spaces such as GP surgeries, community centres and areas which have a high deficiency of play space.

3. The net-loss of play space will not be acceptable as development proposals will instead need to redevelop these spaces into higher value play spaces. This would include, but would not be limited to; enhancing the accessibility and facilities available to the public. Where construction requires the redevelopment of an existing play space, a temporary play space of the same dimensions and quality will need to be provided within the vicinity of the development site until the improved play space is completed.

Supporting text

18.99 Part 1 recognises that play space is essential for the cognitive and physical development of children and young people and their ongoing health and well-being. Space for recreation is also essential for people of all ages and supports improved physical and mental health and well-being and provides spaces for residents to meet and interact socially, particularly with those outside of their existing social spheres.

18.100 It is important that play space is not restricted to parks but is integrated into a range of public spaces. This can help enable liminal spaces to become areas where people can play and rest, enabling good design. This will allow for the environment to become more engaging and connected to existing public space facilities.

18.101 Part 1(a) resists the loss of existing play, recreation, and sporting facilities on the basis that the borough's open space and indoor recreation and sports facilities face pressure from the borough's increasing population. For the purposes of this policy, the local neighbourhood is defined as an area within 15-minute walking distance (1km) using existing pedestrian routes.

18.102 The Play Space Strategy, based on findings from the Tower Hamlets Child Play Space Audit (2024), sets out an indicator of where existing play spaces need to be protected and enhanced throughout the borough due to the overall deficiency of play space.

18.103 It is encouraged that high value play spaces are identified and developed in areas which are deficient in play space as indicated in the Play Space Audit. Developers will be required to ensure play space is under review and will be monitored by the consent and delivery of new high-value play spaces through planning applications.

18.104 Development proposals must consider the existing play space identified within the most recent play space audit to consult and understand what is required on the site. The temporary provision and re-provision of high value play space would then be delivered through a Construction Management Plan.

18.105 Poor access, or perceptions of poor access can be a major factor limiting use of play and informal recreation spaces and formal sports facilities. Where development proposals include the provision of new play and informal recreation spaces and sports facilities, these should be designed to be welcoming to all communities in the borough, with clear routes to the spaces and facilities and wayfinding or signage from the nearest major route where necessary. Where a development proposal is in close proximity to an existing play or informal recreation space or sports facility, it should provide public realm enhancements that improve the routes to the space or facility, particularly where it is a larger space or facility that is likely to draw users from the wider neighbourhood.

18.106 Play and recreation spaces and facilities should serve all members of the Tower Hamlets community and should be genuinely inclusive.

18.107 To achieve this, development proposals are encouraged to engage in co-design with local residents, with a particular emphasis on engaging children and young people in the design process. This should occur as early in the design process as possible to ensure that the co-design is meaningful and can influence the layout of other elements of the development proposal (see part 2(a)).

18.108 Part 2(b) provides key design criteria for play and informal recreation facilities. Play spaces should be positioned at least 50m

away from highly used roads to ensure vulnerable residents that are at a heightened risk of negative health outcomes, due to exposure to air pollution and high ambient noise level sources, are not impacted when playing. More information and guidance can be found in the Mayor of London's Play and Informal Recreation SPG. New development should also be consistent with Play England Design Principles.

London Plan policies:

- S4 Play and informal recreation
- S5 Sports and recreation facilities

Local Plan policies:

- CG10 Air quality
- HC10 Housing standards and quality
- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- MC2 Active travel and healthy streets

Evidence base:

- Tower Hamlets Open Space Strategy, 2017
- Active Design Guidance, 2023
- Tower Hamlets Playing Pitch Assessment, 2017
- Tower Hamlets Joint Strategic Needs Assessment, 2023

Policy BO7 Food growing

1. The council will seek to protect existing allotments and community gardens and maximise the provision of new food growing spaces to support sustainable food growing locally, and to enhance opportunities for leisure, social interaction, improved physical and mental health, and education.
2. Major development proposals that include housing, and development proposals for community facilities, will be encouraged to include and equip space for community gardening and food growing. Where such provision exists and a site is to be redeveloped, development proposals will not be supported unless the existing provision is retained or re-provided, and if necessary, enhanced (i.e., increased in size and/or improved in quality).
3. Where it does not conflict with other policy objectives, land use priorities or exceed the Soil Guideline Values set by the Environment Agency, the council will support the use of land and buildings as new allotments for local food growing spaces and production including:
 - a. the temporary use of vacant or derelict land; and
 - b. the use of incidental open space on housing estates and other open space areas.

Supporting text

18.109 Food growing can have a positive impact on physical and mental health and well-being, creating opportunities for social interaction and cross-cultural engagement, as well as providing a source of fresh and low-cost food for local communities. In recognition of these positive impacts, part 1 seeks to ensure that all lawful existing allotments and community gardens are retained and enhanced where possible.

18.110 Given the high level of demand for existing allotments and community gardens and the increased pressure that new development is placing on all such facilities, part 2 encourages development proposals for community facilities and major residential developments to provide and properly equip space within their sites for community gardening and food growing. Any new allotment space should be accessible and inclusive and should be considered in the context of the wider public realm. Maximising the reuse of rainwater for watering and the provision of watering points should be considered when providing new facilities.

18.111 Allotments and community gardens are good for community activities and should be developed with accessibility in mind, considering adequate space provision for wheelchair access and wayfinding.

18.112 Vacant sites and incidental open spaces or lawn spaces within housing estates and elsewhere in the borough have the potential to be used for community gardening and food growing with relatively minimal investment. Part 3 provides support for such uses.

18.113 There is potential for land to contain contaminated soil with harmful substances such as heavy metals and asbestos. Prior to the use of a site for food growing, a land contamination assessment will need to be undertaken to ensure that the soil does not exceed the Soil Guideline Values and would not pose an immediate risk to public health. This would be undertaken prior to a development proposals approval or as a condition.

London Plan policies:

- G8 Food growing

Evidence base:

- Tower Hamlets Open Space Strategy, 2017

19. Movement and connectivity

MC1 – Sustainable travel

MC2 – Active travel and healthy streets

MC3 – Impacts on the transport network

MC4 – Parking and permit-free

MC5 – Sustainable delivery, servicing and construction



Introduction

19.1 This chapter focusses on how residents and visitors travel across the borough, considering how easy, accessible, and safe it is to walk, wheel, cycle, and take public transport in Tower Hamlets. This chapter also sets out to address how the borough can support those in the community who depend on private vehicles for work or mobility in accordance with the Mayor's commitments outlined in the 'Cleaner and greener future for Tower Hamlets' document (2023).

19.2 Tower Hamlets is a well-connected borough, with access to the London Underground, Docklands Light Railway, National Rail connections and an extensive bus network. There has been significant increase in public transport infrastructure to accommodate growth, most recently including the opening of the Elizabeth Line at Whitechapel and Canary Wharf stations. The borough has good levels of sustainable travel; in 2023, Tower Hamlets was ranked 7th out of all London Boroughs on the Healthy Streets Scorecard, and improvements to walking and cycling connections means that over 80% of trips last year were by sustainable modes (public transport, walking, and cycling). However, there are some areas of the borough which are less well served by public transport, particularly towards the east of the borough.

19.3 Planned growth in new homes and jobs, coupled with London's overall growth, will significantly increase resident, commuter, and freight movement within and through the borough. This will create further pressure on the road and wider public transport network which is already at or close to saturation in some parts of the borough at peak times, as well as adversely affect air quality and the natural environment.

19.4 Many areas of the borough face significant issues with traffic and congestion. The major highway connections, particularly the A11, A12 and A13 trunk roads carry large numbers of motor vehicles through the borough, which results in areas of high air pollution. This is linked to lower-than-average life expectancies for residents, high levels of asthma and reduced lung capacity in children.

19.5 Furthermore, it is estimated that nearly a quarter of borough residents do not get the recommended minimum amounts of physical activity levels to support health and well-being. The health implications of physical inactivity are also an important local issue, which the promotion of active travel can help to address.

19.6 This Plan seeks to facilitate change to increase healthy and sustainable travel by supporting the development of a healthy, safe, and inclusive transport network across Tower Hamlets that incentivises a modal shift to walking, wheeling, cycling, and public transport. This will reduce traffic congestion and pressure on the public transport network, while contributing to a cleaner and healthier environment for borough residents and visitors.

19.7 This section contains the following policies:

- MC 1: Sustainable travel
- MC 2: Active travel and healthy streets
- MC 3: Impacts on the transport network
- MC4: Parking and permit-free
- MC5: Sustainable delivery, servicing, and construction

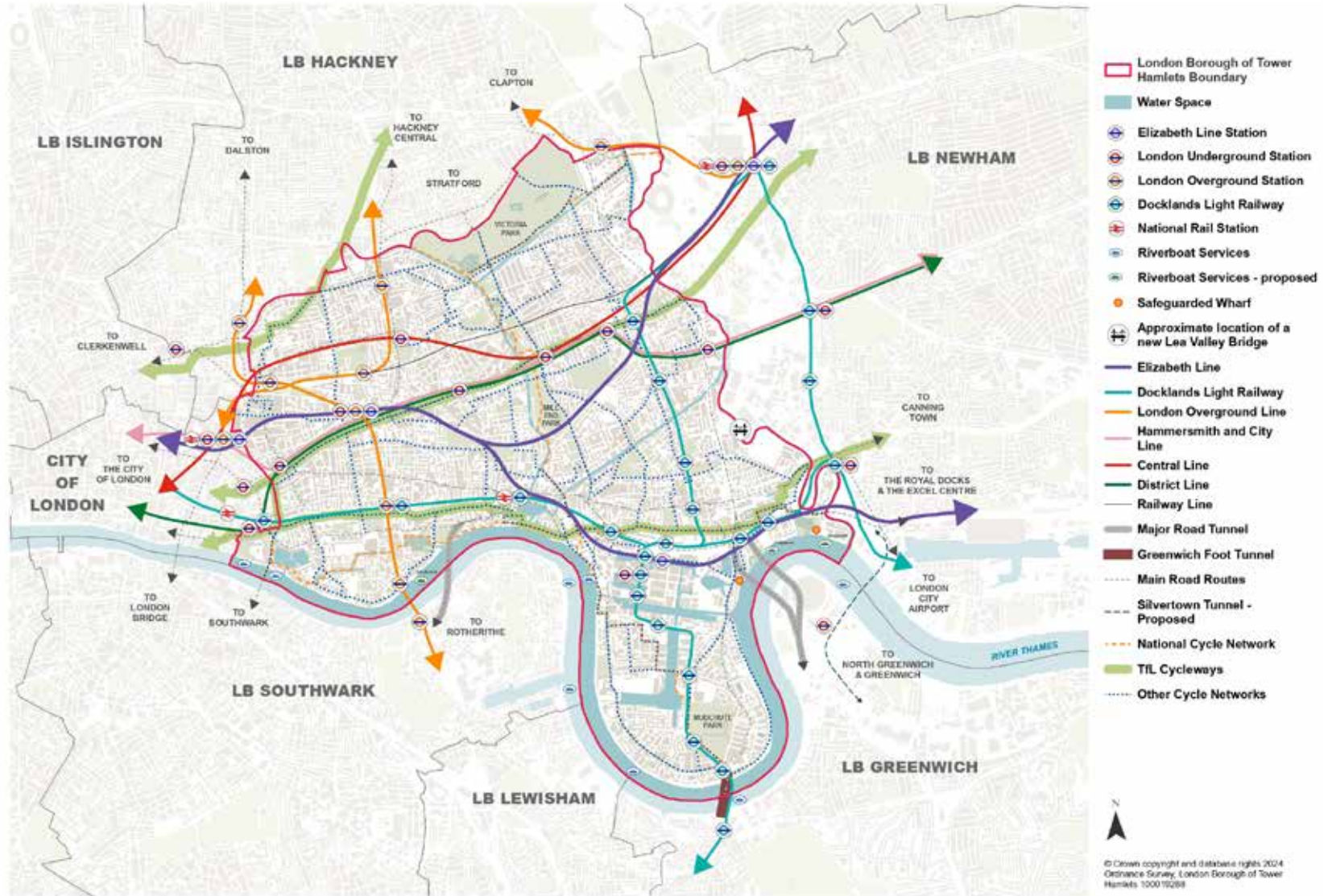


Policy MC1 Sustainable travel

1. The council will promote the development of a healthy, safe, and environmentally friendly transport system that is inclusive, accessible, and affordable for all who live, work, study in, and visit the borough, in accordance with the latest guidance. Development proposals will therefore be expected to:
 - a. ensure the primary mode of travel for short trips in the borough is focused on active travel modes, enabling more people to walk and cycle, in line with 15-minute city principles, by utilising a Healthy Streets Approach in the design and management of the development;
 - b. improve access to public transport, including water transport, to reduce reliance on private vehicles;
 - c. be integrated effectively alongside public transport, walking, wheeling, and cycling routes to maximise ease of access to sustainable travel modes in line with the sustainable mode hierarchy, reduce severance and increase permeability across the borough;
 - d. be focused within areas with high levels of public transport accessibility and the town centre hierarchy, in respect of developments generating significant levels of trips; and,
 - e. not adversely impact the capacity, quality, accessibility, and safety of the transport network in the borough.

2. Where appropriate, development must support and safeguard land for transport and freight infrastructure enhancements to meet the demands arising from future growth, including improvement to capacity, connectivity, quality, and interchanges across the network.
3. The council will also support applications for new standalone micro-consolidation centres within the borough in appropriate locations.

Figure 20: Connectivity map



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Supporting text

19.8 To address the significant issues surrounding highway congestion, poor air quality and capacity constraints across the public transport network, a number of strategic and local transport improvements are underway, planned, or have been recently delivered across Tower Hamlets. However, further infrastructure investment will be required to accommodate the predicted population and employment growth, and in some locations development could be significantly hindered without appropriate enhancements to the transport network. There is a particular need to invest in active, efficient, and sustainable transport infrastructure, to make the most efficient use of space in a rapidly growing borough, and ensure that those who are still required to drive for employment, caring, or family reasons are able to do so.

19.9 Tower Hamlets has a low car ownership ratio with only 33.6 % of households owning one or more cars, compared to 57.9% across Greater London. Before the pandemic, data indicated that residents preferred sustainable transport modes to travel to work, such as public transport (60%), walking or cycling (26%), with commuting by car at 12%, which was lower than the London average, at 30%. While travel-to-work patterns have shifted dramatically following the COVID-19 Pandemic, recent demand patterns indicate that weekday bus demand has recovered to 82% and underground to 80% of pre-pandemic levels. This reinforces the need for developers to prioritise sustainable travel in the design and delivery of their schemes, particularly walking, cycling and public transport, helping to relieve congestion, reduce air pollution and improve journey times.

19.10 This policy seeks to manage growth to ensure it does not increase traffic congestion and crowding on public transport due to



trip generation from developments and through-trips. The location of development proposals close to services and amenities, integration with the transport network, prioritising the most sustainable forms of travel, and facilitating and enabling behaviour towards the use of public transport and active forms of travel are crucial factors in accommodating the predicted population and economic changes over the plan period. Development proposals must accord with the latest guidance and policy approach set out in the London Plan, The Mayor of London's Transport Strategy, the Tower Hamlets Transport Strategy (2019) and seek to achieve the targets of the most recent Local Implementation Plan (LIP).

19.11 Part 1(a) seeks to ensure that development proposals support walking and cycling as a primary means of travel in line with the London Plan (2021) Healthy Street Approach. Development should incorporate and improve pedestrian and cycling environment that is safe, accessible, and permeable both within the borough and into neighbouring boroughs. It also identifies the necessity to link development to the borough's pedestrian networks, such as the Green Grid network and Thames Path, and strategic cycling networks, and improve access to river transport where possible, in accordance with the borough's Transport Strategy (2019).

19.12 Part 1(c) ensures that development proposals support the use of, and connect to, public transport, cycling and walking facilities that surround the site. The design, management, and operation of a development should encourage its users to travel in a sustainable manner. It should also be permeable and provide links to existing or planned infrastructure as well as relevant on-site infrastructure, such as bicycle storage, workplace showers and changing facilities.

19.13 Part 1(d) identifies the need for development proposals to be located in an area appropriate to the number trips it generates. The scale of development must reflect the level of public transport available. Transport for London (TfL) has mapped the Public Transport Accessibility Levels (PTAL) across the whole of London; the PTAL toolkit is a measure of accessibility to the public transport network, taking into account walk access times and service availability. Areas are graded on a scale between 0 and 6b, with a score of 0 is very poor access to public transport, and 6b is excellent access to public transport. In Tower Hamlets, ratings range from highly accessible areas – such as Canary Wharf, Whitechapel, Bethnal Green, Bow and Mile End - to areas with lower levels of public transport accessibility, including parts of the Lower

Lea Valley. It should be noted that PTAL values are regularly updated, and the latest values should be used to assess accessibility levels.

19.14 The scale of development should also have regard to the town centre hierarchy, whereby development densities should consider the availability of nearby shops, services, and amenities, thereby reducing the need to travel.

19.15 Part 1(e) seeks to ensure that development proposals do not have a detrimental impact to the safety and efficient operations of existing transport networks. In particular, development proposals must ensure consideration of:

- the safety of the highway user and/or the ability of public transport providers to safely operate services which includes consideration of adequate driver welfare facilities and bus stands;
- the demand on the borough's transport networks beyond operational limits and/or capacity;
- the potential reduction in the quality of stations, stops, or services; or
- restrictions on access to the same services.

19.16 Development proposals are expected to be well-integrated with the public transport network and contribute to its efficient running and service improvements. Developers should ensure they engage early with relevant bodies (e.g. Transport for London) to establish the likely impacts and/or appropriate mitigation measures towards public transport to be funded through developer contributions in accordance with Policy DV1.

19.17 Part 2 identifies the role of development proposals in supporting improvements and enhancements to the borough's transport and freight infrastructure (including safeguarded wharves and consolidation

centres). Applicants should work with the council to support planned and future transport initiatives that underpin new growth; any development that adversely affects or planned infrastructure improvements will not be supported.

19.18 Where infrastructure enhancements will be required to meet the demands arising from future growth, the council will work in partnership with neighbouring boroughs, Transport for London and other agencies (e.g. Highways England) to understand and address the future transport needs of the borough and cross-boundary transport needs.

19.19 The list below sets out a number of planned interventions that are required to support the borough's transport network.

- New pedestrian and cycle networks, by reducing severance of major arterial roads, improving cross-river and other waterways connections, and improving connectivity for pedestrians and cyclists;
- New cycle infrastructure, including Cycleway routes and the Mayor of London's cycle hire network;
- Enhancements to the bus network to South-East London facilitated by the Silvertown Tunnel (2025), including new route SL4 Grove Park – Canary Wharf, which will form part of the emerging Superloop London orbital bus network;
- Improvements to DLR network capacity, station improvements (including improving step-free access and improved modal interchange) and other rail network improvements; and
- Improved river services and potential new piers at Wapping, Canary Wharf East and Trinity Buoy Wharf and Blackwall Reach.
- North South Route from Hackney Wick Station, across the Hertford Union Canal via the new Roach Point Bridge, to Fish Island.³³

³³ As identified in the LLDC Local Plan and the Hackney Wick Fish Island SPD

19.20 In addition, as set out in the Lower Lea Valley Connection and Movement Study, development proposals in the Leaside Valley area to the east of the borough are expected to contribute to the delivery of the following priority interventions to improve walking and cycling connections:

- High-quality cycle provision along the B140 (Devas Street and Devons Road), including potentially through removal or relocation of on-street parking.
- Junction re-design at Campbell Road, Violet Road and Devons Road to replace roundabouts with T-junctions, remove guard rails, and relocate pedestrian crossings closer to desire lines.
- Signalise junction of Devas Street, A12, and Twelvetrees Crescent, and open up east-west walking and cycling movement across the A12 at this location.
- High-quality cycle provision along Violet Road, Morris Road and Chrisp Street, including potentially through removal or relocation of on-street parking.
- Creation of an east-west walking and cycling 'spine' from the River Lea to Langdon Park DLR Station by delivering high-quality cycle provision and improved footways along Lochnagar Street, Zetland Street, St Leonard's Road, and Langdon Park. Closure of the slip road from the A12 onto Teviot Street, to allow a wide footway and easier north-south movement.
- Creation of an east-west walking and cycling 'spine' between Abbott Road and Chrisp Street Market by delivering dedicated cycling provision and continuous footway crossings along Blair Street and Brownfield Street. This should include environmental improvements to the subway crossing at Balfron Tower, a new crossing between

the top of Abbots Road and Jolly's Green, and aligning the Chrisp Street crossing with Brownfield Street and converting it to a 'toucan' crossing.

- Traffic calming on Abbott Road, including high-quality cycling provision and continuous footway crossings. Upgraded, 'toucan'-style crossings should be provided at the junctions with Aberfeldy Street, Dee Street, and Blair Street.
- Remodeling of Leamouth Junction for safe cycle and pedestrian movement, including introduction of high-quality cycling provision on the roundabout and on Leamouth Road.

19.21 These interventions should be delivered through funding mechanisms including S106 agreements, CIL payments, and other sources of funding.

19.22 Further interventions that the council will support include ensuring partnership with the London Borough of Newham and developers on relevant sites, to deliver up to five new crossings of the River Lea, and one additional bridge entirely within Tower Hamlets. Where relevant, development proposals on the Tower Hamlets side of the river will be expected to safeguard land to contribute towards the delivery of:

- Lochnagar Bridge, from Lochnagar Street to Canning Town Riverside
- Poplar Reach Bridge, from the north of the Leven Road site to Cody Dock
- Mayer Parry Bridge, from the south of the Leven Road site to Canning Town Riverside
- Leamouth Crossing, from Orchard Place to the Limmo Peninsula
- Trinity Buoy Wharf to Thames Wharf Bridge
- A13 walkway, from the Blackwall Trading Estate, under the A13, to the Leamouth Depot site

19.23 In addition to safeguarding land, that the layout and design of development proposal on or adjacent to these crossings responds to these new connections with active and viable routes that are safe and welcoming for all users.

19.24 These lists are not exhaustive, and new interventions may arise from other transport strategies and assessments alongside regional policies, such as the emerging Tower Hamlets Infrastructure Development Plan. Development may also be required to contribute financially towards new transport infrastructure and improvements in accordance with Policy DV5.

London Plan policies:

- S115 Water transport
- T1 Strategic approach to transport
- T2 Healthy Streets
- T9 Funding transport infrastructure through planning

Local Plan policies:

- CG9 Air quality
- DV1 Areas of growth and opportunity within Tower Hamlets
- DV5 Developer contributions

Evidence base:

- Mayor's Transport Strategy
- Strategic Transport Assessment, 2016
- Tower Hamlets Transport Strategy, 2019-2041
- Lower Lea Valley Connection and Movement Study, 2020
- East of the Borough AAP Transport Report, 2020

Policy MC2 Active travel and healthy streets

1. All development proposals that involve changes to streets should implement the Healthy Streets Approach.
2. Development proposals must demonstrate how they have applied the London Plan Healthy Streets Approach in the design process. This will be achieved by requiring:
 - a. all major development proposals to submit a Healthy Streets Assessment as part of the transport assessment; and
 - b. positive engagement with the Healthy Streets Approach to deliver public realm and other improvements that support walking, wheeling, cycling, and the use of public transport.
3. Development proposals must be designed to maximise the contribution of the public realm to encourage and enable active travel modes by:
 - a. safeguarding, maintaining, and enhancing the Borough's network of walking routes and cycleways, including the Thames Path and the Green Grid Network;
 - b. providing unobstructed footway widths of at least 2 metres, or as calculated using the TfL Pedestrian Comfort Level tool, whichever is greater;
 - c. ensuring contiguously permeable public realm by foot, wheeling and cycle, and connect to local walking and cycling networks as well as public transport;
 - d. providing legible routes for walking, wheeling, and cycling to

and within sites, ensure signage, street signs and place names are easy to read; where appropriate contributing to the 'Legible London' programme;

- e. ensuring an inclusive-by-design approach, with consideration for the accessibility and safety of all users, giving particular attention improving accessibility of streets for older users and users with disabilities, and consider the safety and comfort in the public realm of women, girls, and gender diverse people, by:
 - i. having well-maintained streets which are free from clutter and meet minimum width requirements (above);
 - ii. ensuring good sight lines and visibility with plenty of well-lit entrances and exits;
 - iii. maximising opportunities for passive surveillance by using ground floor units to create active frontages, where feasible;
 - iv. considering the needs of both daytime and night-time uses; quieter daytime routes that favour access to green spaces and avoid busy roads, and night-time routes that pass by transport hubs and busier pedestrian ways; and
 - v. providing segregated routes for pedestrians and cyclists where possible, and shared use routes in streets with high pedestrian or cyclist flows should be avoided.
- f. supporting the delivery of the Tower Hamlets Transport Strategy (2019) and the Mayor of London's Cycling Action Plan 2 (2023), by:
 - i. contributing to the expansion of the strategic cycle network, providing protected cycle lanes where required; and

- ii. providing high-quality long- and short-term cycle parking within new developments that is fit-for-purpose, secure, well-located, and is suitable for a wide range of cycle types, including adapted cycles and cargo bikes (see Policy MC4).
4. Development proposals that adversely impact the safety, accessibility, legibility, connectivity, and convenience of the Borough's walking and cycling network will not be supported.

Supporting text

19.25 Active travel aims to promote and encourage walking, cycling, and other active modes of transportation to improve public health by increasing physical activity levels, reduce air pollution and greenhouse gas emissions, reduce traffic congestion, and improve road safety, and create more liveable cities and communities. Overall, active travel aims to create sustainable and healthier transportation options for individuals and communities. In committing to becoming one of the best places to walk and cycle in London, Tower Hamlets can fulfil these aims.

19.26 Physical inactivity is a major cause of disease, and nearly a quarter of Tower Hamlets' residents do not get the recommended minimum levels of daily physical activity. In addition, encouraging more people to choose active travel will reduce reliance on private vehicles, especially for short journeys, and help to relieve pressure on the public transport network.

19.27 The 'Healthy Streets Approach' prioritises the health and well-being for all those who live, work, study in, and visit the borough, by putting human needs and experiences at the centre of public realm and transport design. Streets should be welcoming places where everyone feels able to spend time, engage in physical activity, or socialise with other people. Healthy streets support many types of active travel, from commuting to work, walking for pleasure, or cycling with children to school, all of which require different kinds of route. Healthy streets support vibrant and lively communities, where different groups can come together to socialise and enjoy public spaces. The design of healthy streets should have regard for other relevant best practice guidance, such as Sport England's Active Design Guidance (2023).

19.28 This policy embeds the council's road user hierarchy, which prioritises walking and cycling, then public transport use, as sustainable modes of travel, followed by all other modes of motorised transport.

19.29 Part 1 of this policy requires development proposals to improve the quality and connectivity of walking, wheeling, and cycling routes in the area. Development proposals are required to demonstrate how they have applied the Healthy Streets Approach as set out in the London Plan as part of the transport assessment.

19.30 Part 2 requires major development proposals to submit a Healthy Streets Assessment as part of the transport assessment. By utilising the Healthy Streets Design Check tool which scores proposed street design interventions against the 10 Healthy Street Indicators, the results can be used to measure how design features may improve a potential street, as well as identify areas of poor street design opportunities to make further improvements.³⁴

19.31 Part 3 sets out how development proposals should engage positively with the design of high-quality public realm within and in the vicinity of the development, to encourage and enable active travel. Walking and cycling networks must be:

- safe;
- accessible;
- legible and easy to use;
- connected; and
- convenient.



19.32 Part 3(a) requires development proposals to safeguard and contribute to maintaining and enhancing the boroughs network of walking routes and cycle ways, particularly the Thames Path and Green Grid Network. The Green Grid Strategy identifies a series of strategic projects to improve cross-borough connections and improve active travel and urban greening. This policy should be read in conjunction with Policy BO2 Open spaces and the green grid network.

19.33 Part 3(b) requires developments to provide a minimum unobstructed footway width of at least 2 meters. To support active

³⁴ Healthy Streets Design Check England, DfT (2021)

travel, footpaths should be spacious enough to support a wide range of users and uses. Street clutter can be anything which takes up additional space on the pavement, such as signage, cycle parking, café seating, planters, and EV charging points. While many of these items individually can contribute to improved look or comfort of the street, such as urban greening, improved lighting, and places to rest and socialise, when crowded together they can obstruct the footway and hinder pedestrian movement. Obstacles can significantly hinder the ability to navigate the public realm, and particularly impact people with mobility or visual impairments. In some instances, such as within town centres and other high traffic areas, minimum unobstructed footway widths of 2 metres may not be sufficient to enable adequate flow of pedestrians. The Pedestrian Comfort Level tool should be used to determine appropriate footway widths based on the number of pedestrians per square metre and pedestrian flows per minute.

19.34 Part 3(e) requires developments to be inclusive-by-design, considering the needs, comfort, accessibility, and safety of all users. Safety can be described as a spectrum of exclusion, which can be experienced in the form of mild inconvenience, significant discomfort, to severe danger. This is more commonly experienced by women, girls, and gender diverse people; from the inconvenience of having to carry pushchairs and small children up flights of stairs, or struggling to find a public bathroom; or feeling uncomfortable taking certain routes home at night, to being threatened by verbal harassment and physical violence. The intersection of marginalised identities can compound and exacerbate experiences of exclusion from the public realm, while also considering that the lived experiences of women, girls, and gender diverse people is incredibly varied. Ultimately, streets that are inclusive-by-design will improve the experiences, comfort, and safety for all users.

19.35 In addition, to minimise potential risk of conflict or collision



between users, where possible pedestrian footways and cycle lanes should be clearly designed to be perceived as separate facilities, and mixing pedestrian and cyclist should be avoided. This is particularly important to protect vulnerable road users, for example, those who may not be able to see or hear an approaching cyclist. Best practice guidance such as the DfT Inclusive Mobility Guidance should be followed.

19.36 Part 3(f) requires development proposals to support the uptake of cycling in Tower Hamlets. Safety and perceptions of safety is often cited as a key reason why people choose not to take up cycling, with particular risk from heavy traffic, HGVs, and hostile motorists.

19.37 To overcome this, cycling routes, networks, and facilities should be designed to a high quality as outlined in the Healthy Streets Approach, with clear separation from pedestrian and motor traffic where possible.

19.38 Part 4 requires development to ensure the safety, accessibility, legibility, connectivity, and convenience of the borough's walking and cycling network to help ensure we meet the aims related to active travel aims and creating a sustainable and healthier transportation options for individuals and communities.

London Plan policies:

- GG3 Creating a healthy city
- T2 Healthy Streets
- T5 Cycling

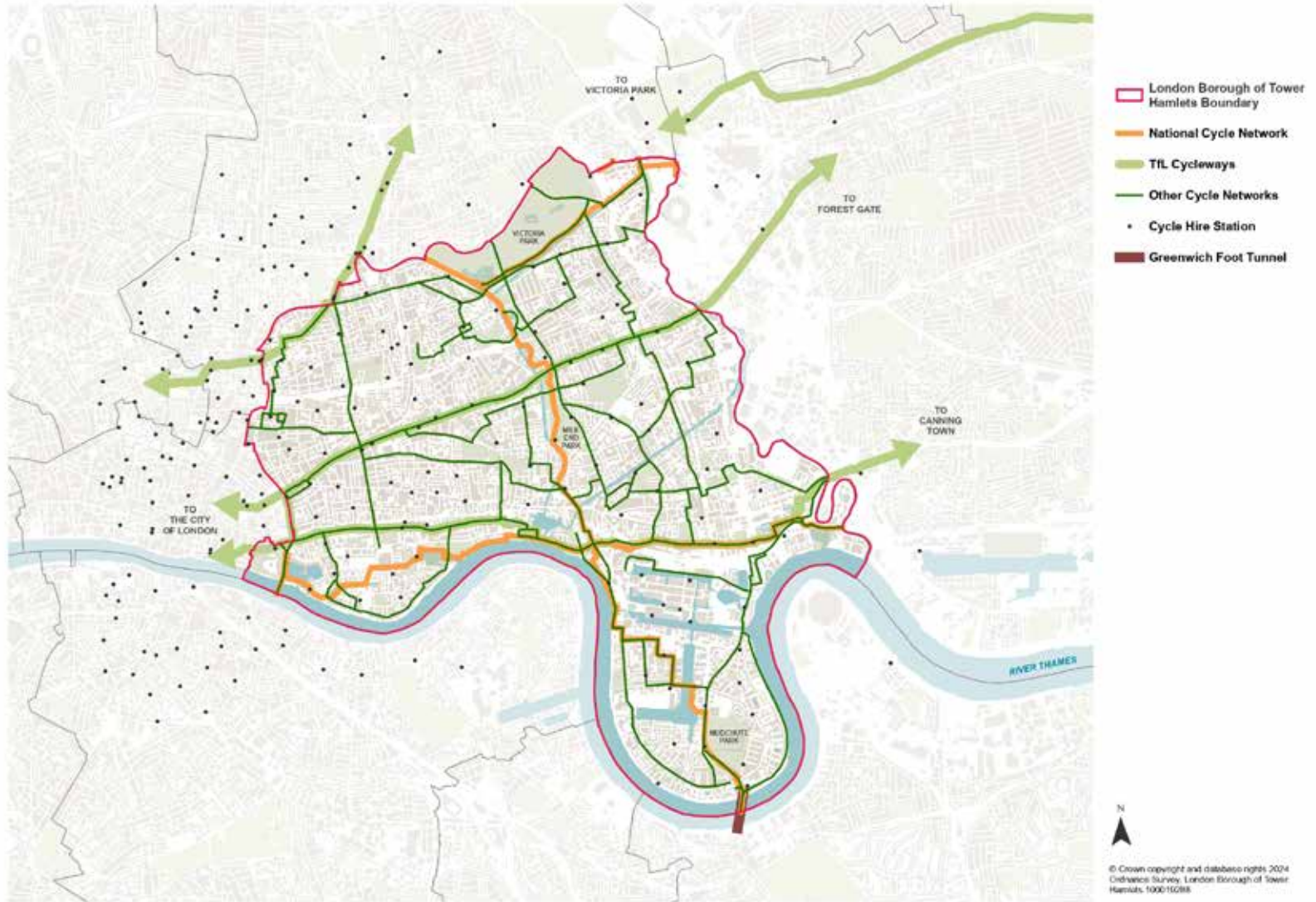
Local Plan policies:

- CG9 Air quality
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- BO2 Open spaces and the green grid network

Evidence base:

- Mayor's Transport Strategy
- Sustainable Transport, Walking and Cycling LPG, 2022
- Tower Hamlets Transport Strategy, 2019-2041
- Healthy Streets for London, 2017
- Active Design Guidance (Sport England) 2023
- Inclusive Mobility (DfT) 2021
- Gender Inclusive Design, 2023
- London Cycling Design Standards (LCDS), 2014
- Pedestrian Comfort Guide, 2019
- Cycle parking implementation plan, 2019
- New cycle route Quality Criteria, 2019
- Tower Hamlets – A Cycling Borough, 2016

Figure 21: Map of the cycle network



Policy MC3 Impacts on the transport network

1. Development proposals must ensure impacts on the transport network are mitigated and avoided. This will be achieved by ensuring that:
 - a. impact to the transport network is reduced by promoting and enabling active and sustainable travel; and
 - b. environmental impacts are reduced, including reducing congestion, emissions, and improving air quality and public health.
2. Major development proposals and any development that is likely to have a significant impact on the transport network are required to submit a transport assessment or transport statement, and/ or travel plan as part of the planning application. Transport assessments should focus on embedding the Healthy Streets Approach within and around new developments. Transport assessments should be accompanied by an Active Travel Zone (ATZ) assessment, as well as a Night-time ATZ assessment where necessary.
3. Development proposals that will have an adverse impact to traffic congestion on the highway network and/or the capacity and function of the transport network will be required to contribute and deliver appropriate transport infrastructure and/or effective mitigation measures.

4. Development proposals will be required to demonstrate, in accordance with TfL's latest Construction Logistics Plan Guidance and the Tower Hamlets Code of Construction Practice (CoCP), that any impacts on the transport network during the construction phase of the development will be managed and mitigated.
5. Development proposals will be required to demonstrate that proposals will not result in any detrimental impact on road safety.
6. Development proposals are required to support the delivery of, and safeguard land required for, future strategic transport schemes, as well as protect and enhance existing transport infrastructure. Development proposals that would prevent the delivery of future strategic transport schemes will not be supported.

Supporting text

19.39 This policy seeks to address the impact that development has (both individually and cumulatively) on the transport network, particularly issues of congestion, air quality, severance, safety, and accessibility for cyclists and pedestrians. It sets out how development proposals should assess the severity of impact it has on existing transport infrastructure and services, including the approach taken to mitigate any adverse impact on capacity, connectivity, and congestion.

19.40 Tower Hamlets has a high-density of strategic roads designed to carry high volumes of traffic through and within the borough, which has a severe impact on air quality, traffic congestion, and road danger.

19.41 Congestion levels in many parts of the borough are severe, and the interconnectedness of the highway network – whether local or strategic – plays a significant role in contributing to this congestion. A development's impact on congestion is not just a matter of building size but depends on its location, use, design, density, and operational factors (for instance, a relatively small development could be judged to have a severe impact if it generates a high number of vehicle trips and/or is in a sensitive location). Given the significant capacity constraints on the public transport and highway network, any development that generates a net-increase in vehicle trips has the potential to have a severe impact on the safety and operation of this network within Tower Hamlets.

19.42 Part 2 seeks to ensure applications provide an independent, objective, and accurate transport assessment or transport statement appropriate to the scale of development. A transport assessment or statement must be prepared in accordance with the latest guidance from Transport for London. The level of detail required will be dependent on the type and scale of the development. Applicants

should seek pre-application advice to determine whether a transport assessment or statement will be required. A transport assessment should be submitted with a draft construction management and logistics plan and a delivery and servicing plan.

19.43 A transport statement is a simpler document that identifies the likely transport impacts of a proposal and seeks to mitigate the negative transport impacts of development in order to promote sustainable development. A transport statement may be accompanied by a construction management and logistics plan or a delivery and servicing plan depending on the type of land use and its location; this should also be established and scoped out with our transport and development management teams at the pre-application stage.

19.44 Transport assessments and statements will be required to provide detailed information on the range of transport users and modes, including the movement of people and goods, both before and after a proposed development has been constructed. A transport assessment or statement should identify and address transport impacts on all modes of transport and set out the measures to avoid, remedy or mitigate identified impacts of the development.

19.45 Where transport assessments are required, they should be accompanied by an Active Travel Zone (ATZ) assessment. The ATZ should identify and assess key routes to major trip attractors, using latest TfL guidance. It should also consider evening/night-time use, and the safety of marginalised or vulnerable groups, including women, girls and gender diverse people, children and older people, and people with disabilities.

19.46 Applicants should submit a travel plan alongside the planning application, where appropriate. The requirement for a travel plan should

be agreed with relevant teams such as the council's highways team, school team and Transport for London (TfL) before an application is submitted. TfL provides guidance that sets out the requirements for travel plans. Such plans must promote and provide a long-term strategy to meet sustainable transport objectives. They should contain a package of measures that will seek to minimise the number of trips undertaken by private car (e.g. restricting car parking provision), encourage use of sustainable transport and generally reduce the need to travel to and from the development. Travel plans must set targets, objectives and provide detail on implementation, funding, and monitoring. This will be secured as a planning obligation for major development proposals and as a condition on minor development proposals.

19.49 Part 3 seeks to ensure that development does not exacerbate or overload transport networks through trips associated with its uses. Where appropriate, conditions and/or planning obligations will be sought to secure mitigation measures required to make a development acceptable. This is in addition to CIL contributions which fund transport infrastructure improvements on a borough-wide scale. All contributions towards new transport infrastructure improvements must be in accordance with Policy DV5 and the Planning Obligations SPD.

19.48 Areas in the borough anticipated to accommodate higher levels of the population and economic growth such as the Isle of Dogs and City Fringe are where existing highway and/or public transport demand is already close to or exceeding supply during peak travel times. Other areas of the borough also experience local highway or public transport stress during these times. Development that increases demand without appropriate mitigation (including infrastructure contributions to service improvements and/or delivering effective modal shift) will not be supported.

19.49 Part 4 requires development proposals to demonstrate that any impacts on the transport network during the construction phase of a development will be managed and mitigated. Traffic generated by construction and demolition of all scales is a significant contributor to poor air quality throughout the borough and can also significantly impact on the flow of traffic, road safety, and pedestrian convenience.

19.50 Applicants are required to provide a Construction Management Plan, including details of any demolition works, and a Traffic Management Plan, as per the Tower Hamlets CoCP. For major developments a Construction Logistics Plan is also required.

19.51 Part 5 seeks to support the Mayor of London's Vision Zero objectives. The aim of Vision Zero is to eliminate all deaths and serious injuries on London's transport system. Road safety is fundamental to the creation of healthy streets, where all users feel safe while walking, cycling, and using public transport.

London Plan policies:

- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts

Local Plan policies:

- DV4 Planning and construction of a new development
- CG9 Air quality

Evidence base:

- Mayor's Transport Strategy, 2022
- Strategic Transport Assessment, 2016
- Tower Hamlets Transport Strategy, 2019-2041
- LBTH Code of Construction Practice, 2023

Policy MC4 Parking and permit-free

1. Development proposals must prioritise sustainable approaches to parking in areas that have, or will have good public transport accessibility, in order to support the delivery of healthy, safe, liveable neighbourhoods, and consider the needs of the wider community.
 - a. In line with the London Plan, car-free development should be the starting point for all development proposals;
 - b. for areas with a PTAL rating between 1-3, residential developments have regard for the maximum car parking standards set out in the London Plan;
 - c. residential car parking will not be supported in the borough's Opportunity Areas, the Central Activity Zones (CAZ), Metropolitan and Major town centres, and any areas with a PTAL rating of 4 and above, except from providing required Blue Badge parking spaces for disabled people in accordance with London Plan Policy T6.1;
 - d. disabled parking spaces in residential developments must be reserved for use by Blue Badge holders who are occupiers of wheelchair accessible homes within the development. Disabled parking spaces must not be sold or leased to other residents;
 - e. residential development is required to be permit-free in terms of on-street car-parking, with any parking associated with a development to be located off-street;
 - f. designated parking spaces for car clubs will only be supported where it can be demonstrated that car club use would reduce the overall car-use of the development and there are active charging facilities;
 - g. development proposals for specialist and supported housing should provide short stay parking bays which must be restricted to support and care services needed by residents; and
 - h. car parking for commercial or industrial uses will only be permitted where it has been demonstrated to the council to be essential to the operational requirements of the business of service, and must be the lowest justified quantity. Car parking for staff will not be permitted.
2. All new or re-provided parking spaces (in residential and non-residential development) should be equipped with active electric vehicle charging facilities.
 - a. When located on pavements, electric vehicle (EV) charging points should be integrated into the streetscape design and should not obstruct pedestrian movement. Where practicable, installation of EV charging points in the carriageway is preferred.
3. All new development proposals must deliver high-quality cycle parking in line with the London Plan and the London Cycling Design Standards. Developments will be required to ensure:
 - a. cycle parking is well-located, safe, secure, and accessible, and provide a balance of short-stay and long-stay provision;
 - b. cycle parking and storage caters to all types of cycles, including bicycles, adapted cycles, e-bikes, and cargo bikes, and;
 - c. complementary facilities to support cycle use are provided where appropriate, including accessible showering and changing facilities, storage lockers, and basic maintenance equipment such as bike pumps.
4. Where suitable, developments should provide or contribute towards new or expanded publicly accessible shared cycle hire facilities.

Supporting text

19.52 This policy seeks to ensure that new developments adopt a sustainable approach to managing parking, to prioritise land uses such as housing, facilitate sustainable travel patterns, address congestion and poor air quality, and respond to the needs of the community.

19.53 Car parking takes up large amounts of space and can reduce the area available for development, can put pressure on the public realm that otherwise could benefit all residents by providing increased space for outside amenity space, parks, and urban greening. Where parking is provided in basement accommodation, this can add to the cost of a development and impact the viability of a scheme. However, it is noted that the use of cars can support community members who rely on their vehicle for work, mobility, or other important and necessary reasons.

19.54 Part 1(a) sets out that a car-free approach is required in areas of Tower Hamlets where there are good levels of existing or planned public transport accessibility and where there is significant residential growth expected in the coming years. Furthermore, in line with the London Plan, all development proposals within the borough's Opportunity Areas, CAZ, Metropolitan and Major town centres must be car free. Where there are high levels of public transport accessibility, alternative modes of transport will be promoted.

19.55 When applying the residential parking standards from the London Plan, development proposals should consider future changes to public transport accessibility levels (PTAL) as a result of new infrastructure provision, particularly in areas of low public transport accessibility (PTAL 1 and 2).



19.56 Part 1 (b) recognises that in areas of low public transport accessibility, some residents, businesses, and organisations rely on private vehicle use as their only transport option, to provide care to family members, or as a primary source of income. If car parking is deemed essential, it must be justified in the transport assessment and provided entirely on-site. Likewise, if parking can be considered essential for certain commercial or industrial uses, the amount provided must be of the lowest possible quantity.

19.57 Parking may be required for those with rely on private vehicles for

mobility, accessibility, or wheelchair needs. Part 1(d) requires accessible parking bay provision to be provided even in developments which are otherwise car-free, with minimum numbers provided in accordance with London Plan policy T1.6.1- T6.5. This parking must be safeguarded for use by Blue Badge holders, and cannot be leased or sold to other residents.

19.58 Part 1 (e) sets out that all residential development parking must be permit-free, and any parking required must be provided on-site and off-street. This will be secured by planning obligation. The required accessible parking spaces are exempted from this requirement.

19.59 Demand for on-street parking can create a significant amount of stress across the borough's street network. This demand has also increased significantly in recent years due to population growth. In addition, the issue of on-street parking outside of controlled hours (usually overnight and at weekends) often overcrowds streets, resulting in unacceptable safety and accessibility issues for vulnerable road users; as well as restricting traffic flows, delaying busses, and increasing journey times.

19.60 Part 1 (f) sets out that in some instances, car clubs can be cheaper alternatives to individual car ownership and allow for occasional car use while also discouraging shorter car journeys. However, car clubs can encourage car usage over more sustainable transport modes and share many of the negative impacts of private car ownership. Designated parking spaces for car clubs will only be supported where it can be demonstrated that car club use would reduce the overall car-use of the development. Spaces allocated for car clubs are included in the overall maximum allowance of permitted car-parking spaces. Any car club spaces should have active charging facilities.

19.61 Part 1 (g) recognises that in some instances, short-term parking for specific uses, such as specialist and supported housing, are essential for the function or operational requirements of the development. Where on-street drop-off or other essential parking is proposed, the need for specific parking spaces must be demonstrated.

19.62 A Parking Design and Management Plan that outlines how parking will be designed, managed, and enforced must be submitted with all applications that include car parking provision, in line with Transport for London Guidance.

19.63 Part 2 requires all parking spaces provided as part of a new development should be fitted with electric vehicle (EV) charging points. This goes significantly beyond the London Plan requirement of at least 20% parking spaces to have electric charging, with passive provision (the infrastructure capacity to install electric charge points at a later date) serving the remaining spaces.

19.64 However, taking into consideration the UK Government's commitments to end the sale of new combustion engine vehicles by 2030, it is justified to maximise the provision of electric vehicle charge points to have necessary infrastructure in place to support the transition to low-emissions vehicle use over the next decade. As per the Tower Hamlets Electric Vehicle Delivery Plan (2021-2025) accelerating the switch to electric vehicles will require potential users to feel confident that there is an adequate number of charging points and that are conveniently located to meet their needs. Passive provision is not considered appropriate, as there is no longer a question of if or when the demand for EV charge points will increase. Responsibility for installing them should be taken on now, to avoid dispute in the future over who has responsibility for upgrading all car parking spaces in development.

19.65 As per London Plan Policy T6, EV charging points should be integrated into the streetscape design and should not obstruct pedestrian movement. Where practicable, installation of EV charging points in the carriageway is preferred.

19.66 Part 3 requires all new developments to deliver high-quality cycle parking in line with the London Plan and London Cycling Design Standards. Around 80% of Tower Hamlets residents live in flats, and much of this accommodation has extremely limited cycle parking, cycle storage or cycle hire docking space. A lack of appropriate cycle parking and storage facilities is often cited as a barrier to cycle use and ownership. Applicants and developers to the detailed parking standards for vehicles and bicycles in. A sufficient amount of cycle parking should be provided to accommodate current demand and to encourage further use over time. Design of cycle parking has been extensively covered in the Transport for London's Cycle Design Standards and developers are required to take account of this when designing cycle facilities. Development proposals are required to provide cycle parking at least in accordance with the minimum standards as set out in Table 10.2 in the London Plan.

19.67 However, even in instances where cycle storage is currently provided, these facilities are not well-used: in a residents' survey undertaken for the Tower Hamlets High Density Living SPD, 76% of respondents reported never having used cycle storage in their building, and a further 26% of residents who own a bicycle responded that they stored it within their home, instead of the communal storage. This was largely attributed to accessibility of bike storage and perceptions of safety.

19.68 Both long- and short-term cycle parking provision must be

designed to the highest standard, taking into consideration the needs of all users, to help encourage the take-up of cycling in the borough. Providing cycle parking must not be seen as a tick-box exercise to provide required quantity at the expense of quality; for example, while stacked two-tier cycle racks can provide a large amount of storage in a limited space, they are only suitable for standard two-wheel bikes and can require significant upper-body strength to use. Consideration should also be given to a variety of users and mobility options, such as space for non-standard cycles, mobility scooters, and cargo bikes.

19.69 To increase cycle uptake by offering greater flexibility for residents, minimum cycle storage requirements should be provided in different locations. Preferably cycle storage should be located in the vicinity of a more active usage, such as the street or lobby. Indoor cycle storage should be fully accessible for all users, have step-free access via a ramp or direct lift, with suitably wide automated doorways to accommodate all types of cycle.

19.70 Furthermore, short-term cycle parking in key delivery destinations should include provision for accessible cargo-bikes, e-bikes, and e-mopeds (with charging facilities) to support the growth of cycle and last-mile logistics operations.

19.71 Part 4 requires developments to provide, or financially contribute to, publicly accessible cycle hire facilities as part of the development, where suitable. To increase access to cycling in the borough, the council is working closely with the Mayor of London and Transport for London to extend the existing Santander Cycle Hire scheme with new docking stations in appropriate locations. Where appropriate, development will be expected to safeguard land within the site where Transport for London has identified a need to accommodate publicly accessible

shared cycle hire stations. In addition, dockless cycle hire schemes run by private operators are becoming increasingly popular within the borough. The provision of cycle hire schemes should be managed to ensure that docking stations and cycles do not result in a cluttered public realm, which would adversely impact safety, accessibility of pedestrian movement.

19.72 To support increased cycle use and particularly cycling to work, new office developments should include complementary cycling amenities where appropriate, such as accessible showers, changing rooms, and storage lockers.

19.73 This policy should be read in conjunction with Policy MC5 and London Plan Policy T6 to ensure that along with on-site parking provision, development provides adequate delivery and servicing facilities within the site as well as encouraging shared servicing arrangements and timing of deliveries.

London Plan policies:

- T5 Cycling
- T6 Car parking

Local Plan policies:

- DV7 Utilities and digital connectivity
- CG9 Air quality

Evidence base:

- Mayor's Transport Strategy
- Cycle parking implementation plan, 2019
- Strategic Transport Assessment, 2016
- Tower Hamlets Transport Strategy, 2019-2041
- Tower Hamlets electric vehicle delivery plan: 2021-2025
- East of the Borough Transport Study, 2020
- Tower Hamlets High Density Living SPD
- Tower Hamlets Sustainable Freight, Servicing, and Delivery (2024)

Policy MC5 Sustainable delivery, servicing, and construction

1. New development proposals should facilitate sustainable freight through water, rail, and road. They should also encourage safe, low emission and efficient delivery and servicing, particularly through 'last-mile distribution' and active travel. Delivery and servicing requirements should be considered at the early stages of the design-led approach, with sufficient space allocated off-street and integrated within the site boundary to accommodate growth and future demand.
2. New development proposals should use zero emissions vehicles for servicing wherever possible and consolidated deliveries are expected to be of this type. Servicing by cycle and other non-motor vehicular modes should be used wherever possible. Any loading bay required for a development should be supplied with an electric vehicle rapid charge point to allow zero emissions vehicles to operate from the bay.
3. Development proposals that generate a significant number of vehicle trips for goods or materials during its construction and/or operational phases are required to submit a Construction Logistics Plan and/ or Delivery and Servicing Plan as part of the transport assessment. This should demonstrate how:
 - a. impact to the transport network and amenity will be avoided, remedied or mitigated;
 - b. delivery of goods and servicing will be provided within the site to encourage shared arrangements and timing of deliveries;
 - c. movement by water and/or rail and the use of low emission vehicles, electric vehicles, bicycles and freight consolidation facilities have been prioritised;

- d. where possible, development will use existing consolidation and distribution facilities to minimise the number of trips required to service the site, and smart or joint procurement measures will be considered to reduce the numbers of deliveries and servicing trips as should the use of micro-consolidation centres; and
 - e. new micro-consolidation centres will be provided within developments where appropriate.
4. Development proposals adjacent to safeguarded wharves, rail depots and bus depots are required to ensure they do not compromise their operation in line with the 'Agent of Change' principle.
5. Development proposals that provide new or improved wharves or other facilities for freight transfer between road, rail or water will be supported where they:
 - a. minimise impacts on the environment and neighbouring amenities;
 - b. support modal shift; and
 - c. facilitate the use of zero or low emissions vehicles.

Supporting text

19.74 Deliveries and servicing are essential to the economic growth of the borough. In recent years, we have seen a surge in demand for e-commerce and home delivery services, which combined with continued population growth, is driving an increase in vehicle trips across London. Fuelled in part by changing behaviours during the COVID-19 pandemic, customer expectations have also changed, with deliveries expected to be fulfilled in a matter of hours, rather than days or weeks. Typical freight and delivery vehicles are some of the most polluting vehicles on our roads. Increased delivery demand is contributing to increased traffic congestion, air pollution, and could result in obstructions to local and strategic roads while loading and unloading of goods takes place, which could impact bus journey times and access for emergency service vehicles. Furthermore, the projected growth and development in the borough will increase the demand for building materials, which, if not carefully managed, which result in increased construction traffic, air pollution, noise, and dust.

19.75 This policy seeks to address the challenges the borough faces in ensuring the efficient, safe, timely and sustainable movement of goods and materials across the borough, while also seeking to improve air quality and reduce impacts arising from the freight network such as accidents, spillages, or wastes.

19.76 As the proportion of cyclists and pedestrians has increased, pedestrian and cycle safety has become an area of increasing concern in Tower Hamlets, particularly given the rise in fatalities on busy arterial roads. Across London, nearly two-thirds of cyclist deaths and around a quarter of pedestrian deaths involve a heavy goods vehicle. This policy seeks to reduce the impact of delivery, servicing, and construction traffic



on the environment and the health and well-being of residents in terms of noise disturbance and its contribution to road congestion and air pollution.

19.77 Part 1 seeks to support the aims of the Tower Hamlets Transport Strategy (2019-2041) to maximise the use sustainable transport methods for freight, making use of the rivers and waterways where practicable for business cargo and freight delivery.

19.78 Part 2 seeks to encourage the use of zero emissions vehicles wherever possible for deliveries. This includes deliveries by cycle,

cargo-bike, and other non-motor vehicles. Loading bay requirements for developments should be supplied with EV rapid charge points to allow for zero emissions vehicles to operate and recharge on delivery routes.

19.79 Part 3 ensures that development generating a significant number of vehicle trips for goods or materials will be assessed in relation to its likely impact on the transport network, with reference to the most up-to-date Transport for London guidance relating to deliveries, servicing, and construction logistics. An assessment will also be required where a development has the potential to have a significant impact on the transport network. The level of assessment required will be decided through the development management process.

19.80 Development proposals will need to plan and manage its freight movements through the construction and operational phases of the development. Construction management plans and/or delivery and servicing plans are required to show how the Construction Logistics and Community Safety (CLOCS) standard has been incorporated and that fleets serving the site have Fleet Operator Recognition Scheme (FORS) silver accreditation. In addition, development will need to provide sufficient space for deliveries and servicing within the site curtilage and off the public highway, including refuse collection.

19.81 Development proposals must seek to prioritise sustainable methods in the movement of goods and services, particularly sites with significantly greater delivery and servicing frequencies and sizes. Construction can make significant environmental and cost savings through more sustainable methods of recycling existing materials; this can significantly reduce freight movements by vehicles such as tipper trucks which tend to be more polluting and more hazardous to cyclists compared to other vehicles.

19.82 Part 3 (b) seeks to ensure that the delivery of goods and servicing will not take place on-street wherever possible, to avoid negative impacts on highway safety and traffic flow. In addition, off-peak deliveries and servicing operations should be considered where appropriate to reduce motor traffic and road danger, minimising the impact of servicing at the busiest times, particularly in areas of high footfall. In these cases, quiet delivery agreements should be considered.

19.83 Part 3(d) requires development to minimise the number of daily vehicle trips to and from the site. by consolidating and coordinating deliveries and servicing. Residential development will require bespoke management and delivery accommodation when compared to commercial development. The rapid acceleration of internet shopping has resulted in a significant growth of smaller light goods vehicles, which increase congestion and pollution at peak times as well as traditionally quieter times. Delivery vehicles to residential addresses often park on the highway causing traffic flow and safety concerns. This disruption increases with missed deliveries whereby the same address receives a second or third delivery attempt. Development should provide space for these deliveries and help ensure all such deliveries are completed on the first attempt.

19.84 The Tower Hamlets Sustainable Freight Study (2023) concluded that the use of a construction consolidation centre can help reduce and control the number of deliveries to site by up to 50%. Holding areas located on nearby vacant sites can be used to control the number of construction deliveries and vehicles dwell times.

19.85 Parts 4 and 5 requires developments adjacent to safeguarded wharves to recognise the role of wharves and depots, and ensure that their continued function is not negatively impacted. The borough's river and rail network represent an underused resource and priority should

be given to utilising the railways, rivers, and canals to facilitate the movement of waste and goods, particularly the safeguarded wharves such as Northumberland Wharf and Orchard Wharf.

London Plan policies:

- S115 Water transport
- T7 Deliveries, servicing and construction

Local Plan policies:

- Policy DV4 Planning and construction of new development
- Policy CG9 Air quality
- Policy CG10 Noise and vibration

Evidence base:

- Mayor's Transport Strategy
- Mayor of London's Freight and Servicing Action Plan, 2019
- Mayor of London's Vision Zero Action Plan, 2018
- Construction Logistics Plans Guidance, 2021
- Delivery and Servicing Plans Guidance, 2020
- Tower Hamlets Transport Strategy, 2019
- Tower Hamlets 'Code of Construction Practice (CoCP), 2023
- Tower Hamlets Sustainable Freight, Servicing, and Delivery (2024)

20. Reuse, recycling and waste



RW1 – Managing our waste

RW2 – New and enhanced waste facilities

RW3 – Waste collection facilities in new development

Introduction

20.1 The management of waste is one of the most challenging issues facing Tower Hamlets. To address this the Council has brought the collection and management of household waste under its direct control, declared a waste emergency and developed a detailed management strategy for local authority collected waste. The borough will continue to have significant population and development growth in the coming decades and this is expected to give rise to a growing quantity of waste to be managed, from homes, businesses and construction work. The Council wants to ensure that as much of this waste as possible is, reused, recycled, and has value extracted from it while facilitating a shift towards a circular economy where the quantity of waste produced falls.

20.2 As a unitary authority Tower Hamlets performs the roles of waste planning authority, waste collection authority, and waste disposal authority in the borough. In our capacity as a waste planning authority, we have a statutory duty to prepare a waste local plan in line with legislation. This is being fulfilled through the inclusion of waste policies in this Local Plan. A key purpose of these policies is to ensure waste produced in the borough is properly managed through

access to suitable management facilities. These policies have been prepared within the context of the requirements of the London Plan, with particular focus on the requirement to provide for quantities of household and commercial and industrial waste apportioned and the management targets set.

20.3 The management of waste rarely respects administrative boundaries and hence waste is considered to be a strategic cross-boundary issue and is subject to the duty to co-operate³⁵. In the interests of proper planning and sustainable development Tower Hamlets, through the duty co-operate mechanism, will seek to secure access to sufficient waste management capacity to meet the borough's apportionments as set out in the London Plan and ensures construction, demolition and excavation waste is also properly managed. We will support the transition to the circular economy through the establishment of Material Hubs. Material Hubs can be used to store otherwise unused material which can be reused, repaired, or repurposed within or outside the borough. It is expected that Materials Hubs will be initially trialled in the early part of the plan period and scale up in the medium to long term reducing the quantity of construction and demolition waste requiring management in particular.

20.4 The LLDC is currently the planning authority for part of the borough of Tower Hamlets, but it does not have a separate apportionment. The Council is therefore planning for waste across its whole administrative area. We will continue to work closely with the LLDC on delivering our strategic plan for waste.

20.5 Our duties as a waste collection authority and waste disposal authority include helping households to prevent waste as well as reuse items and recycle as much waste as possible. The London Plan sets a

³⁵ Tower Hamlets Waste Data Update – Identification of Strategically Significant Cross Boundary Waste Movements BPP Consulting June 2024

target of recycling 65% of municipal waste by 2030 and zero biodegradable waste to landfill by 2026. However, in 2021/2022, only 20% of household waste was reused, recycled, or composted in Tower Hamlets and it is recognised this needs to increase for those targets to be met.

20.6 Whilst London boroughs have not been set individual targets, Tower Hamlets is working towards meeting the London-wide target. The design of new development is required to ensure integrated waste collection and bulking systems are included which contribute to the borough's ability to implement the waste hierarchy and increase recycling/ composting rates (see Policy RW/3).

20.7 The Local Plan must identify sufficient opportunities to meet the identified needs of an area for the management of waste, aiming to drive waste management up the Tower Hamlet's waste hierarchy (see Figure 22). The Council is required to plan for seven waste streams, including household, business, and construction waste. The London Plan 2021 requires boroughs to provide sufficient capacity to manage the tonnages of household and commercial/industrial waste apportioned in the London Plan 2021. The intention is for London to be net self-sufficient in managing all waste, other than excavation waste, by 2030.

20.8 The following tonnages of waste are predicted to arise from Tower Hamlets over the Plan period:

Table 13: Tower Hamlets' waste capacity need 2026-2041 (tonnes)³⁶

Waste stream	2026	2031	2036	2041
Apportionment (LACW and C&I)	197,000	199,000	203,000	207,000
Non hazardous C,D&E waste	286,000- 303,260	286,000- 323,290	286,000- 329,000	286,000- 337,2000
Hazardous waste included in LACW, C&I apportionment. Overall arising predicted to be c16,200 tpa ³⁷				
All other waste streams	0	0	0	0

20.9 Providing for the predicted arisings within the constraints of the borough presents a particular challenge because parts of the borough are densely built-up and there are competing pressures from higher value land uses such as meeting housing and employment land needs.

³⁶ Derived from Table 9.1 of the London Plan 2021

³⁷ Tower Hamlets Waste Data Update – Management requirements for Hazardous Waste in Tower Hamlets to 2042 BPP Consulting June 2024

20.10 The London Plan also has a target of 95% reuse/recycling/recovery of Construction and Demolition waste and 95% beneficial use of excavation waste overall and 100% of inert excavation³⁸. The available evidence indicates that Tower Hamlets is likely to be meeting these targets although the data is not definitive.³⁹

20.11 Tower Hamlets is also required to plan for hazardous waste, wastewater, agricultural waste, and low-level radioactive waste. The evidence concludes that no additional facilities are required within the borough for these waste streams because they are only produced in very small quantities and/or they are managed at specialist facilities outside the borough.⁴⁰

20.12 Capacity offered by existing waste sites in the borough has been assessed to be insufficient to meet the management needs for C&D waste arisings in particular. It is estimated that an area of approximately 0.65 to 1 hectare would be required to provide sufficient capacity to manage this waste⁴¹.

20.13 To continue to provide for the London Plan apportionments for household and business waste, Tower Hamlets will safeguard existing waste sites, identify suitable land where facilities offering additional capacity may be located under Policy RW1 and work with the GLA and other boroughs to secure access to suitable capacity elsewhere in



London. Policy RW2 will guide the development, delivery and operation of facilities offering additional waste management capacity within the Borough.

³⁸ London Plan Footnote 164.

³⁹ Tower Hamlets Waste Data Update – Management requirements for Construction, Demolition and Excavation Waste in Tower Hamlets to 2042 BPP Consulting June 2024

⁴⁰ Tower Hamlets Waste Data Study 2023 Vitaka

⁴¹ Tower Hamlets Waste Data Update – Management requirements for Construction, Demolition and Excavation Waste in Tower Hamlets to 2042 BPP Consulting June 2024

20.14 Policy CG5 – Retrofit and the Circular Economy will ensure that construction and demolition waste continues to be utilised as a resource in the construction and regeneration of new development in the borough and London. The Council will explore opportunities to take waste management in house or work in partnership in order to maximise the extraction of resources and financial returns from the waste the borough generates.

20.15 The borough is not allocating individual sites for waste but instead identifying areas of search within which individual sites could come forward; this approach is supported by both national policy and the waste industry. The total amount of suitable industrial land in the borough is just under 22 hectares. It has been calculated that up to 5.28 hectares of land could come forward within the areas of search for new waste management sites (see Policy RW1) through business turnover and vacancies⁴². The assessment of existing waste management capacity evidences that the safeguarded existing waste sites along with the areas of search should be sufficient to serve the Borough’s projected waste management needs⁴³.

20.16 The Council will continue to monitor arisings of waste, the availability of land capable of providing additional waste capacity within the Borough and the continued availability of suitable capacity elsewhere in London over the course of the Local Plan period.

⁴² See Appendix 2 of Tower Hamlets Waste Data Update – Management Requirements for Construction, Demolition & Excavation Waste in Tower Hamlets to 2042 for examples.

⁴³ Tower Hamlets Waste Data Update – Management Requirements for Construction, Demolition & Excavation Waste in Tower Hamlets to 2042 + Management Requirements for Apportioned HIC Waste in Tower Hamlets to 2041 BPP Consulting June 2024

⁴⁴ Tower Hamlets Waste Data Update – Management Requirements for Apportioned HIC Waste in Tower Hamlets to 2041 BPP Consulting June 2024

Capacity Assessment

20.17 The figures below set out the findings of an assessment of the potential capacity of existing waste management facilities provided in Tower Hamlets.

Table 14: Capacity Assessment of Existing facilities managing apportioned waste in Tower Hamlets (tonnes per annum⁴⁴)

Capacity source	LACW/C&I management capacity
Existing licensed waste sites	160,000tpa
Exempt waste sites	40,000tpa
Onsite segregation facilities	17,600tpa
Total assessed capacity	217,600tpa
Total potential capacity	217,600tpa

20.18 When the value of c220,000 tpa is compared with the apportioned tonnages presented in Table 14 above, it shows that the assessed capacity ought to be sufficient to meet the apportionment requirement. However given the identified shortfall in capacity for the management of construction and demolition waste predicted to arise in the borough over the Plan period, it is still considered appropriate to identify areas of search where facilities offering additional waste management capacity may be developed, on a precautionary basis.

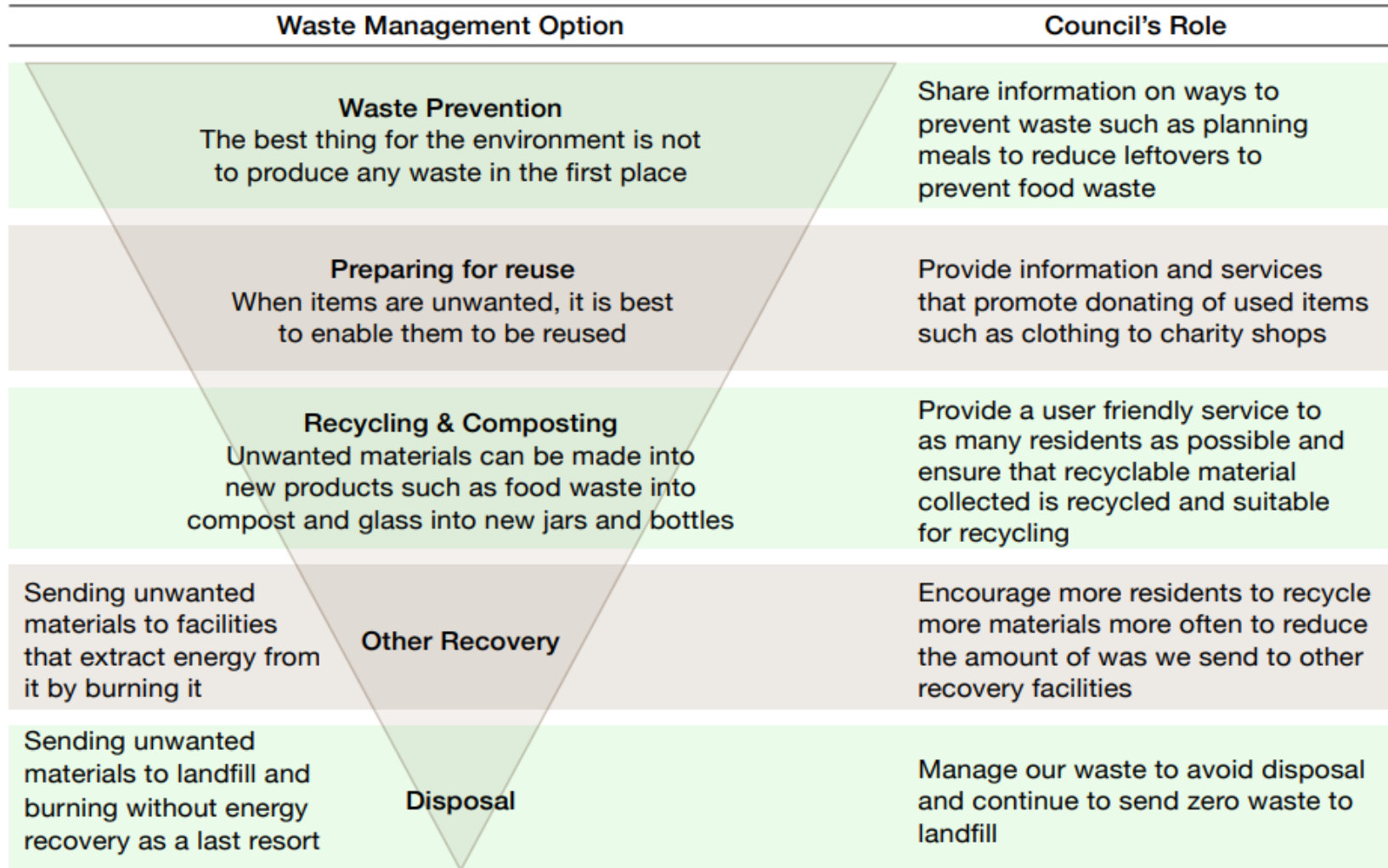
20.19 Areas listed in policy RW1 Managing our waste are considered to be suitable in principle to accommodate new waste management facilities. This is primarily due to their industrial nature and access to the strategic transport network so that waste and vehicle movements can avoid local roads and protect the safety and amenity of residents and heritage assets. Areas of search are not exclusively designated for waste management purposes as they are also considered to be suitable, in principle, for other uses that are considered appropriate for their respective policy designations.

20.20 Any proposals for new or extended waste management facilities in Tower Hamlets will be assessed against criteria in the National Planning Policy for Waste, the London Plan and Local Plan policies. The Council is actively exploring opportunities for the development of further waste management facilities to manage the Borough's waste through its waste management strategy.

20.21 The construction of new, extended or replacement of existing waste management facilities must include, where possible, technologies that seek to extract as much material and value as possible through the repurposing, recycling, storage, and management of waste. Where opportunities arise for synergies or partnerships with delivery of the Council's waste management services these will be explored.

20.22 The London Plan is seeking to move towards a future where goods are designed to be reused and recycled and very little waste will require disposal in the future (a 'circular economy'). Tower Hamlets will contribute to this approach in various ways (e.g. new developments will be required to recycle and reuse construction materials – see Policy RW1).

Figure 22: Waste Hierarchy Diagram



Policy RW1 Managing our waste

1. The following existing waste sites within Tower Hamlets (as shown on the Policies Map) are safeguarded for waste use over the plan period.

Table 15: Schedule 1: Existing waste sites in Tower Hamlets

Reference	Name/Location	Other designation(s)	Site area (hectares)	Operational capacity/ contribution to apportionment (tonnes per year)
1	Northumberland Wharf, Yabsley Street	Safeguarded Wharf	0.88	160,000
2	Ailsa Street		0.53	0/23,850 – 34,450

2. The following is the existing waste site in the London Legacy Development Corporation area (LLDC) and is subject to Planning Policies in the LLDC Local Plan.

Table 16: Schedule 2: Existing waste site in LLDC

Reference	Name/Location	Other designation(s)	Site area (hectares)	Operational capacity/ 5 yr peak(tonnes per year)
3	455 Wick Lane	LLDC Local Plan: Strategic Industrial Location and Preferred Industrial Location	0.47 (0.027 currently used for waste purposes ancillary to civil engineering works)	64,610

3. Development proposals which seek to maximise the efficiency and/or enhance the capacity of existing waste facilities in the borough will be supported.

4. Applications for non-waste uses on safeguarded sites or the reprovision of existing waste management facilities will only be permitted where it is clearly demonstrated and ensured through a legal agreement that compensatory capacity at least equivalent to, the maximum annual throughput that the existing site can achieve will be delivered on a suitable replacement site within the borough in the first instance or another part of London which provides.

5. Development proposals that prevent or prejudice the continued availability of capacity of these sites will only be supported where alternative capacity provision is made.
6. Areas in Schedules 3 and 4 are considered suitable for new waste management facilities (as shown on the Policies Map).

Table 17: Schedule 3: Areas of search for new waste sites in Tower Hamlets

Reference	Name/Location	Other designation(s)	Waste facility type	Site area (hectares)	Assessed potential capacity contribution (tonnes per year)
4	The Highway	Local Industrial Location	Reuse/ refurbishment/ repair	2.7 (of which an estimated 0.65 to become available over the plan period)	Up to 32,500
5	Empson Street	Strategic Industrial Location	Recycling, composting or recovery	10.07 (of which an estimated 2.42 to become available over the plan period)	Up to 121,000

Table 18: Schedule 4: Areas of search for new waste sites in LLDC

Reference	Name/Location	Other designation(s)	Waste facility type	Site area (hectares)	Assessed potential capacity (tonnes per year)
6	Fish Island	LLDC Local Plan: Strategic Industrial Location	Recycling, composting, recovery	9.21 (of which an estimated 2.21 to become available over the plan period)	Up to 110,500

7. Small-scale waste management facilities integrated within new developments outside of the Areas of Search listed in Schedules 3-4 may be acceptable where they contribute to managing apportioned waste and are of a scale and nature that does not compromise adjacent existing and proposed land uses.
8. New development will be expected to reuse and recycle construction, demolition, and excavation waste on or close to the site where it arises.
9. Development proposals in the vicinity of existing, safeguarded or consented waste management facilities must consider the agent of change principle to ensure the proposed use and operations do not constrain the assessed potential.

Supporting text

20.23 This policy seeks to support the development of a well-planned and integrated network of waste management facilities that provides for identified future capacity needs and contributes towards managing waste generated within the borough (and beyond) over the plan period.

20.24 Meeting this need will require the management of waste arising from new development to be provided for, retention of existing waste management facilities (operational and non-operational), and provision of additional facilities in identified Areas of Search and other suitable locations which comply with the criteria set out in Policy RW2 (and the development management criteria contained in this Local Plan). Proposals for waste management facilities within the Areas of Search will be guided towards locations within these areas so they are located as far away as possible from sensitive receptors (such as residential uses, schools, nurseries, and healthcare facilities) and mitigation measures are provided to ensure any significant detrimental environmental and amenity impacts are adequately addressed. Where existing facilities can be enhanced to maximise their use, subject to the requirements of Policy RW2, this will be encouraged.

20.25 The LLDC is the planning authority until December 2024 for those sites and areas of search within its boundary (as shown in Schedules 2 and 4). The LLDC Local Plan (2020-2036) safeguards existing waste sites (listed in Schedule 2) and identifies areas of employment land suitable for waste uses (listed in Schedule 4). To secure the delivery of an effective waste plan for the borough as a whole Tower Hamlets and the LLDC agree that the Area of Search listed in Schedule 4 is potentially suitable for waste management use. Acceptability of proposals for waste management uses in this location will be determined with reference

to policies within the LLDC Local Plan 2020 and any other relevant material considerations that apply to that proposal. Until December 2024 applications for planning permission in these locations will be determined by the LLDC.

20.26 The existing safeguarded waste site of Ailsa Street is within an area of regeneration and may be released for other uses, providing the requirements set out within Policy RW1 (see Part 4) are met.

20.27 Compensatory capacity will be sought which is at least equivalent to the maximum annual throughput over the last five years, where reported through the Environment Agency's Waste Data Interrogator. Compensatory provision should be provided locally within Tower Hamlets in the first instance, or failing that, elsewhere in London. Compensatory provision will be secured through conditions requiring proof of commencement of operation and operational capacity and a legal agreement at the planning permission stage.

20.28 Competition for land means the borough must look beyond traditional industrial locations when seeking space for facilities to manage its waste. There is an opportunity for innovative technologies to be incorporated into new development to manage waste generated over its lifetime. Part 7 of the policy therefore allows modern waste facilities to be integrated within new development outside the areas of search. Small scale facilities which come forward will be assessed on a case-by-case basis against criteria in Policy RW2 and regional and national policy.

20.29 On-site materials processing systems for food are an important aspect to consider in this borough due to the particular challenges to collection services within blocks of flats. The principle of these systems is two-fold:

- a. To carry out processing of materials at source, thereby reducing the tonnage and volume of solid waste to be managed and the subsequent burden on collection services; and
- b. To make use of valuable end products such as unlocking the energy held within the waste material itself.

20.30 There are a number of pieces of equipment, which may provide appropriate on-site waste processing including, but not limited to, micro digesters and composting units.

20.31 The flexibility of these systems is such that it reduces the need for separate collections of food waste to be carried out within the development and thereby reducing vehicle movements. Where such systems are proposed, it will be the responsibility of the managing agent to maintain the system/facility. An agreement will also need to be made with the Council with regards to securing the long-term availability of this capacity so it may be relied upon to contribute towards Tower Hamlets' apportionments prior to permission being granted.

20.32 Integrated waste collection systems are also required for new developments under Policy RW3. We will also consider the allocation of community infrastructure levy contributions towards provision of strategic waste management facilities located elsewhere in the borough.

20.33 For part 7 of the policy, developers should submit a plan for the management on-site waste to demonstrate how much construction, demolition and excavation waste will be reused and recycled, taking account of the London Plan target of 95%. The sustainable transportation of waste (by water and rail) will be assessed as part of Policy RW2, see Part 1(i).

20.34 All sites and areas of search listed under Policy RW1 are shown on the relevant policies maps for Tower Hamlets and the LLDC

London Plan policies:

- D13 Agent of Change
- SI7 Reducing waste and supporting the circular economy
- SI8 Waste capacity and net waste self-sufficiency
- SI9 Safeguarded waste sites

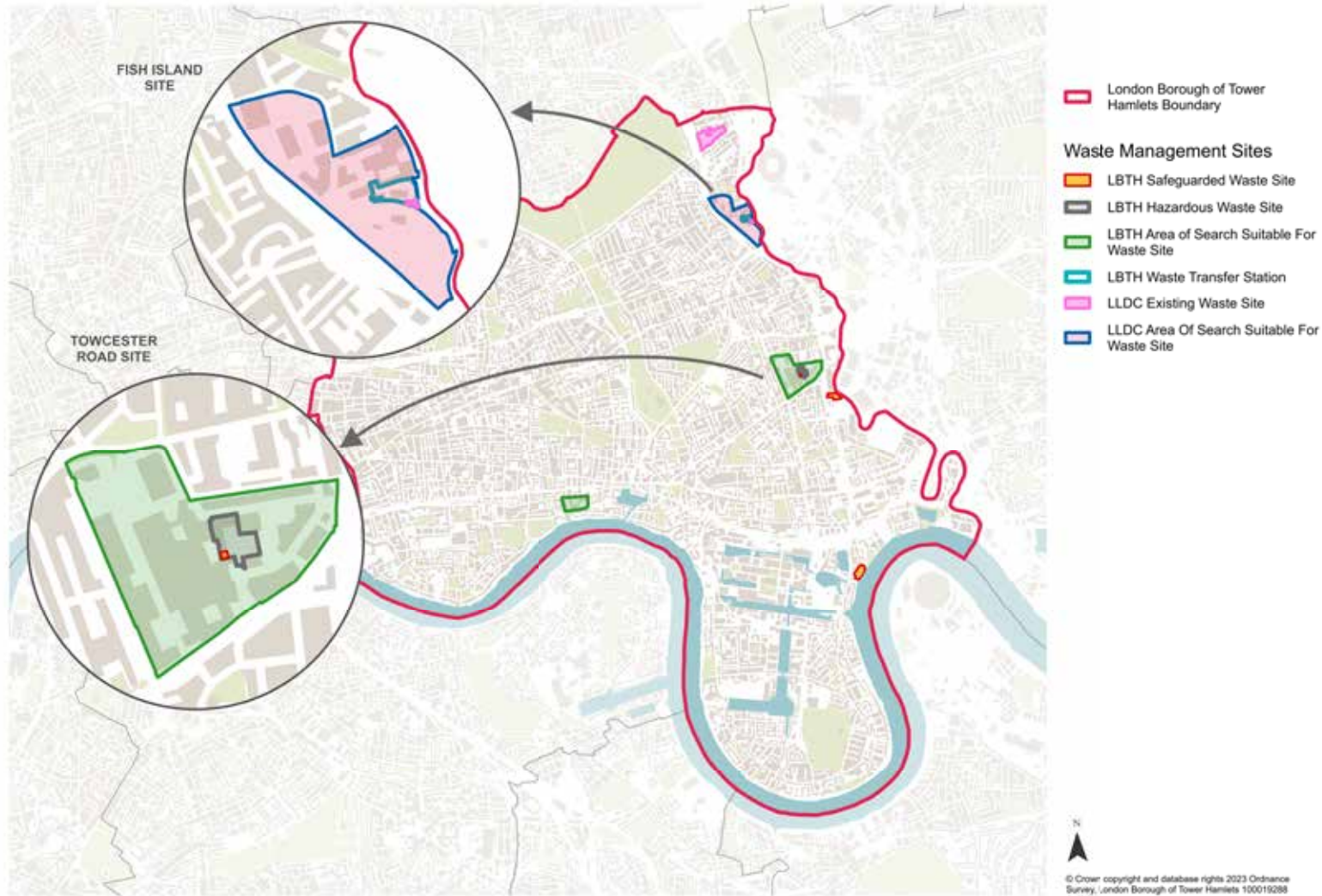
Local Plan policies:

- CG3 Low carbon energy and heating
- CG4 Embodied carbon, retrofit and the circular economy
- CG6 Managing flood risk
- CG7 Sustainable drainage
- CG9 Air Quality
- CG10 Noise and vibration

Evidence base:

- Tower Hamlets Waste Data Update 2024
- Tower Hamlets Waste Data Study, 2023
- Don't let our future go to waste, Waste Management Strategy, 2018-2030
- Reuse, Recycling and Waste SPD, 2020
- National Planning Policy for Waste, 2014

Figure 23: Waste sites map



Policy RW2 New and enhanced waste facilities

1. Development proposals to construct new waste facilities or replace or extend existing waste facilities will be supported where:

- a. they are located on safeguarded waste sites or existing waste sites or strategic industrial land or local industrial locations;
- b. they observe the 'Proximity Principle', dealing with waste as close to its source as possible;
- c. there is good access to the strategic transport network and where feasible, they prioritise rail and water transport over use of the principal road network;
- d. infrastructure to facilitate any road based vehicle fleet's transition to Zero and Ultra Low Emission Vehicles is provided on site;
- e. they demonstrate that the waste will be managed in accordance with the application of the Waste Hierarchy in priority order and its contribution to the circular economy and, where possible, seek to achieve a positive carbon outcome in accordance with the requirements of the London Plan (2021) Policy SI 8;
- f. they incorporate high-quality design, are of a scale and nature which integrates into its surroundings and ensures compatibility with adjacent existing and proposed land uses (including within neighbouring boroughs);
- g. they minimise amenity impacts on surrounding areas in terms of noise, odour, air quality and impacts on the transport network, according with Agent of Change principles;

- h. there is co-location with other compatible uses (including existing waste facilities or fleet depots);
- i. they propose technology which is appropriate for the location and nature of the site;
- j. there is adequate road capacity to accommodate any vehicle movements generated and that vehicles can enter, wait, unload and leave the site without prejudicing the safety of pedestrians and other road users;
- k. it provides effective on-site measures to ensure safety and security;
- l. it is enclosed, unless it can be demonstrated that environmental and amenity impacts, including the emission of air pollutants, noise, vibration, dust, glare, vermin, odours can be mitigated, both during and after operations; and
- m. it incorporates measures to minimise carbon emissions and maximise the use of lower-carbon energy sources.

2. Developments that propose waste management facilities should include an appropriately detailed plan for the site during construction, operation and decommissioning.

Supporting text

20.35 This policy relates to the provision of new and enhanced waste management facilities (including those replacing, expanding, or intensifying existing sites as well as capacity on exempt sites) and seeks to direct them towards the most appropriate and sustainable locations which maximise the efficient use of the land and do not have any unacceptable impacts.

20.36 The policy seeks to incorporate flexibility into the assessment of new waste management uses, recognising the evolving nature of both waste management practices and national and regional policies that may result in a need for retrofit or the delivery of new waste management facilities in the borough.

20.37 New waste management facilities will be directed towards existing safeguarded sites and areas of search (as set out in Policy RW1). In other locations, such facilities will still be expected to meet the criteria set out in Policy RW2 as well as any other relevant policies within the plan. Windfall proposals for waste management facilities outwith existing sites, safeguarded sites or areas of search will be required to demonstrate why it is not feasible to do so within the areas identified in RW1.

20.38 Part 1 seeks to ensure that new developments are located close to the sources of waste they are intended to manage, operate to support the application of the waste hierarchy and the move towards a circular economy. Development proposals should be supported by documentation which sets out how the development will meet these requirements. Part 1 (a) seeks to ensure the protection existing and safeguarded sites and also those with exemptions.



20.39 Part 1 (b) and 1 (d) set out details regarding management of waste in line with the proximity principle, within Tower Hamlets and surrounding boroughs; seeking to promote more sustainable operations at waste management facilities and the circular economy; and waste being a resource which can support future development within Tower Hamlets and London.

20.40 It should also be demonstrated how the operation of the facility either new or enhanced will minimise impact on surrounding existing uses and amenity.



20.41 Parts 1(c) and (j) seek to ensure applicants demonstrate that opportunities to transport both construction and operational waste from the site via rail and water are explored (including shared facilities at existing railheads, wharves, and depots) as a means to reduce congestion and vehicular movements on the road network. Information on sustainable transportation of waste should be submitted as part of the planning application, alongside details of reuse and recycling of waste arising during the construction phase in line with Policy RW1 (see part 7).

20.42 Developments providing additional waste management capacity will be encouraged to co-locate with existing waste facilities and other

compatible uses without having any significant detrimental impacts on the amenity and the function of the immediate and surrounding area to optimise the potential of sites and address the intensification of land uses, as per part 1(h).

20.43 The types of waste technology that will be suitable will depend on the nature and scale of the proposed scheme and the characteristics of the site and its surroundings, as required under part 1(i). Broad types of facility suitable for each area of search are set out in the schedule of areas in Policy RW1. These are likely to be small-scale facilities due to the constrained nature of the borough.

20.44 Part 1(l) seeks to mitigate adverse impacts associated with waste management facilities. Waste management facilities should be enclosed and covered on all vertical sides with small access and egress points, fitted with fast-acting doors, and incorporate an air filtering system to reduce airborne particulate concentrations in and outside of the building in line with Environment Agency advice. This provides an effective way of controlling dust and particulate pollution within waste developments. In cases where enclosure is not possible, proposals must provide details of proposed measures demonstrating how the control measures can adequately mitigate these impacts. Operators will be expected to obtain the appropriate environmental permits from the Environment Agency or the Local Authority and comply with the conditions of those permits at all times.

20.45 To minimise the impact on climate change, waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power, see Part 1(m), such as anaerobic digestion. In instances where this is not feasible, an energy statement must be submitted with the planning application demonstrating that it is not technically feasible or economically viable.

20.46 Part 2 seeks to offer applicants guidance on the content of management plans which are to be designed to ensure the operation of waste management facilities does not detrimentally impact on the amenity, environmental and infrastructure of the surrounding area during construction, operation and decommissioning. Management plans should include:

- ★ vehicle movements within the site, demonstrating there is adequate road capacity to accommodate any vehicle movements generated and that vehicles can enter, wait, unload and leave the site without prejudicing the safety of pedestrians and other road users;
- ★ how dust, mud or debris build up will be minimised on hard surfaces outside designated waste storage or processing areas;
- ★ site surfacing, ensuring the integrity of surfaces facilitates the safe and smooth movement of heavy goods vehicles around the site;
- ★ where and how waste is stored, how material drop heights will be minimised and stockpile height limited;
- ★ any water or odour neutralising misting system to prevent the escape of dust or odour from the site, and its maintenance;
- ★ wheel washing facilities to ensure vehicles do not track mud or debris around the site or onto the highway;
- ★ how vehicles will be sheeted and securely covered where carrying materials likely to generate dust or odour onto the public highway to and from the site;
- ★ how any build-up of dust, mud or debris will be monitored and reduced where it would inhibit the safe and efficient operation of the site; and
- ★ site maintenance and record keeping.

London Plan policies:

- D13 Agent of Change
- SI7 Reducing waste and supporting the circular economy
- SI8 Waste capacity and net waste self-sufficiency
- SI9 Safeguarded waste sites

Local Plan policies:

- DV5 Developer contributions
- CG4 Embodied carbon, retrofit and the circular economy
- CG6 Managing flood risk
- CG7 Sustainable drainage
- CG9 Air quality
- PS3 Securing design quality

Evidence base:

- Waste Data Study, 2023
- Waste Data and Waste Capacity Study Update 2024
- Don't let our future go to waste, Waste Management Strategy, 2018-2030
- Reuse, Recycling and Waste Supplementary Planning Document (SPD), adopted 2020

Policy RW3 Waste collection facilities in new development

1. All new development must include sufficient accessible space to separate and store dry recyclables, organics, residual and bulky waste for collection, both within individual units and for the building as a whole. Waste storage facilities within developments should be designed to avoid any adverse amenity impacts.
2. New major residential development proposals must incorporate high-quality on-site waste collection systems that do not include traditional methods of storage and collection and are compatible with waste collection methods set out in the Tower Hamlets Reuse, Recycling and Waste SPD. In instances where this is not practicable, supporting evidence must be submitted with the application to demonstrate this.
3. New residential, non-residential, and mixed-use development proposals should be accompanied by a Waste Management Plan that complies with the requirements of Tower Hamlet's Reuse, Recycling and Waste SPD.
4. Provision of waste storage and collection should be informed through early engagement with relevant London Borough of Tower Hamlet's service areas. Developments that propose provision of onsite waste management technologies should be discussed at an early stage of design with the London Borough of Tower Hamlet's waste management team.

Supporting text

20.47 Part 1 of this policy will help to ensure that waste is collected and managed in a sustainable manner in line with the principles of the Tower Hamlets' waste management hierarchy as set out in Figure 22. It is also intended to increase the amount of waste recycled and composted from all developments, and to improve waste collection systems in developments with communal waste facilities in particular. Tower Hamlets is working towards meeting the London Plan target of recycling 65% of municipal waste by 2030 and zero biodegradable waste to landfill by 2026. The volume of household waste that was reused, recycled, or composted in Tower Hamlets needs to increase to meet these targets and ensuring the required facilities are provided in new developments will help move towards and meet these targets.

20.48 This part also seeks to ensure that dry recyclables, organics, and residual waste will be segregated, and for residential developments bulked, at source within new developments to:

- a. minimise transport movements from waste collection operations;
- b. minimise the financial and operational burden on existing waste collection system;
- c. maximise efficient use of collection resources;
- d. encourage recycling behaviour by residents and reduce contamination of recyclables collected; and
- e. make a positive impact on the quality of the street scene.

20.49 Incorporating sufficient waste storage capacity within new developments should be done from the outset to avoid capacity shortfalls or poor quality service. Applicants will need to forecast how much organic, recyclable, and residual waste will be generated when

the development is occupied and demonstrate that sufficient space has been allocated to the storage and/or bulking of this waste in both individual units and for the development as a whole.

20.50 Tower Hamlets is seeking to move away from the traditional waste storage methods, such as standard wheeled bins, bagged collections, and Euro bin containers, towards central bulking systems particularly for residential developments that require communal waste collection facilities. Central bulking system rather than standard bins and communal Euro bins, offer more waste storage which can be stored before needing collection and more waste can be collected in a single round. As a general rule, all of the systems using bulk containers allow waste to be stored in a smaller footprint than standard communal Euro bins. The location of storage containers should be chosen to maximise operational convenience and minimise environmental, amenity and transport impacts.

20.51 Under part 2 of the policy, new major residential developments will be expected to incorporate on-site waste collection systems that are compatible with waste collection services. Such systems could include compactors, underground storage containers, vacuum systems, and automated waste collection systems. These systems require land to be set aside to store bulked waste materials, with the size and footprint varying from system to system. Preference should be given to systems that can provide for a weekly collection service as a minimum and allow separate collection of organic wastes or facilitate onsite processing of organics. Applicants should discuss options with the waste management team prior to the submission of an application. Food waste, household waste and recyclables must be separated to allow independent collection and onward management.



20.52 The Tower Hamlets Reuse, Recycling and Waste SPD sets out information on how waste management should be addressed in proposals for new residential (including mixed use) development. The SPD has been produced to support developers in submitting a planning application that meets the policy requirements of the Council. The principles set out in the SPD may also be applied to wholly commercial development and when existing development is refurbished. The Tower Hamlets Reuse, Recycling and Waste SPD sets out how the five stages of waste management and ten steps to occupation are to be followed to guide the most appropriate waste management system for new developments, and how to provide sufficient information in support

of a complete planning application. This SPD can be used to inform formulation of a waste management plan as required under part 3 of Policy RW3 – Waste collection facilities in new development.

20.53 In instances where it is not practicable or we consider it inappropriate for non-traditional waste collection systems to be incorporated within the development, the developer or managing agent must provide adequate space as well as collection containers that are in accordance with the requirements set out in the Tower Hamlets Reuse, Recycling and Waste SPD.

20.54 Planning applications should clearly set out the access route of the occupiers and the servicing vehicles, including a clear swept path in accordance with the Council's waste collection specifications, and access arrangements to container stores. The identified waste storage area must be designed to ensure refuse collection vehicles are able to enter and exit the highway in a forward gear and perform all collection activities within the curtilage of the development site. Applicants are advised to contact the waste management team that manages the collection of waste prior to submitting a planning application and adopt a collaborative approach to ensure these arrangements are in line with our waste collection services. Further advice is available in Tower Hamlets Reuse, Recycling and Waste SPD.

London plan policies:

- D6 Housing quality and standards

Local plan policies:

- HFg Housing standards and quality

Evidence base:

- Reuse, Recycling and Waste SPD, 2020



Site Allocations

21. Introduction

21.1 Delivering sustainable places is an important aspect of spatial planning to address the needs and priorities of Tower Hamlets, such as building a significant number of homes to reduce overcrowding, and delivering long term benefits to people and communities across the borough. Successful place-making is critical to creating cohesive, well-connected and more vibrant communities and ensuring that development responds positively to the distinct and unique characteristics which make Tower Hamlets a great place to live, work and visit.

21.2 Policy DV1 (Areas of growth and opportunity within Tower Hamlets) sets out the overall strategy of how growth will be delivered across the borough. This section provides more detail on how different areas of the borough will accommodate this growth.

21.3 In order to realise the vision and objectives of the Local Plan, the following sub-areas have been identified to positively manage development opportunities, particularly housing delivery, and change in the borough at the strategic level:

- City Fringe
- Central
- Leaside
- Isle of Dogs and South Poplar.

21.4 This section sets out how each sub-area will grow and change over the period to 2038. In particular, it sets out the vision, objectives and overarching principles which will inform and guide development proposals within each sub-area.

21.5 Within each sub-area, a number of sites (known as allocations) have been identified to accommodate new homes and jobs alongside necessary infrastructure, such as open space, community, health and education facilities.

21.6 All of the sub-areas and site allocations are shown in Figure 24. This section also contains figures illustrating each sub-area and the site allocations within them. These figures are illustrative and show how the principles and requirements set out in this section could be implemented.

21.7 The site allocations have been selected following an assessment of their suitability for development (that they would not lead to inappropriate development that would have negative impacts on current or future residents of the borough), their availability and deliverability (that there is believed a realistic prospect of the sites being developed during the plan period), and that they can deliver a strategic amount of housing to help the borough meet its housing targets over the plan period (generally, this has been assumed to be at least 500 homes, although in some instances sites are delivering other strategic functions as well, such as employment space or student housing).

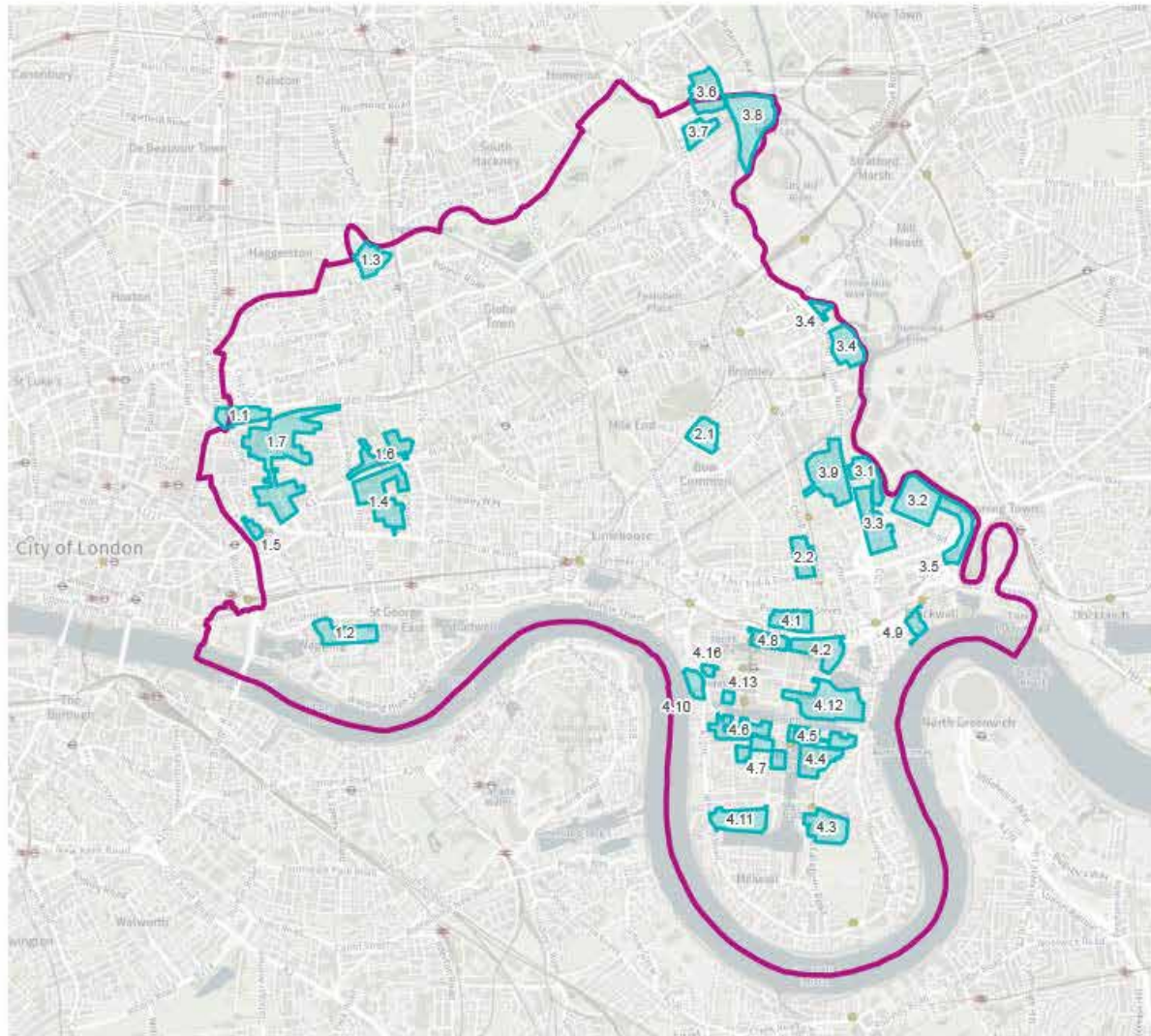
21.8 The site allocations have been further developed through a design-led site capacity assessment, as set out in the London Plan. This has involved looking at each site allocation in terms of what an appropriate layout, scale, mass, and height would be, and from there determining the capacity of housing and, where appropriate, other uses that could be included on site, taking into account the need to provide infrastructure on site allocations as well. These capacity assessments are intended to set out an appropriate form of development, but are not intended to be entirely prescriptive, and other forms of development may also prove to be acceptable where they meet the requirements of the site allocations, and do not exceed the appropriate heights set out in them.

21.9 Development within these sub-areas will also need to take account of other relevant guidance and supporting information such as London Plan Guidance (LPGs)/Supplementary Planning Documents (SPDs), masterplans and Opportunity Area Planning Frameworks (OAPFs).

21.10 When determining a planning application, flexibility may be applied to the policies relating to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme to ensure the site allocation is deliverable in the context of the principles of sustainable development.

21.11 Some of the site allocations are under multiple ownership and comprise a number of development plots. In such cases, effective engagement between residents, landowners, developers and leaseholders needs to take place in order to facilitate potential land assembly and comprehensive redevelopment.

Figure 24: Site allocations



-  London Borough of Tower Hamlets Boundary
-  Site Allocations
- 1.1 Bishopsgate Goods Yard
- 1.2 London Dock
- 1.3 Marian Place Gasworks and The Oval
- 1.4 Whitechapel South
- 1.5 London Met University
- 1.6 Whitechapel North
- 1.7 Brick Lane and Pedley Street
- 2.1 Bow Common Lane
- 2.2 Chrisp Street
- 3.1 Ailsa Street
- 3.2 Leven Road
- 3.3 Aberfeldy Estate
- 3.4 Bromley By Bow
- 3.5 Blackwall Trading Estate and Leamouth Road Depot
- 3.6 Hackney Wick Station
- 3.7 Hepscott Road
- 3.8 Sweetwater
- 3.9 Teviot Estate
- 4.1 Aspen Way
- 4.2 Billingsgate Market
- 4.3 Crossharbour
- 4.4 Limeharbour
- 4.5 Marsh Wall East
- 4.6 Marsh Wall West
- 4.7 Millharbour
- 4.8 North Quay
- 4.9 Reuters
- 4.10 Riverside South
- 4.11 Westferry Printworks
- 4.12 Wood Wharf
- 4.13 10 Bank Street
- 4.16 Westferry / Park Place

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22. City Fringe

Location

22.1 The City Fringe sub-area is located in the western part of the borough, bounded by the City of London to the west, the London borough of Hackney to the north, the River Thames to the south, and the borough's inner city communities to the east. The sub-area also corresponds with the borough's portion of the London Plan's City Fringe opportunity area. The wider opportunity area also includes parts of the London boroughs of Hackney and Islington.

22.2 The City Fringe represents a collection of vibrant and distinctive town centres and employment hubs, which sit alongside residential areas. It comprises eight distinct character places. The Tower Hamlets Urban Structure and Characterisation Study provides more information on the key elements of the local character of each of these places.

Vision for City Fringe

22.3 By 2038, the City Fringe will become a more attractive place to live, work and visit. New communities will be well integrated into the area, benefiting from the close proximity to existing and new employment, retail and leisure uses within the wider area.

22.4 The world-class economic hub of the City of London will expand and opportunities arising from the Tech City and Med City initiatives will be maximised. Whitechapel, Cambridge Heath, Shoreditch, Spitalfields and Aldgate will all have a more diverse mix of commercial, cultural, leisure, tourism and night-time activities. It will be a place for new affordable and flexible employment spaces benefiting from the

arrival of the Elizabeth line and improved accessibility to the local area. Whitechapel and the surrounding area will benefit from new state-of-the-art research and education facilities and will accommodate start-ups and other supporting businesses.

22.5 A new civic centre and a new green spine to the south of Whitechapel Road will provide focal points for leisure and community/social activities. The public realm in and around the Tower of London world heritage site will be enhanced, with improved legibility and movement for all users.

22.6 A masterplan will be developed for the Brick Lane area, which will set out a tailored vision, strategic priorities, and detailed design guidance for the development of sites within the Brick Lane area. This will be reflected in the site allocation for Brick Lane and Pedley Street.

Objectives

- a. Create a new civic centre and world-class life science research hub at Whitechapel
- b. Protect and enhance the area's heritage assets and improve the historic character of the individual places
- c. Support a mix of uses to support the financial and business centres of the City of London, Tech City and the emerging research and life sciences cluster (Med City), whilst striking the appropriate balance between residential and commercial development
- d. Improve and enhance legibility, permeability and connectivity within, to and from the area, whilst enhancing and improving green grid links
- e. Strengthen the role and function of the area's distinctive and varied

town centres to provide a choice of cultural, leisure and retail activities, and

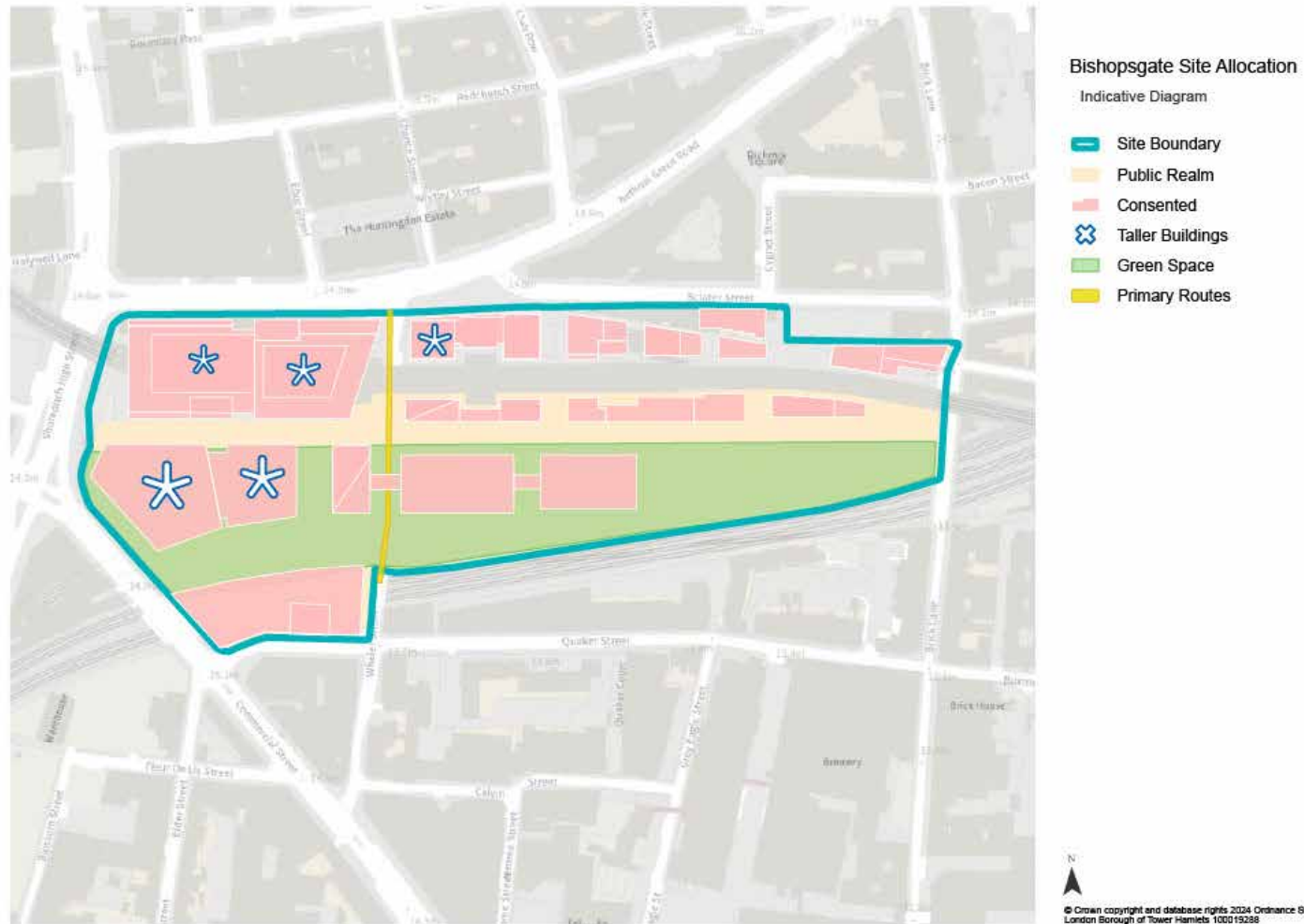
- f. Create new open spaces (including pocket parks and strategic open space) and improve links to existing publicly accessible open space.

Site Allocations in the City Fringe sub-area

- 1.1 Bishopsgate Goods Yard
- 1.2 London Dock
- 1.3 Parian Place Gasworks and The Oval
- 1.4 Whitechapel South
- 1.5 London Metropolitan University
- 1.6 Whitechapel North
- 1.7 Brick Lane and Pedley Street

1.1 Bishopsgate Goods Yard

Figure 25: 1.1 Bishopsgate Goods Yard (indicative)



Site information	Details
Address	Shoreditch High Street
Area [ha]	4.35
Ward	Weavers
PTAL [2031]	6a-6b
Planning designations Page 418	<ul style="list-style-type: none"> ● Area of substandard air quality ● London View Management Framework (views 8A.1 – Westminster Pier to St Paul's Cathedral, and 9A.1 – King Henry VIII's Mound to St Paul's Cathedral) ● Central Activities Zone ● Archaeological Priority Area (Spitalfields and Brick Lane, tier 2) ● Conservation Area (Fournier Street, adjacent to site) ● Statutory Listed Buildings (Braithwaite Viaduct, Grade II; Street Name Plaque Attached to Number 125 Brick Lane, Grade II, adjacent to the site; 2-38 Cheshire Street, Grade II, adjacent to the site)
Relevant Permissions	PA/14/02011 – outline permission for comprehensive mixed-use redevelopment including residential, business, commercial, and community uses. Included detailed permission for the tallest building and the retail arches.

Site proposal	Details
Indicative capacities	Within the Tower Hamlets portion of the site: <ul style="list-style-type: none"> ● 500 homes ● 11,500sqm non-residential uses - maximum
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development within the Tower Hamlets portion of the site should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the provision of a leisure facility and an Idea Store.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community and cultural uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community facility
 - Strategic consolidated open space of minimum 1 hectare
- This is a cross-boundary site with the London Borough of Hackney. Development should coordinate consultation across planning authorities and address cross-boundary issues.
- The community facility should be delivered within or adjacent to the Brick Lane district centre.

Form, massing, and heritage

- Height strategy: Appropriate height of 105m at the tallest point within Tower Hamlets, which should be located at the western end of the Tower Hamlets portion of the site, around Shoreditch High Street Overground station, on the boundary with the London Borough of Hackney. Heights should step down towards the eastern end of the site. This allocation does not set heights within the part of the site that is within the London Borough of Hackney.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes the Fournier Street conservation area, the existing Grade II-listed Braithwaite viaduct, Oriel gate and the forecourt wall to the former goods station fronting Shoreditch High Street, and other identified heritage assets. Consideration must also be given to the impact on strategic and local views. Development should also protect or enhance heritage assets in the surrounding areas (including within the London Borough of Hackney). For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

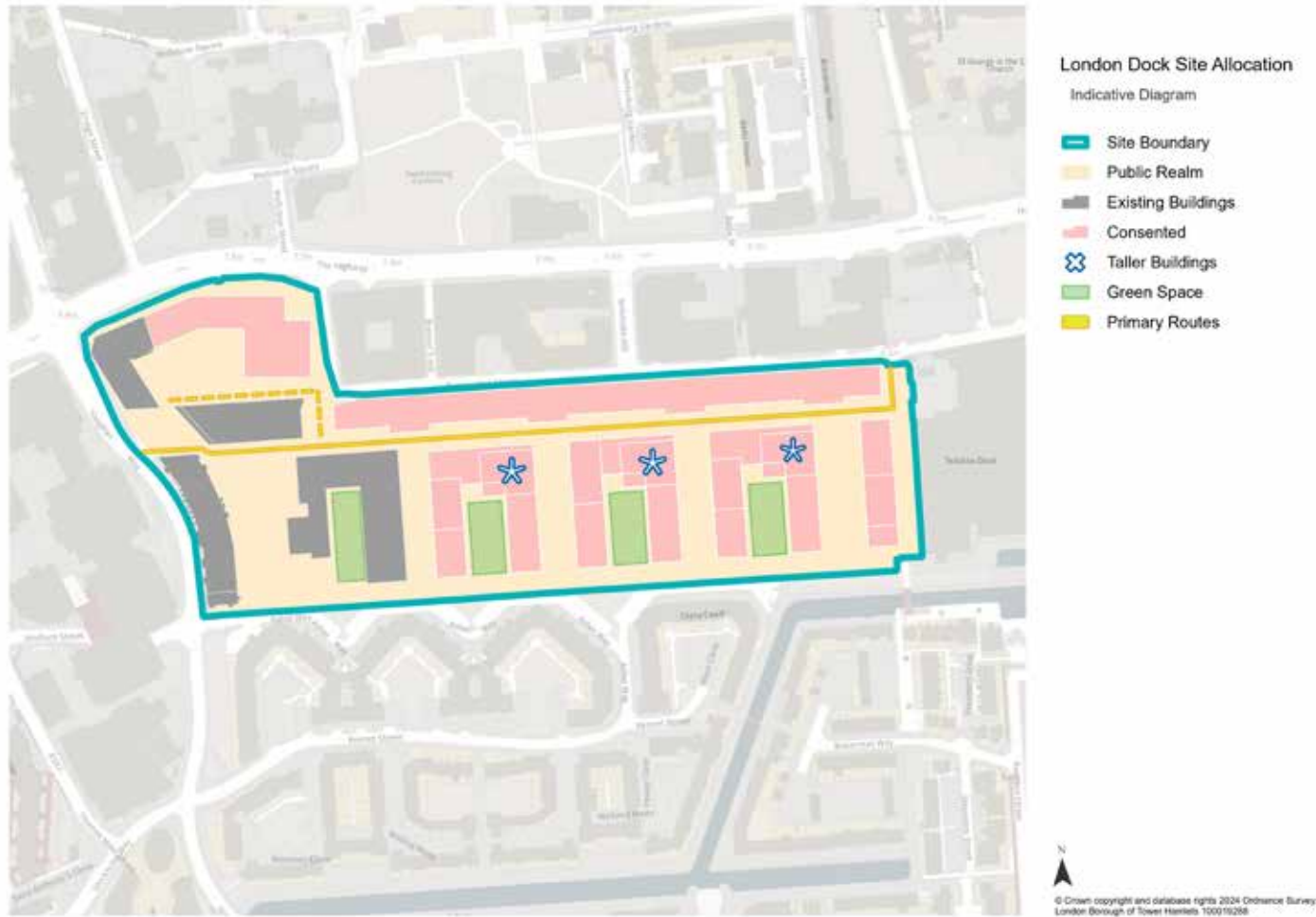
- Improve walking and cycling routes to, from and within the site to establish connections to Shoreditch High Street Overground station, Brick Lane District Centre, Shoreditch Triangle and the new open space. These should align with the existing urban grain to support permeability and legibility. Connections should be made to the green grid at Brick Lane and Quaker Street.

Environment and public realm

- Integrate development with the surrounding area and improve the street frontage and public realm on key routes, particularly along Wheler Street and ensure it is well integrated into the public squares to the east and south of the station.
- Provide a consolidated open space with a minimum size of one hectare, integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park located above the Braithwaite Viaduct.

1.2 London Dock

Figure 26: 1.2 London Dock (indicative)



Site information	Details
Address	Pennington Street
Area [ha]	5.78
Ward	St Katharine's and Wapping
PTAL [2031]	2-5
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area (small part of the site) ● Site of Importance for Nature Conservation (Shadwell Basin, Wapping Wood, and Wapping Canals, adjacent to the site) ● Tower Hamlets Activity Area ● Archaeological Priority Area (Wapping, tier 2) ● Neighbourhood Planning Area (Wapping) ● Statutory Listed Buildings (Pennington Street Warehouses and Vaults, Grade II; Tobacco Dock Warehouse, Grade I, adjacent to site)
Relevant Permissions	PA/13/01276 (and subsequent amendments) – outline permission for comprehensive mixed-use redevelopment including residential, business, commercial, and community uses (including a school). Included detailed permission for plots A, B, and C. PA/16/02851 – reserved matters for plot D. PA/19/00766 – reserved matters for Plot E, the secondary school. PA/19/01684 – reserved matters for plot F . PA/22/02666 – reserved matters for plot G.

Site proposal	Details
Indicative capacities	1,800 homes Up to 21,500sqm of non-residential floorspace
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the provision of a secondary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Secondary School

Form, massing, and heritage

- Height strategy: Appropriate height of 98m at the tallest point, which should be the extant plot C1 located to the west of the site. Heights should generally step down towards Tobacco Dock to the east of the site.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes the listed warehouses on site and the nearby grade I listed Tobacco Dock. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

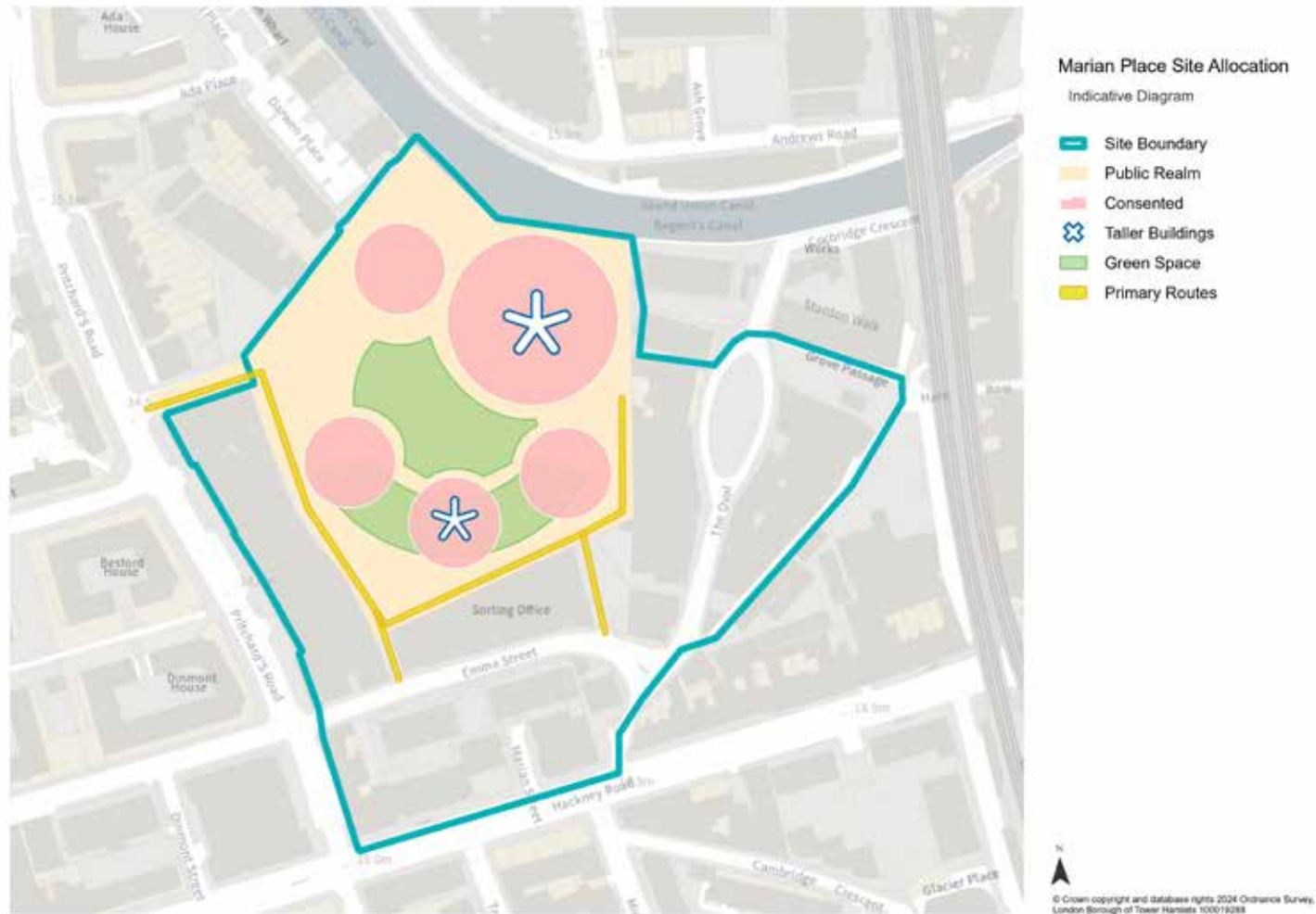
- Improve walking and cycling connections to, from and within the site. These should align with the existing urban grain to support permeability and access to Thomas More Neighbourhood Centre, St Katharine Docks, Tobacco Dock and the Wapping Canal, and to improve walking and cycling connections across The Highway. Safe access routes to the secondary school are required, and development will need to deliver improved pedestrian and cycling routes. Green grid improvements should be made along Vaughn Way, Pennington Street, and across the eastern edge of the site near Tobacco Dock, and should provide good quality onward connections to the green grid routes at Ensign Street, Artichoke Hill, and the ornamental canal, and to Swedenborg Gardens.

Environment and public realm

- Provide publicly accessible open space of at least 0.4 hectares in size, which should be easily accessible from across the site and connected to the green grid route.
- Improve the public realm at active site edges, particularly along The Highway and Vaughan Way where high levels of traffic can currently create an unwelcoming public realm.

1.3 Marian Place Gasworks and The Oval

Figure 27: 1.3 Marian Place Gasworks and The Oval (indicative)



Site information	Details
Address	Marian Place/The Oval/Emma Street
Area [ha]	4.38
Ward	Bethnal Green West
PTAL [2031]	4-6a
Planning designations Page 424	<ul style="list-style-type: none"> ● Area of substandard air quality (part of the site) ● London View Management Framework (view 8A.1 – Westminster Pier to St Paul’s Cathedral) ● Site of Importance for Nature Conservation (London’s Canals, adjacent to the site) ● Publicly Accessible Open Space (The Oval) ● Local Employment Location ● Conservation Area (Regents Canal, part of site; Hackney Road, part of site) ● Statutory Listed Buildings (2 Pritchards Road, Grade II; 444 Hackney Road, Grade II, adjacent to site; 446-450 Hackney Road, Grade II, adjacent to site)
Relevant Permissions	PA/19/02717 - Demolition of existing buildings, decontamination/remediation of the site and retention (including dismantling, refurbishment and reinstatement) of the two existing gasholder frames to facilitate redevelopment for a mixed-use development comprising 5 buildings ranging between 6-13 storeys to contain 555 residential dwellings and 4,182sqm non-residential floorspace in flexible A1-A4, B1 and D Use Classes.

Site proposal	Details
Indicative capacities	700 homes (550 on the gasholder site) 4,000sqm of new non-residential floorspace (minimum)
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses..
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses, including employment space for start-ups, SMEs, and creative industries (Class E)
 - Community uses (Class F1/F2)
- Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on-site decontamination requirements caused by the gas works. An assessment should be carried out to understand the potential contamination on site prior to any development taking place.
- The site is within the Cambridge Heath Local Employment Location, and should provide a range of office, light industrial, and studio workspaces suitable for start-ups, SMEs, and creative industry businesses.
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners,

developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Appropriate height of 57m at the tallest point, which should be located within the former gasworks site. Heights should step down around the former gasworks.
- Development should respond positively to the special character of the Regents Canal Conservation Area and its setting, the scale, height, massing and fine urban grain of the surrounding built environment, and integrate heritage assets on site through retaining, reusing and enhancing the existing heritage assets, including gasholders no.2 and no.5, the Victorian buildings adjacent to the Regents Canal, and the Georgian cottages, including the associated setted street and railings. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

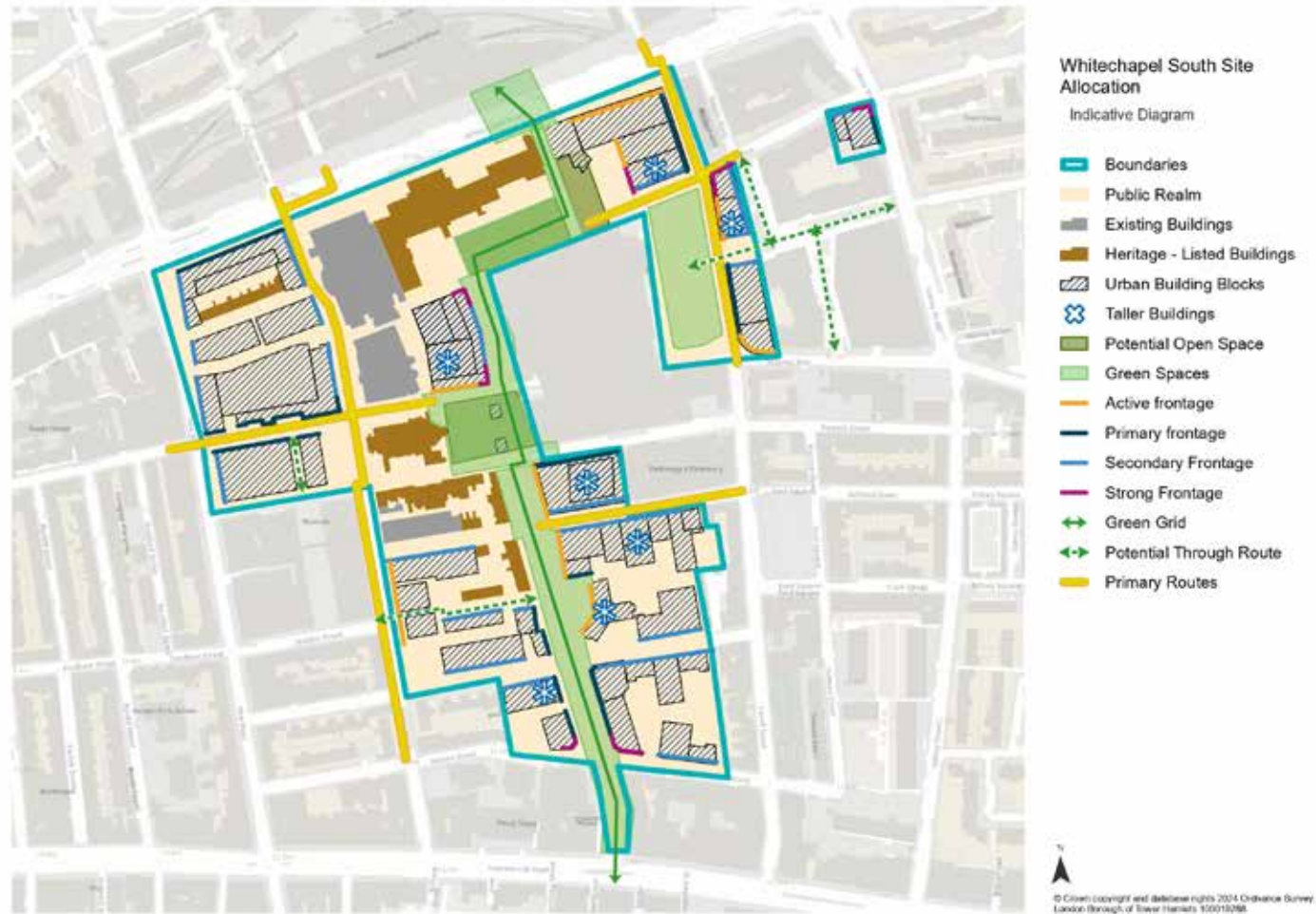
- Improve walking and cycling connections to, from and within the site. These should align with the existing urban grain to support permeability and link with Cambridge Heath Neighbourhood Centre. Development must provide public access along the waterfront at the Regents Canal, and provide good quality walking and cycling routes to the waterfront. Green grid improvements should be made along Emma Street, Hackney Road, Pritchard's Road, The Oval, and along the Regent's Canal, and provide good quality connections onwards to the green grid at Temple Street.

Environment and public realm

- Re-use The Oval as new public open space which positively contributes to the surrounding buildings and is well-connected to the new open space. The Oval should be fronted by a continuous building line following its footprint.
- All proposals for development within the site allocation should look to contribute to an overall provision of 1ha of new public open space across the allocation as a whole, delivered through a number of smaller open spaces and pocket parks.
- Provide active frontage at the waterside, set back from the canal; and positively frame the open space and The Oval to avoid excessive overshadowing.
- Improve the public realm with active site edges, particularly along Hackney Road, Pritchard's Road, Emma Street and The Oval. In addition, generous pavement and a linear landscaped square should be provided along Hackney Road, if this is made possible through redevelopment of the buildings that front it.

1.4 Whitechapel South

Figure 28: 1.4 Whitechapel South (indicative)



Site information	Details
Address	Whitechapel Road/Stepney Way/Varden Street
Area [ha]	9.99
Ward	Whitechapel
PTAL [2031]	6b
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Area of deficiency of access to nature ● Town Centre (Whitechapel District Centre) ● Local Employment Location ● Archaeological Priority Area (Mile End, tier 2) ● Conservation Area (London Hospital, part of site; Myrdle Street, part of site; Ford Square, part of site; Whitechapel Market, adjacent to site) ● Statutory listed buildings (Two K2 Telephone Kisoks, Grade II; The London Hospital, Grade II; 18-34 Mount Terrace, Grade II; Pillar Box in Rear Courtyard of London Hospital, Grade II; St Augustine with St Philip's Church, Grade II*; 26-42 Newark Street, Grade II; 43-69 Philpot Street, Grade II; 46-48 Ashfield Street, Grade II; 39-49 Walden Street, Grade II; 2-16 Walden Street, Grade II; 24-32 New Road and Attached Railings, Grade II; and numerous Grade II listed assets adjacent to the site)

Site information	Details
Relevant Permissions	<p>PA/15/02959 – Redevelopment to provide 12 buildings ranging from ground plus 2 – 23 storeys, comprising 343 residential dwellings, 168 specialist accommodation units, office floorspace, flexible office and non-residential institution floorspace, retail floorspace.</p> <p>PA/17/02825 – Partial demolition, including removal of the remaining west wing and the grocer's wing (behind retained façade), alteration and refurbishment of the former Royal London Hospital and erection of a part four-storey and part seven-storey extension (including partial basement) to provide a new Tower Hamlets Council Civic Centre.</p>

Site proposal	Details
Indicative capacities	<p>837 homes (65 on Royal Mail site, 772 on Whitechapel Estate site)</p> <p>425 student rooms (additional student housing on Floyer House site)</p> <p>93,000sqm non-residential floorspace (65,000sqm on NHS Life Sciences sites, 18,000 on Royal Mail site, 10,000sqm on Whitechapel Estate site)</p>
Phasing	2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace and community uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Student housing, only at Floyer House (sui generis)
 - Town centre uses, including employment space for life sciences only on the existing NHS sites in the west of site and a small amount on the Whitechapel Estate (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - NHS primary health care facility (including
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- The existing sexual health facility (including HIV services) will need to be re-provided on site in accordance with the prevailing sexual health facility building guidance (e.g. Health Building Note 12-01: Consulting, examination and treatment facilities. Supplement A: Sexual and reproductive health clinics) unless an alternative location can be found which meets the requirements of the relevant community facility policies. A continued service will need to be maintained to the satisfaction of the council's public health team.
- The site is within the Whitechapel Local Employment Location, and should provide a range of small office spaces to meet local needs. Life Sciences developments will only be acceptable on the NHS-

owned sites in the west of the site allocation, between New Road and Turner Street. A small amount of additional life sciences development may be acceptable on the Whitechapel Estate site, but only as part of developments that provide at least as much standard housing (use class C3) as the current permission on that site. Beyond this, development of workspace should focus on local needs.

- Student housing will only be acceptable on the existing student housing site at Floyer House – this will contribute towards the continuing functioning of the QMUL campus in this area.
- This site could potentially be suitable for accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Taller elements should be focused around the existing tall building at the Royal London Hospital. Appropriate heights of 68m on the Post Office site, 61m on Floyer House, 88m on the northern part of the Whitechapel Estate, and 64m on the southern part of the Whitechapel Estate. Heights should step down towards the west of the site.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes the setting of the London Hospital Conservation Area. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

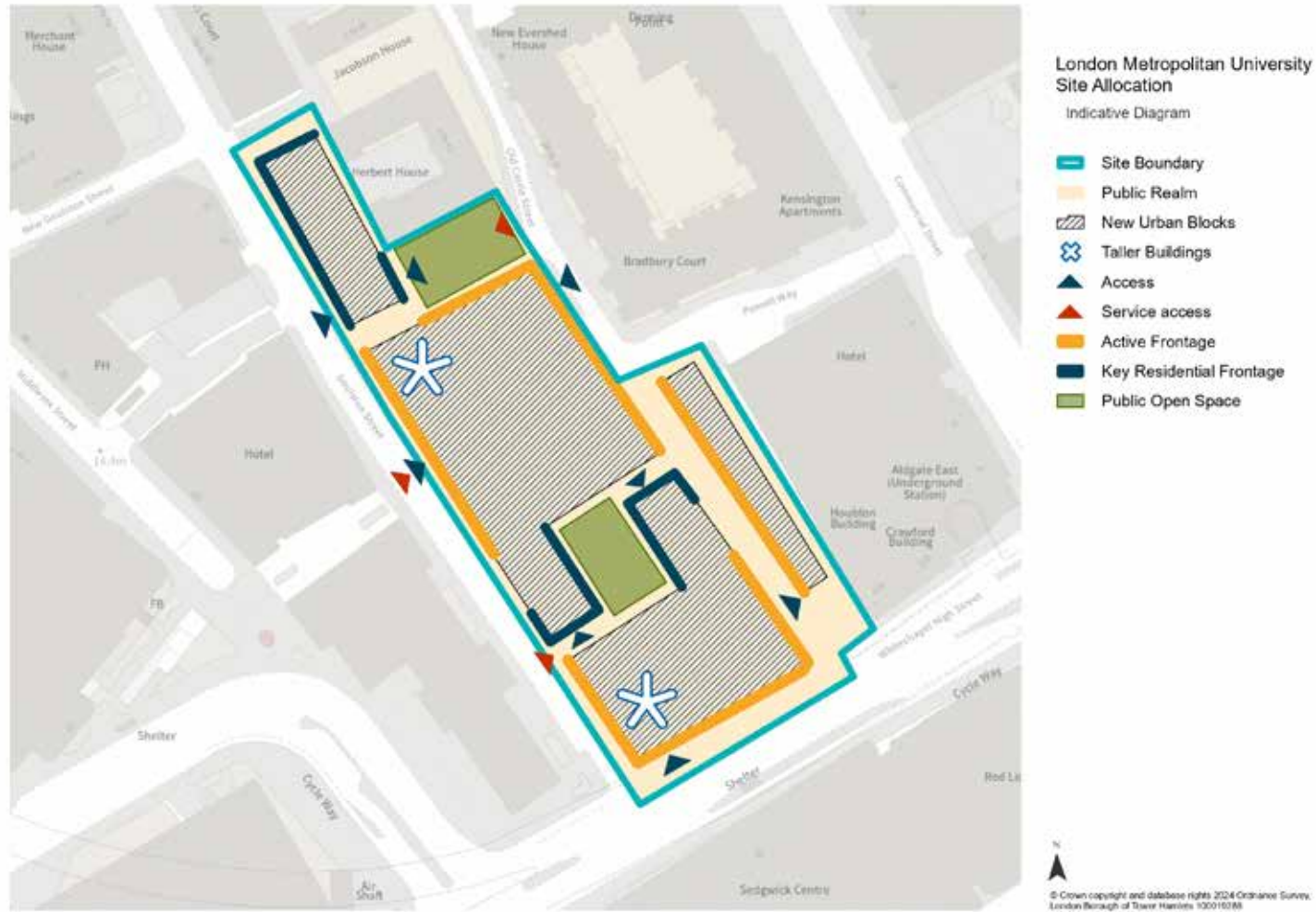
- Enhance connections to the Whitechapel North site allocation, and ensure the streetscape along Whitechapel High Street and adjoining streets is improved. Improvements to the green grid should be provided along Whitechapel High Street, Stepney Way, New Road, and Cavell Street, along with good quality connections to surrounding green grid routes. This is a large site, and connections need to be improved both north-south and east-west.

Environment and public realm

- Development should contribute to the delivery of a new and improved green open space (the Green Spine) stretching from Philpot Street to the new civic centre. It should be linear in nature and provide a direct visual link and improved north-south legibility across its length.
- Existing consented open space which has yet to be implemented on site is an integral element to the provision of one hectare of strategic open space and should be re-provided. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new Green Spine to maximise its multi-functional use.
- Create a sense of place set around a public square behind the former Royal London Hospital building and new public square immediately to the east of St Augustine with St Philip's Church to positively integrate the life sciences and research hub with the new civic centre and the green spine.

1.5 London Metropolitan University

Figure 29: 1.5 London Metropolitan University (indicative)



Site information	Details
Address	Goulston Street/Whitechapel High Street
Area [ha]	1.03
Ward	Spitalfields and Banglatown
PTAL [2031]	6b
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● London View Management Framework (view 25A.1 – The Queen’s Walk to Tower of London) ● Area of deficiency of access to nature ● Central Activities Zone ● Archaeological Priority Area (Aldgate and Portsoken, tier 2) ● Conservation Area (Wentworth Street, adjacent to site)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	520 student rooms 33,500sqm of educational floorspace
Phasing	2030-34

Land uses, activities, and delivery

- Development should consist of a redevelopment of the university buildings to provide additional teaching space and student accommodation.
- Acceptable land uses include:
 - Student housing (sui generis)
 - Residential (Class C3)
 - Educational space (Class F1)
 - Town centre uses along the High Street (Class E)
- The site is within the CAZ, and active frontages and town centre uses should predominate at ground level.

Form, massing, and heritage

- Height Strategy: Appropriate height of 63m at the tallest point, which should be located on the southwestern corner of the site, with an additional taller point of 56m further north. Heights should step down towards the existing residential buildings in the surrounding area.
- The impact of development on nearby conservation areas and on protected views should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes ensuring no negative impact on the backdrop of the view of the Tower of London. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

- Some of the existing buildings contribute positively to the character of the area, and adaptive re-use of these existing buildings should be explored. This includes the brick-faced buildings along Whitechapel High Street, the original Calcutta House building, the Annex to Calcutta House, and the locally listed wash houses towards the north of the site.

Routes and streets

- Improve walking and cycling connections to and from the site, ensuring high quality connections to the underground stations at Aldgate and Aldgate East. Improvements to the green grid should be delivered along Whitechapel High Street, and good quality connections should be provided to the green grid route to the north of the site at Wentworth Street.

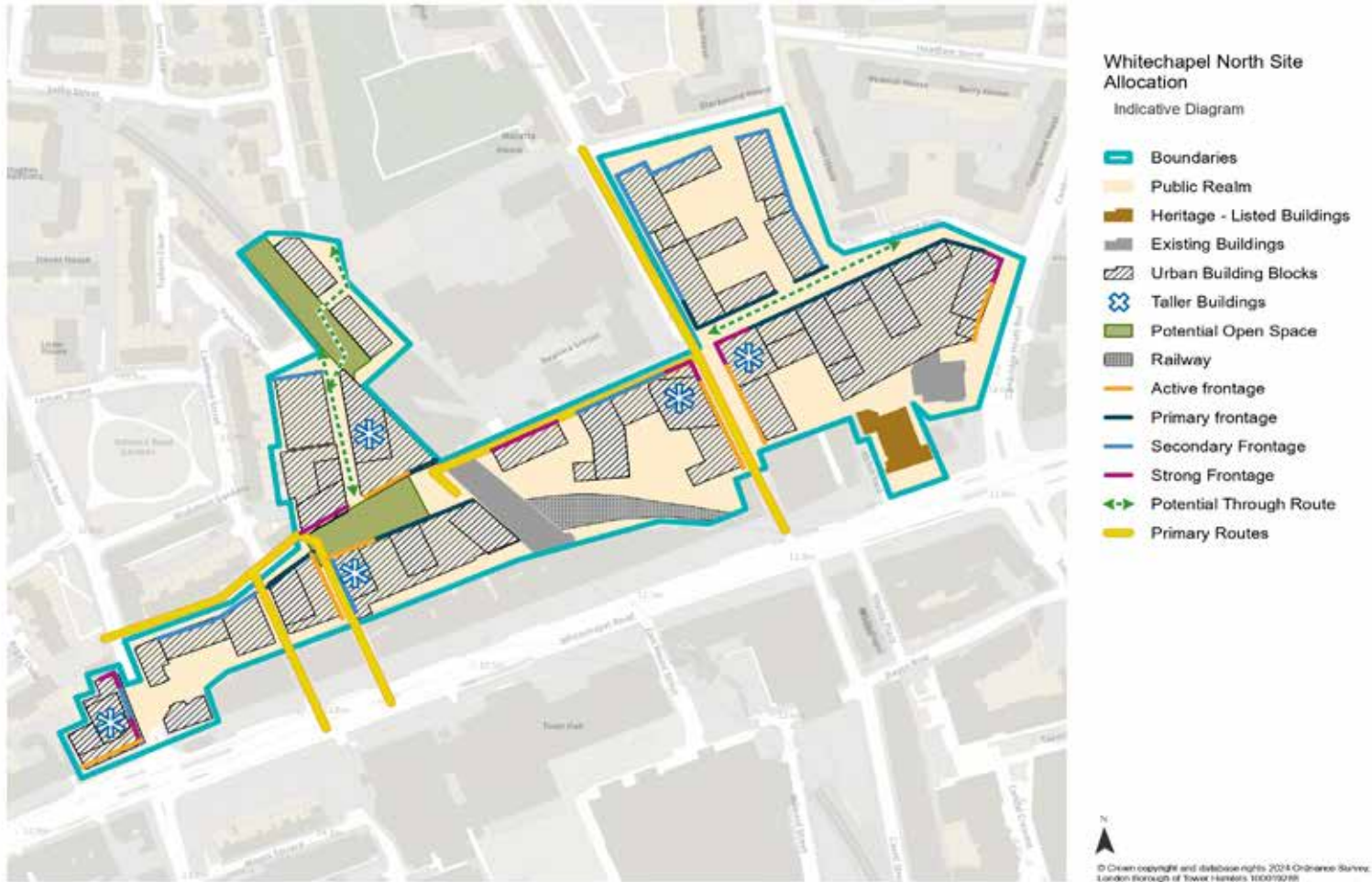
Environment and public realm

- Improved public realm and active frontages should be provided at principal entrances to key buildings, including along the Whitechapel High Street frontage, Goulston Street, and Old Castle Street.
- Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site should therefore aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm.

1.6 Whitechapel North

Figure 30: 1.6 Whitechapel North (indicative)

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Site information	Details
Address	Durward Street/Brady Street/Vallance Road
Area [ha]	5.37
Ward	Spitalfields and Banglatown
PTAL [2031]	6a-6b
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Town Centre (Whitechapel District Centre) ● Local Employment Location ● Archaeological Priority Area (Whitechapel, tier 2; and London to Colchester Roman Road, tier 2) ● Conservation Area (Whitechapel Market; London Hospital and Myrdle Street, both adjacent to site) ● Statutory Listed Buildings (261-267 Whitechapel Road, Grade II; K2 Telephone Kiosk, Grade II; Kind Edward VII Jewish Memorial Drinking Fountain, Grade II; Parish Boundary Marker, Grade II; Albion Brewery Entrance Block, Grade II, adjacent to site; and numerous other Grade II listed assets adjacent to the site)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	<p>1,225 homes (575 on Sainsbury's site, 200 on Kempton Court site, 200 on Whitechapel Station site, 160 on Sports Centre site, 90 on Vallance Road site)</p> <p>At least 4,500sqm retail space (primarily on Sainsbury's site)</p>
Phasing	2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace and community uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Re-provision and enhancement of NHS primary health care facility
 - Re-provision of leisure centre
 - Community facility
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners,

developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

- As part of the site allocation, the market facilities should be reprovided, with associated storage and waste facilities provided. The site could also potentially provide operational car parking for the market, to remove parking from Whitechapel Road.
- As part of the site allocation, the leisure centre should be reprovided with at least the same floorspace as the existing leisure centre, and with provision of a 3G artificial grass pitch.
- This site could potentially be suitable for accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Appropriate heights at the tallest points of 56m at the Sainsbury's site and 52m at the corner of Vallance Road and Whitechapel Road, with heights stepping down around these points.
- Development on the Vallance Road site should repair and incorporate the locally listed building to the north of the street corner.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Enhance connections to the Whitechapel South site allocation and ensure the streetscape along Whitechapel High Street and adjoining streets is improved. Improvements to the green grid should be delivered along Whitechapel High Street, Vallance Road, and Brady Street, along with good quality onward connections to surrounding green grid routes such as that along Old Montague Street. This is a large site, and connections need to be improved both north-south and east-west.
- Vehicle movements around the redeveloped supermarket should be carefully considered to minimise conflict between pedestrians, cyclists, and motorised vehicles.

Environment and public realm

- Parking for the re-provided supermarket should be provided in a way which minimises the negative impact on the public realm and on primary routes for pedestrians and cyclists. Similarly, the provision of market storage areas should be carefully considered to avoid large areas of dead frontage.

Site information	Details
Address	Brick Lane/Pedley Street
Area [ha]	20.56
Ward	Spitalfields and Banglatown
PTAL [2031]	3-6b

Site information	Details
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (part of the site) ● London View Management Framework (views 9A.1 – King Henry VIII's Mound to St Paul's Cathedral, and 25A.1 – The Queen's Walk to Tower of London) ● Site of Importance for Nature Conservation (Spitalfields City Farm and Allen Gardens) ● Publicly Accessible Open Space (Allen Gardens, Allen Gardens Play Area, and Spitalfields City Farm) ● Town Centre (Brick Lane District Centre) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Spitalfields) ● Archaeological Priority Area (Spitalfields and Brick Lane, tier 2) ● Conservation Area (Fournier Street) ● Statutory Listed Buildings (Director's House, Truman Brewery, Grade II*; Brewmaster's House, Truman Brewery, Grade II; Former Stables at Truman Brewery, Grade II; Engineer's House, Truman Brewery, Grade II; Vat House, Truman Brewery, Grade II; Black Eagle Brewery, Grade II; 35 Buxton Street, Grade II; and numerous Grade II listed assets adjacent to the site)

Site information	Details
Relevant Permissions	PA/20/00415 - Redevelopment to include erection of a part five storey office building with ground floor and first floor commercial units and two storey basement for provision of plant, servicing, storage and a gym.

Site proposal	Details
Indicative capacities	<p>800 homes (410 on Fleet Street Hill and Pedley Street sites 250 on Truman Brewery East and Banglatown Cash & Carry sites 95 on Grey Eagle Street sites 45 on Osborn Street site)</p> <p>Up to 33,000sqm of non-residential floorspace (17,500sqm on Fleet Street Hill and Pedley Street sites 5,000sqm on Truman Brewery East and Banglatown Cash & Carry sites 1,500sqm on Grey Eagle Street sites 5,500sqm on Hanbury Street site 3,500sqm on Osborn Street site)</p>
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace and community uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community facility
 - Improved crossings of the railway lines in the north of the site
 - Enhancements to public realm and Allen Gardens
- The site is in multiple ownership and consists of a number of fragmented sites with opportunities for redevelopment, and landowners and developers should work together with the council to implement a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- New employment spaces delivered on this site must include a majority of spaces that are suitable for small-scale local businesses that will serve the local community.

Form, massing, and heritage

- Height Strategy: Appropriate height of 70m at the tallest point, which should be located on the Pedley Street site, with heights stepping down to an appropriate height of 39m on the Fleet Street Hill site. Heights on the rest of the site should respect the prevailing context of the conservation area, with appropriate heights of 40m on the Truman Brewery, Cash & Carry, and Grey Eagle Street sites, and 32m on the Osborn Street site.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. In particular, the character of the Fournier Street Conservation Area should be preserved and, where possible, enhanced. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site, particularly to connect up Allen Gardens, the Truman Brewery estate, and Shoreditch High Street station. These connections should align with the existing urban grain to support permeability and provide easy access to the district centre. Improved green grid routes should be delivered along Brick Lane, Fournier Street, Buxton Street, Quaker Street, and Wentworth Street, with good quality onward connections to adjoining green grid routes towards Shoreditch High Street Station and the adjacent Bishopsgate Goods Yard site allocation, and along Whitechapel High Street.

- There are a number of large street blocks within the site that present barriers to permeability, such as the Grey Eagle Street car park and other parts of the Truman Brewery estate, and the railway lines in the north of the site, and development should look to improve north-south and east-west connections through these blocks where possible.
- Vehicle movement along narrow streets in this area should be carefully considered to minimise conflict between pedestrians, cyclists, and motorised vehicles.

Environment and public realm

- Development should capitalise on opportunities to provide new small public open spaces, including pocket parks.
- Improvements to the public realm in this area should include additional street lighting, wayfinding, and street furniture, to create a place in which people can dwell, meet friends, and eat food, rather than just a place to pass through. Street furniture should be carefully considered and well-placed to ensure it creates sociable places and does not simply add to street clutter on busy routes.
- Applicants should consider how new development can contribute to explaining and emphasising the historic and cultural importance of Brick Lane.

23. Central

Location

23.1 The Central sub-area sits in the heart of the borough, bounded by London Borough of Hackney to the north, the London Legacy Development Corporation and the Leaside sub-area to the east, the Isle of Dogs and South Poplar sub-area to the south, and the City Fringe sub-area to the west. The sub-area is not a designated opportunity area, but has the capacity to deliver new development.

23.2 The sub-area is a collection of vibrant and distinctive town centres, transport interchanges and residential areas. The sub-area comprises parts of nine distinct character places (see Figure 26). The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Vision

23.3 By 2038, the distinct character and identity of the Central sub-area will have been enhanced and strengthened. Growth will be focused around vibrant and revitalised town centres and neighbourhood parades, including Roman Road and Mile End town centres. New development will complement the well-established streetscape and character and the area's many heritage assets, and their settings will be preserved or enhanced through opportunities for new heritage-led development.

23.4 Access to and the quality of the area's green open spaces (including Victoria Park and Mile End Park) and network of waterspaces (including Regents Canal and Limehouse Cut) will be enhanced and

opportunities for new green links and open spaces will be maximised. New development will reduce the severance resulting from The Highway, Mile End Road and Commercial Road, the waterways and railway lines, and provide public realm improvements. Improved cycling and walking routes will increase local accessibility and access to strategic cycle routes and transport interchanges.

23.5 Employment in the area will remain primarily local and small-scale focused in town centres and transport hubs, including Bethnal Green, Mile End and Limehouse. Industrial locations along The Highway and Limehouse Cut will further complement existing employment opportunities and will accommodate an increasing number of flexible workspaces suited to new growth industries, including creative and digital industries.

23.6 Queen Mary University of London's role as a knowledge hub will be strengthened, with stronger connections to Mile End Neighbourhood Centre and its public transport interchange. The area will be home to a more diverse range of residential and student communities, with a particular focus on family housing which will benefit from access to varied open spaces.

Objectives

- a. Ensure the strategic north-south spine of Victoria Park and Mile End Park is protected and enhanced with walking and cycling links, whilst maximising opportunities to access the waterways for recreational use

- b. Support a mix of uses in town centres to facilitate community cohesion and strengthen their role, including employment, retail, civic, cultural and leisure uses
- c. Overcome the physical barriers of the road, rail and waterway network to increase connectivity within the area, improve permeability between transport nodes and town centres to strengthen interconnected places
- d. Encourage the regeneration of key historic buildings to preserve the area's diverse heritage assets and character
- e. Deliver a range of housing choice from student accommodation, family housing, infill development and intensification where it contributes to delivering mixed and balanced communities, and
- f. Support the expansion of Queen Mary University of London and associated uses, while ensuring good integration with surrounding areas.

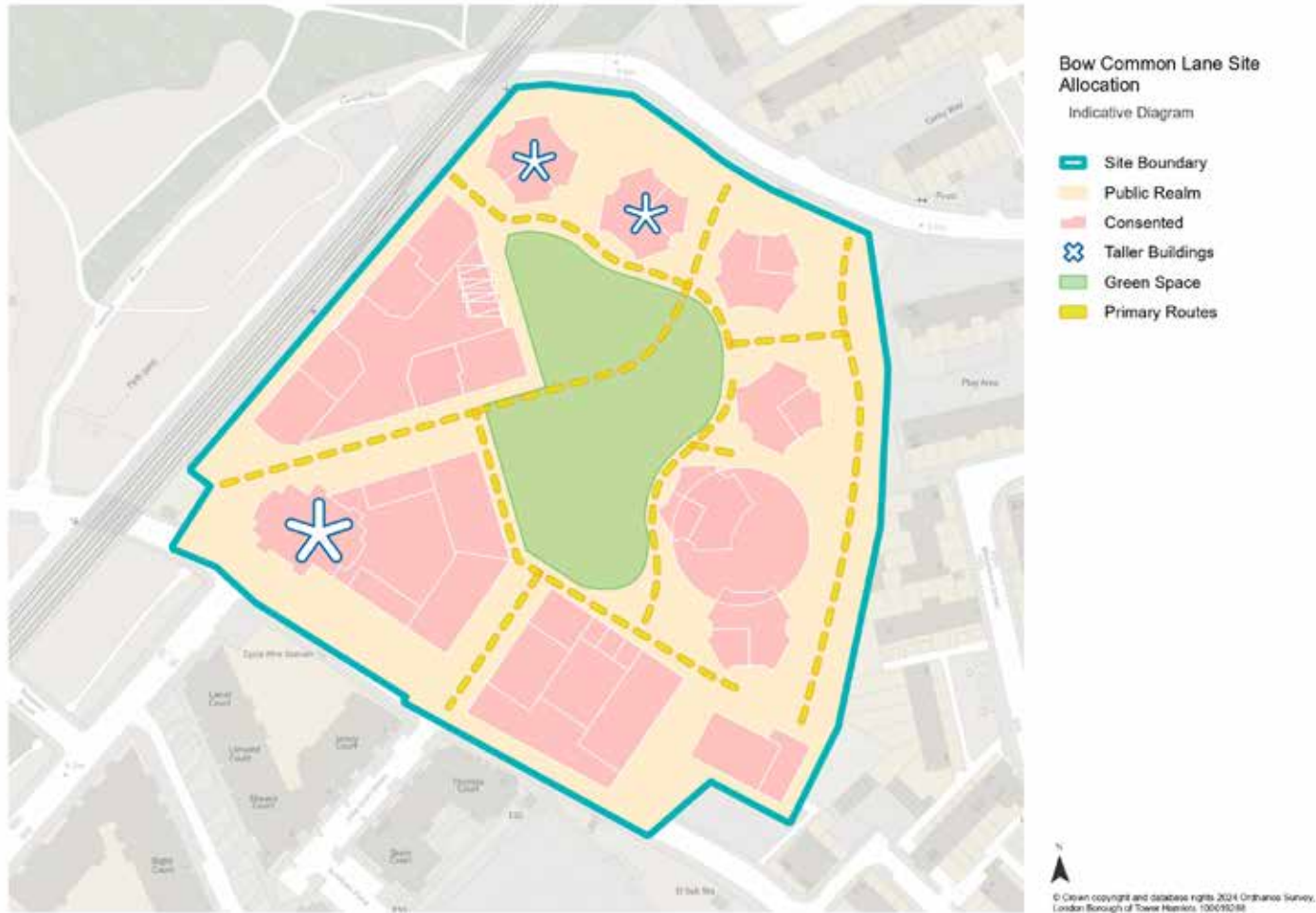
Site Allocations in the Central sub-area

2.1 Bow Common Lane

2.2 Chrisp Street

2.1 Bow Common Lane

Figure 32: 2.1 Bow Common Lane (indicative)



Site information	Details
Address	Bow Common Lane
Area [ha]	3.94
Ward	Bromley South
PTAL [2031]	2-3
Planning designations	<ul style="list-style-type: none"> ● Local Nature Reserve (Tower Hamlets Cemetery Park, adjacent to the site) ● Site of Importance for Nature Conservation (Tower Hamlets Cemetery Park and the Soane Centre, Old Railway at Fairfoot Road, part of Mile End Park SINC, all adjacent to the site) ● Metropolitan Open Land (Tower Hamlets Cemetery, adjacent to the site) ● Publicly Accessible Open Space (Bow Common Lane Gas Works) ● Conservation Area (Tower Hamlets Cemetery, adjacent to site)

Site information	Details
Relevant Permissions	<p>PA/19/02379 – outline permission for comprehensive mixed-use development for residential, business uses including office and flexible workspace, retail, financial and professional services, food and drink uses, community, education and cultural uses, a sixth form centre, assembly and leisure uses, public open space.</p> <p>PA/22/00905/S – approval of reserved matters for blocks A, B, and C, including the construction of residential units, flexible residential facilities, and commercial uses, together with new public open space.</p>

Site proposal	Details
Indicative capacities	1000 homes 2,500sqm retail/workspace/community/cultural uses
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and sixth form educational centre.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Sixth Form education facility
 - Strategic consolidated open space of minimum 1 hectare
- Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on site decontamination requirements caused by the gasworks. An assessment should be carried out to understand the potential contamination on site prior to any development taking place.

Form, massing, and heritage

- Height strategy: Appropriate height of 89m at the tallest point, which should be located towards the western side of the site. Heights should step down towards the existing residential buildings to the south and east of the site.
- Respond positively to the scale, height, and massing of the surrounding built environment, and to the nearby conservation areas at Swaton Road and Tower Hamlets Cemetery Park and nature reserve. The impact of development on the conservation areas should be considered, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting

place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and through the site, to address poor permeability created by the site. These should align with the existing urban grain to support legibility, particularly joining Knapp Road to Bow Common Lane, which should also see improvements to the green grid delivered. Good quality onward connections to the green grid routes along the railway arches and through the cemetery park should also be provided.
- Integrate the site with Tower Hamlets Cemetery Park through new or improved pedestrian and cycle routes.
- Ensure safe pedestrian and cycling access to the sixth form centre.

Environment and public realm

- Improve public realm with active site edges, particularly along Bow Common Lane.
- Provide active frontages along the railway to enhance the use and setting of the railway arches as a non-designated heritage asset.
- Implement noise screening measures/or a green buffer in areas bordering the railway line.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting should be investigated.

2.2 Crisp Street

Figure 33: 2.2 Crisp Street (indicative)



Site information	Details
Address	Chrisp Street
Area [ha]	3.92
Ward	Lansbury
PTAL [2031]	3-6a
Planning designations Page 446	<ul style="list-style-type: none"> ● Area of substandard air quality (part of the site) ● Flood risk area ● Area of deficiency of access to nature ● Publicly Accessible Open Space (Chrisp Street Market) ● Town Centre (Chrisp Street District Centre) ● Archaeological Priority Area (Lea Valley, tier 3 – small part of site) ● Conservation Area (Lansbury) ● Statutory Listed Buildings (Chrisp Street Market Clock Tower, Grade II; Festival Inn, Grade II; Susan Lawrence and Elizabeth Lansbury School, Grade II, adjacent to site)

Site information	Details
Relevant Permissions	PA/16/01612 - Comprehensive redevelopment of the site with 19 new buildings ranging from 3 to 25 storeys providing 643 residential units, market enhancement, refurbishment of retained Festival of Britain buildings, reconfiguration and replacement of existing and provision of new commercial uses including new cinema, alterations and additions to existing Idea Store, flexible affordable workspace/ community space, office space, retail, financial and professional services and café/restaurant floor space, public house, hot food takeaway; upgrade and provision of new public open space including child play space.

Site proposal	Details
Indicative capacities	650 homes 20,000sqm of town centre and community uses
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use scheme combining residential uses with an enhanced town centre combining retail, workspace, community and cultural uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Leisure uses, such as a cinema (Sui generis)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Idea Store re-provision
 - Youth centre re-provision
- Development should deliver a regenerated town centre for Poplar with a range of unit sizes, (including those suitable for independent and small local retailers), a market square and a re-provided Idea Store located on East India Dock Road.
- As part of the site allocation, the market facilities should be re-provided, with associated storage and waste facilities provided.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Appropriate height of 88m at the tallest point, which should be located at the southeast corner of the site. Additional taller point located in the section east of Chrisp Street at an appropriate height of 53m. Heights to step down towards the west and north of the site.
- The impact of development on nearby heritage assets and

conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes the Festival Inn, Clocktower and Poplar Baths and the Lansbury Conservation Area. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site – particularly to Langdon Park, Bartlett Park, Jollys Green, and All Saints DLR station. These should align with the existing urban form and grain to support east-west connectivity and wider permeability. An improved green grid connection should be provided through the centre of the site, with good quality onward connections to green grid routes at Cordelia Street and East India Dock Road.
- Development should ensure sufficient and well-integrated access arrangements for highways and servicing to the district centre and market, and should minimise conflict between pedestrians, cyclists, and motorised vehicles.

Environment and public realm

- Improve the public realm with active site edges, particularly along East India Dock Road and within the district centre.
- The provision of market storage areas should be carefully considered to avoid large areas of dead frontage.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting should be investigated.

24. Leaside

Location

24.1 The Leaside sub-area is located on the eastern side of the borough and forms part of the former London Plan's Lower Lea Valley opportunity area which stretches north comprising the boroughs of Newham and Hackney.

24.2 The London Legacy Development Corporation lies to the east of this area, and is the planning authority for the Fish Island and Bromley by-Bow character places within the borough, as well as Queen Elizabeth Olympic Park and surrounding areas.

24.3 The sub-area is a collection of vibrant and distinctive town centres, transport interchanges and residential areas. The sub-area comprises six distinct character places. The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Vision

24.4 By 2038, the Leaside sub-area will experience comprehensive regeneration and redevelopment of former and underused industrial areas. Connectivity will be transformed with a series of new bridges and riverside walkways across the River Lea, crossings along the A12 and A13, and enhancements to the safety and connectivity of pedestrian and cycle routes through and around industrial areas including Bow Goods Yard, which will integrate existing and new communities in the area.

24.5 The development of the Lea River Park (including the Leaway) will provide a new strategic publicly accessible green space and a series

of new pedestrian and cycling routes, linking the River Lea to London's wider green grid network, including the Lee Valley Regional Park.

24.6 Development in the area will have sufficient transport and social infrastructure to facilitate the creation of thriving mixed communities alongside vibrant neighbourhood centres. Housing provision will be accelerated through the Poplar Riverside Housing Zone and delivered alongside new local employment, enterprise and business opportunities.

Objectives

- a. Improve strategic connections to overcome the physical barriers to movement created by the A12, A13 and the waterways
- b. Deliver the Lea River Park (including the Leaway) to provide a network of interconnected water and open spaces, green walking and cycling routes and improve access to and along the River Lea
- c. Improve local connections by creating a street pattern that increases permeability for ease of pedestrian and cyclist movement
- d. Support existing and new neighbourhood centres by improving accessibility to them to ensure they act as the civic heart of surrounding communities
- e. Contribute towards the delivery of new affordable homes and community facilities through Poplar Riverside Housing Zone regeneration
- f. Optimise former industrial/employment land and protect designated industrial areas whilst sensitively integrating industrial activities into their site context and enhancing the public realm and pedestrian and cycle connectivity.

Site allocations in the Leaside sub-area

3.1 Ailsa Street

3.2 Leven Road

3.3 Aberfeldy Estate

3.4 Bromley by Bow

3.5 Blackwall Trading Estate and Leamouth Road Depot

3.6 Hackney Wick Station

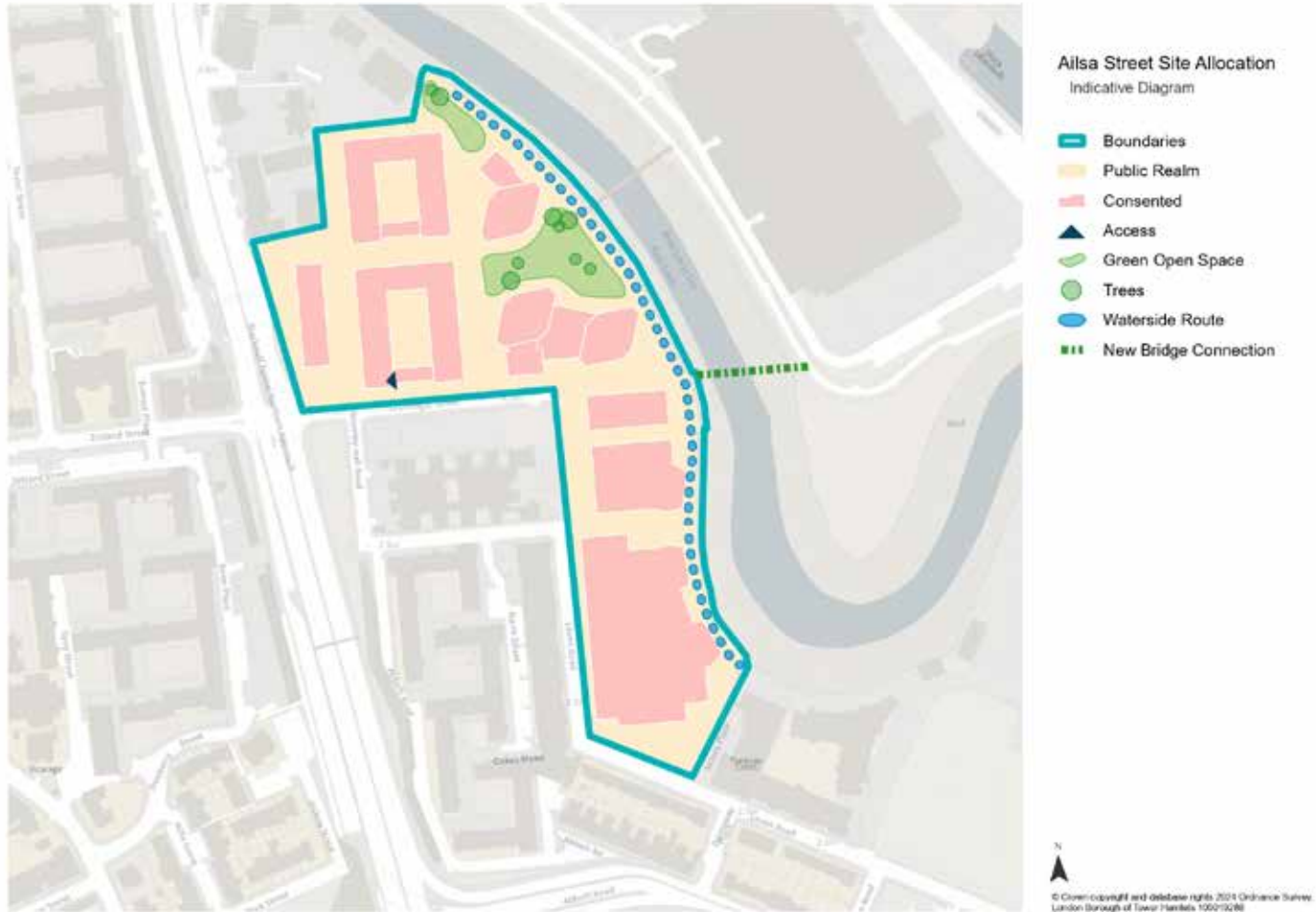
3.7 Hepscott Road

3.8 Sweetwater

3.9 Teviot Estate

3.1 Ailsa Street

Figure 34: 3.1 Ailsa Street (indicative)



Site information	Details
Address	Ailsa Street/Lochnagar Street
Area [ha]	3.90
Ward	Lansbury
PTAL [2031]	1a-3
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (River Thames and Tidal Tributaries, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Safeguarded Waste Site ● Conservation Area (Limehouse Cut, adjacent to the site) ● Statutory listed buildings (Bromley Hall, Grade II*; Poplar Public Library, Grade II; Former Fire Station, grade II, adjacent to the site; Former Bromley Hall School, grade II, adjacent to the site)

Site information	Details
Relevant Permissions	<p>PA/16/02692 – Ailsa Wharf, Ailsa Street - Demolition of existing structures/buildings and the redevelopment of the site for a mixed use scheme providing 785 residential units and 2,954 sqm GIA commercial floorspace within a series of thirteen building blocks varying between 3 and 17 storeys (Maximum height of 59.9m).</p> <p>PA/19/01760 – Islay Wharf, Lochnagar Street - Demolition of existing warehouse building and redevelopment of the site for mixed use development comprising two blocks ranging in height between 12 storeys and 21 storeys, accommodating 351sqm of flexible uses classes, and residential accommodation on the upper floors providing 133 residential units.</p> <p>PA/19/02148 – Former Poplar Bus Depot, Leven Road – Part retention and part demolition of the existing boundary walls and the former tram shed depot arches, and retention of the three storey office building. Demolition of the remainder of the existing warehouse and the redevelopment of the site to provide 530 residential units, 2644sqm of workspace, 508sqm of flexible retail; professional services; and restaurant/bar uses, within buildings ranging from 3 storeys (20.2m) to 20 storeys (72.7m).</p>

Site proposal	Details
Land uses	Small open space, bridge
Indicative capacities	1,450 homes (785 on Ailsa Wharf, 133 on Islay Wharf, 530 on former bus depot) 6,500sqm commercial floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Safeguarded bridge landing space for new crossing of the River Lea
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- Development should facilitate a new or extended bus route through the site to enhance access to public transport.
- Access to public transport and delivery of a walking and cycling bridge across the River Lea will need to be improved in line with

the phasing of development and in coordination with the London Borough of Newham.

- Development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.

Form, massing, and heritage

- Height strategy: Appropriate height of 80m at the tallest point, which should be located to the south of Lochnagar Street. Heights should step down away from this point, and particularly towards to A12 in the west of the site.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site - particularly to and along the River Lea to Bromley-by-Bow District Centre, Aberfeldy Neighbourhood Centre and to Langdon Park DLR station. These should align with the existing urban grain to support permeability and legibility. Provide an active and well-defined street frontage along Lochnagar Street, and create a stronger east-west link between the River Lea and the Langdon Park DLR station.
- Development must provide public access along the waterfront at the River Lea. Improved green grid routes should be delivered along the River Lea waterfront and along Lochnagar Street, with good quality onward connections to the adjoining green grid route at Zetland Street and the Teviot Estate site allocation.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- Improve the quality of and create a positive sense of place in the form of an active square at the corner of the A12 and Lochnagar Street.
- Development should step back from the River Lea to avoid excessive overshadowing and provide active frontage on the riverside.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater recycling should be investigated.

3.2 Leven Road

Figure 35: 3.2 Leven Road (indicative)



Site information	Details
Address	Leven Road
Area [ha]	8.06
Ward	Lansbury
PTAL [2031]	1a-2
Planning designations	<ul style="list-style-type: none"> ● Flood risk area ● Site of Importance for Nature Conservation (River Thames and Tidal Tributaries, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3)

Site information	Details
Relevant Permissions	<p>PA/18/02803 – Poplar Gas Holder Site - A hybrid planning application (part outline/part full) comprising:</p> <p>1.) In Outline, a comprehensive mixed-use development comprising a maximum of 195,000 sqm of floorspace for Residential; Business uses including office and flexible workspace; Retail, financial and professional services, food and drink uses; Community, education and cultural uses; A secondary school; Assembly and leisure uses; Public open space including riverside park and riverside walk.</p> <p>2.) In Full, for 66,600 sqm of residential arranged in four blocks, ranging from 4, 5, 6, 8, 9, 12 and 14 (57.6m) storeys in height, up to 2700 sqm of office and flexible workspaces, up to 500 sqm community and up to 2000 sqm leisure uses, up to 2500 sqm of retail and food and drink uses.</p>

Site proposal	Details
Indicative capacities	<p>2,800 homes</p> <p>8,500sqm commercial floorspace</p>
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses, and provision of a secondary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Secondary school
 - Strategic consolidated open space of minimum 1 hectare
 - Safeguarded bridge landing space for new crossings of the River Lea
- Ensure the open space is designed and usable for sport and recreation and located adjacent to the River Lea, featuring the Leaway and water spaces. It should meet the minimum size of one hectare.
- Development should facilitate a new or extended bus route to serve the site to enhance access to public transport.
- Access to public transport and pedestrian and cycle connectivity across the River Lea will need to be improved in line with the phasing of development and in coordination with London Borough of Newham.
- Open space should be delivered in the earliest phase of development.
- Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on site decontamination requirements caused by the gas works. An

assessment should be carried out to understand the potential contamination on site prior to any development taking place.

- Prior to demolition, the gasholders on the site did not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme.
- Development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.

Form, massing, and heritage

- Height Strategy: Appropriate height of 76m at the tallest point, which should be located in the northern part of the site, near the river and the new park. Heights to step down from this point towards the existing lower-rise residential context to the south and east.
- Development should retain and reuse parts of the dismantled gas holder no. 1 within the future development, and reflect the industrial heritage of the site through measures such as, but not limited to, public art, landscaping and building design.

Routes and streets

- Improve walking and cycling connections to, from within the site - particularly to link with the River Lea Park walk, Aberfeldy Neighbourhood Centre to Langdon Park DLR station and East India DLR station. Provide safe pedestrian and cycling access to the secondary school. Development must provide public access along the waterfront at the River Lea. Improvements to green grid routes should be delivered through the site and along the River Lea waterfront, with good onward connections provided to green grid routes at Oban Street and Abbott Road, and to the Aberfeldy Estate and Blackwall Trading Estate site allocations.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- Development should step back from the River Lea to avoid excessive overshadowing and enable activation of the riverside.
- Improve the public realm with active site edges, particularly along Leven Road.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater recycling should be investigated.

3.3 Aberfeldy Estate

Figure 36: 3.3 Aberfeldy Estate (indicative)



Site information	Details
Address	Abbott Road/Dee Street
Area [ha]	7.24
Ward	Lansbury
PTAL [2031]	1b-3
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Publicly Accessible Open Space (Aberfeldy Playground; Aberfeldy Millennium Green, Leven Road Park, Braithewaite Park – all adjacent to the site) ● Town centre (Aberfeldy Street neighbourhood centre) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Balfron Tower, adjacent to the site) ● Statutory listed buildings (Former Bromley Hall School, grade II; adjacent to the site)
Relevant Permissions	PA/11/02716 - Outline planning application for the mixed-use redevelopment of the existing Aberfeldy estate comprising: Creation of 1,176 residential units in 15 new blocks between 2 and 10 storeys in height plus 1,743sqm retail space, professional services, food and drink and 1,786 community and cultural uses.

Site proposal	Details
Indicative capacities	1,550 homes 3,500sqm commercial/town centre floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses, and provision of a primary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school expansion (with re-provision of any playing fields, MUGAs, or sports facilities)
 - Community facility (re-provision)
 - Strategic consolidated open space of minimum 1 hectare
- Delivery should be phased so that a revitalised Aberfeldy neighbourhood centre is delivered within the first phase of the programme, to avoid uncertainty for retailers over the status of the centre and to ensure the new centre is embedded in the community as increasing numbers of new residents come to live in the surrounding area. Within the town centre, active frontages and town centre uses should predominate at ground level.
- The site may be appropriate for some small-scale employment uses on the A12 frontage to help manage the hostile roadside environment in terms of noise and air quality for new and existing residents.

- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Appropriate height of 80m at the tallest point, which should be located at the northern end of Abbott Road. Heights should step down from this point towards the lower-rise residential context in the east and south of the site, and towards Bromley Hall School to the north of the site.
- A strong built frontage should address the A12 along the site's western boundary. The scale of development along the A12 edge should vary, to avoid a feeling that the estate is presenting a 'wall' to the road and turning inwards. Given the busy nature of this principal urban road, building frontages should step away from the route. This may permit some mitigation measures along the route to be introduced to help delivery better air quality and help manage noise pollution issues.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes ensuring that development does not dominate the listed Bromley Hall School or undermine the setting of, and views towards, Balfron Tower. The prominence of Balfron Tower should be preserved from borough-designated viewpoints. Any tall buildings in these

views must be subservient to Balfron Tower and be located so that they do not disrupt the silhouette of the building on the skyline. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals, and the Tower Hamlets Views and Landmarks Study.

Routes and streets

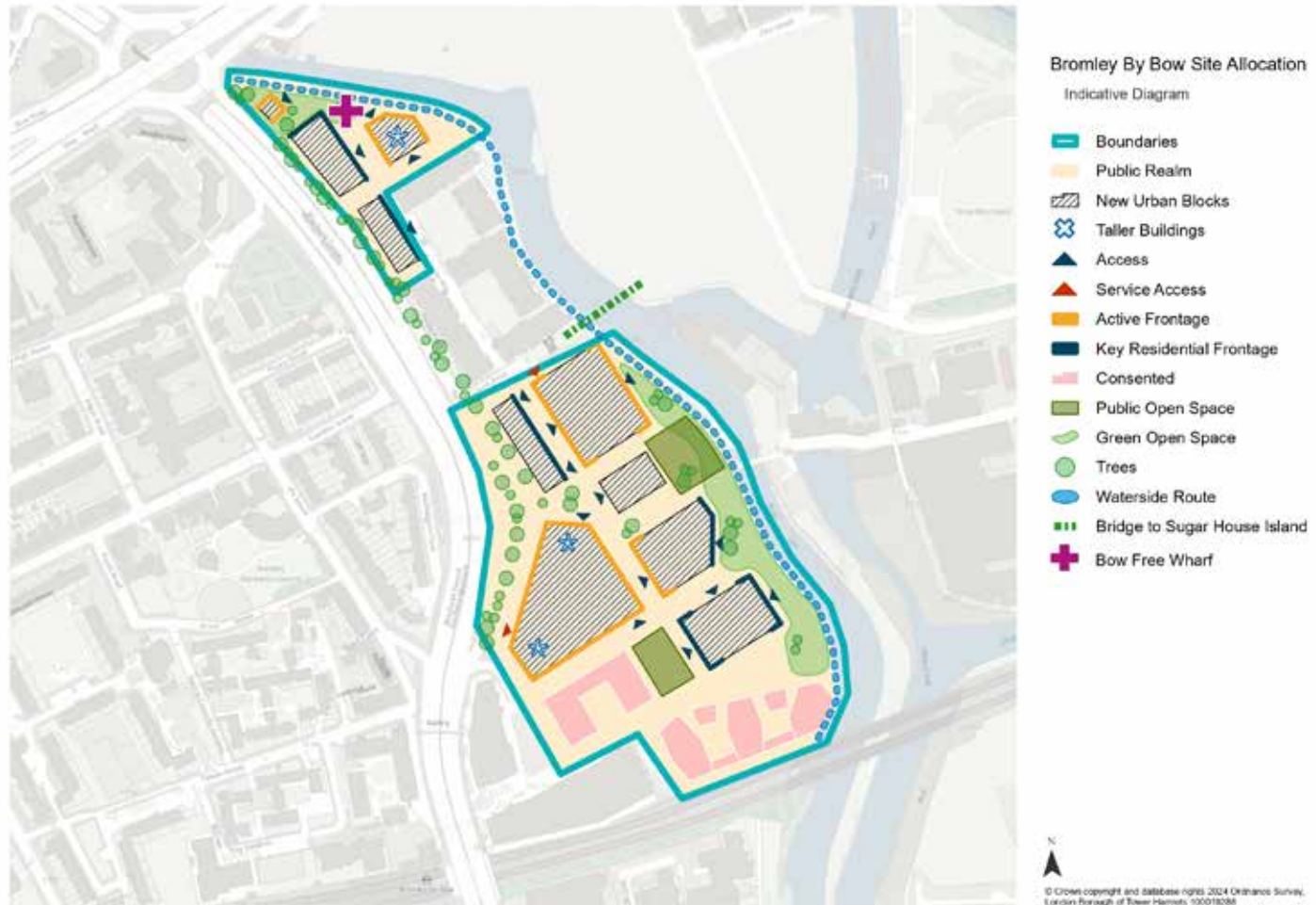
- Improve walking and cycling connections to, from and within the site. These should align with the existing urban grain to support permeability and legibility. The existing complex network of streets and cul-de-sacs should be replaced by a permeable street grid network which fully integrates and makes direct connections with its context creating a stronger and more legible street network across the estate. Improved green grid routes should be delivered along Aberfeldy Street, Blair Street, and Abbott Road, with good onward connections provided to Jolly's Green and green grid routes across the A12 and A13 and towards the Leven Road and Teviot Estate site allocations.
- Aberfeldy Street will be a strong and more legible public route across the estate, which will better establish connections with new development to the south and provide direct connections to the riverside area at the north.

Environment and public realm

- Existing open space at Millennium Green, Leven Road Park, and Braithewaite Park should be retained and improved. There should be a net increase in the overall provision of public open space through redevelopment of the site. Access to the public open space should be improved, alongside improvements to the facilities and quality of the space itself.

3.4 Bromley by Bow

Figure 37: 3.4 Bromley by Bow (indicative)



Site information	Details
Address	Hancock Road/Three Mill Lane
Area [ha]	6.26
Ward	Bromley North
PTAL [2031]	4-6a
Planning designations Page 462	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Site of Importance for Nature Conservation (Lea Valley, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Three Mills) ● Statutory listed buildings (Tide Mill, grade I; Clock Mill, grade II; Office Opposite Clock Mill, grade II; and Paved Roadway between House Mill and Clock Mill, grade II; all adjacent to the site)
Relevant Permissions	17/00344/FUL – Imperial Street - Development of a mixed-use scheme to include five buildings, ranging between 3 and 14 storeys in height, which would comprise 407 residential units, 339 sqm of employment space, 274 sqm of flexible retail space.

Site proposal	Details
Indicative capacities	1,300 homes (400 on Imperial Street site, 200 on North Bow River Village site, 700 on Tesco site) 20,000sqm commercial/community floorspace

Site proposal	Details
Phasing	2024-29, 2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses, and provision of a primary school, community centre, and improved connections across the River Lea.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school
 - Community centre
 - Safeguarded bridge landings for improved connections across the River Lea
 - Improved A12 junction
 - Strategic consolidated open space of minimum 1.2 hectares
- Proposals will need to include an appropriate mix and balance of uses that together have the potential to function as a District Centre.
- The site is in multiple ownership, and landowners and developers should work together to implement a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- Landing for bridges from Sugar House Lane will need to be incorporated into development proposals. The opportunity to create

a new ped/cycle bridge link over the River Lee Navigation to the regeneration of the Hunts Lane area should be explored.

- This site could potentially be suitable for accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.
- Development must ensure the full operational use of Bow Free Wharf can continue unimpeded, and that new development is designed in such a way that residents will not be exposed to excessive noise or other forms of pollution from the wharf. Vehicle access to the wharf should be designed in such a way as to minimise conflict between wharf uses and residential uses.

Form, massing, and heritage

- Height Strategy: Appropriate height of 50m at the tallest point, which should be located to the south of the site, on the Imperial Street plot. Additional taller points with an appropriate height of 44m can be located towards the western side of the Tesco site and on the northern part of the site. Building heights should step down towards the east of the site.
- A hard urban edge should be formed along the urban A12 frontage, with builds typically rising to approximately 10 storeys. A softer, more informal and stepped down edge should be formed along the river front - taking proper account of the historic character of the Three Mills Island area.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant

Conservation Area Character Appraisals.

Routes and streets

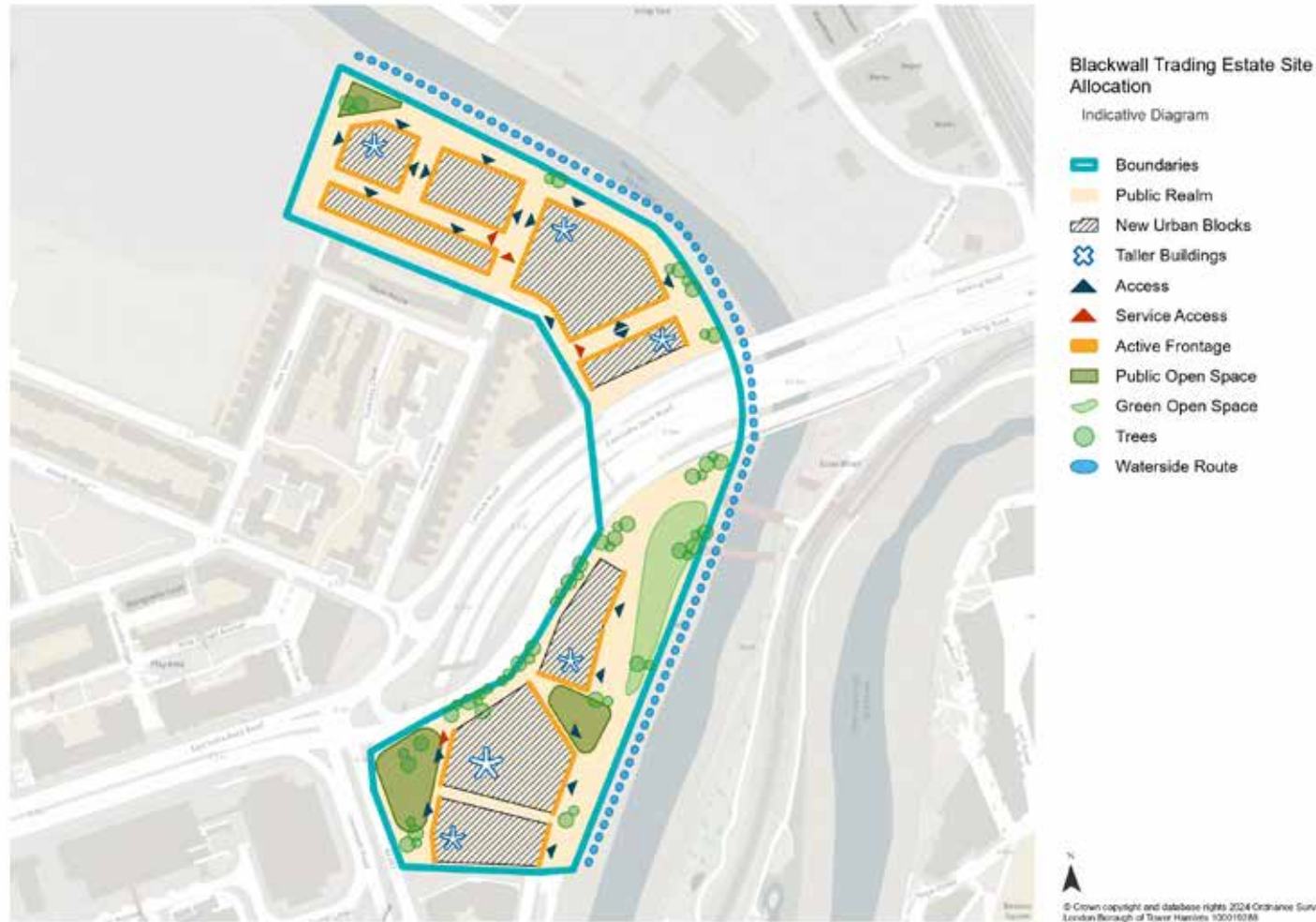
- To maximise the opportunities to deliver a successful new centre and community in this location, improved linkages across the A12 (including through measures to improve safety in the underpasses beneath the A12) and links to the east across the River Lea are essential to improve local and wider connectivity and integration of new and existing communities across the area.
- An improved junction which provides vehicular and pedestrian access from the site to and across the A12 is required, to improve access to the wider Bow area and to Bromley-by-Bow Station. This should include at-grade pedestrian and cycle crossings and the potential to facilitate the 'Bow Vision' bus route, connecting through Bromley-by-Bow to Sugar House Island via a potential new bridge.
- Development must provide public access along the waterfront at the River Lea, and improved access points onto the north canal towpath. Improved green grid routes should be delivered along Three Mills Lane, Imperial Street, and along the River Lea waterfront, with good quality onward connections across the A12 to join the rest of the green grid. Careful consideration should be given as to how to best route the riverside path around Bow Free Wharf to ensure its continued operation.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- High quality new public open spaces should be created along the waterfront, particularly focused on the area where Three Mills Lane crosses the River Lea.

3.5 Blackwall Trading Estate and Leamouth Road Depot

Figure 38: 3.5 Blackwall Trading Estate and Leamouth Road Depot (indicative)



Site information	Details
Address	Leamouth Road/Lanrick Road
Area [ha]	5.10
Ward	Poplar/Blackwall and Cubitt Town
PTAL [2031]	1b-5
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Site of Importance for Nature Conservation (River Thames and Tidal Tributaries, and Bow Creek Ecology Park, both adjacent to the site) ● Local Industrial Location (Blackwall Trading Estate) ● Archaeological Priority Area (Lea Valley, Tier 3; and Limmo, Tier 2) ● Tall Building Zone (Leamouth) ● Statutory listed buildings (Entrance Gateway, grade II; and East India Dock Wall and Gateway, grade II; both adjacent to the site)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	775 homes (375 on depot site, 400 on trading estate site) 35,000sqm non-residential floorspace 6,500sqm replacement depot (if needed)

Site proposal	Details
Phasing	2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential- and light industrial-led scheme, with some potential for other commercial uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Light industrial uses (Class E) – must at least replace the current floorspace
 - Commercial and town centre uses (Class E)
 - Community uses (Class F1/F2)
 - Replacement council depot – if needed (Sui generis)
- Required on-site infrastructure includes:
 - NHS primary health care facility or community facility (as needed)
 - A13 connector bridge – passing underneath the A13
- The site is partly within a Local Industrial Location, and development must provide at least the same amount of light industrial floorspace as currently exists on the site, and this may be secured by condition or other legal agreement as light industrial space in perpetuity.
- The site currently contains a council vehicle depot. This should be reprovided as part of development, unless a separate site elsewhere can be secured for a suitable depot use, in which case the floorspace that is freed-up by the relocation of the depot should be used for additional housing and active ground floor uses.
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is

delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.

Form, massing, and heritage

- Height strategy: The tallest points should be located towards the southern end of the site. Heights should step down towards the centre of the site, and rise up again along the River Thames in the northern part of the site.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals, and the Tower Hamlets Views and Landmarks Study.

Routes and streets

- Improve walking and cycling connections to, from and within the site, particularly along the river and towards the new park and bridge crossings at the Leven Road site allocation, and towards City Island neighbourhood centre and Canning Town town centre and underground station in the London Borough of Newham. These should align with the existing urban grain where possible to support

permeability and legibility, and should connect to the adjacent Leven Road site allocation.

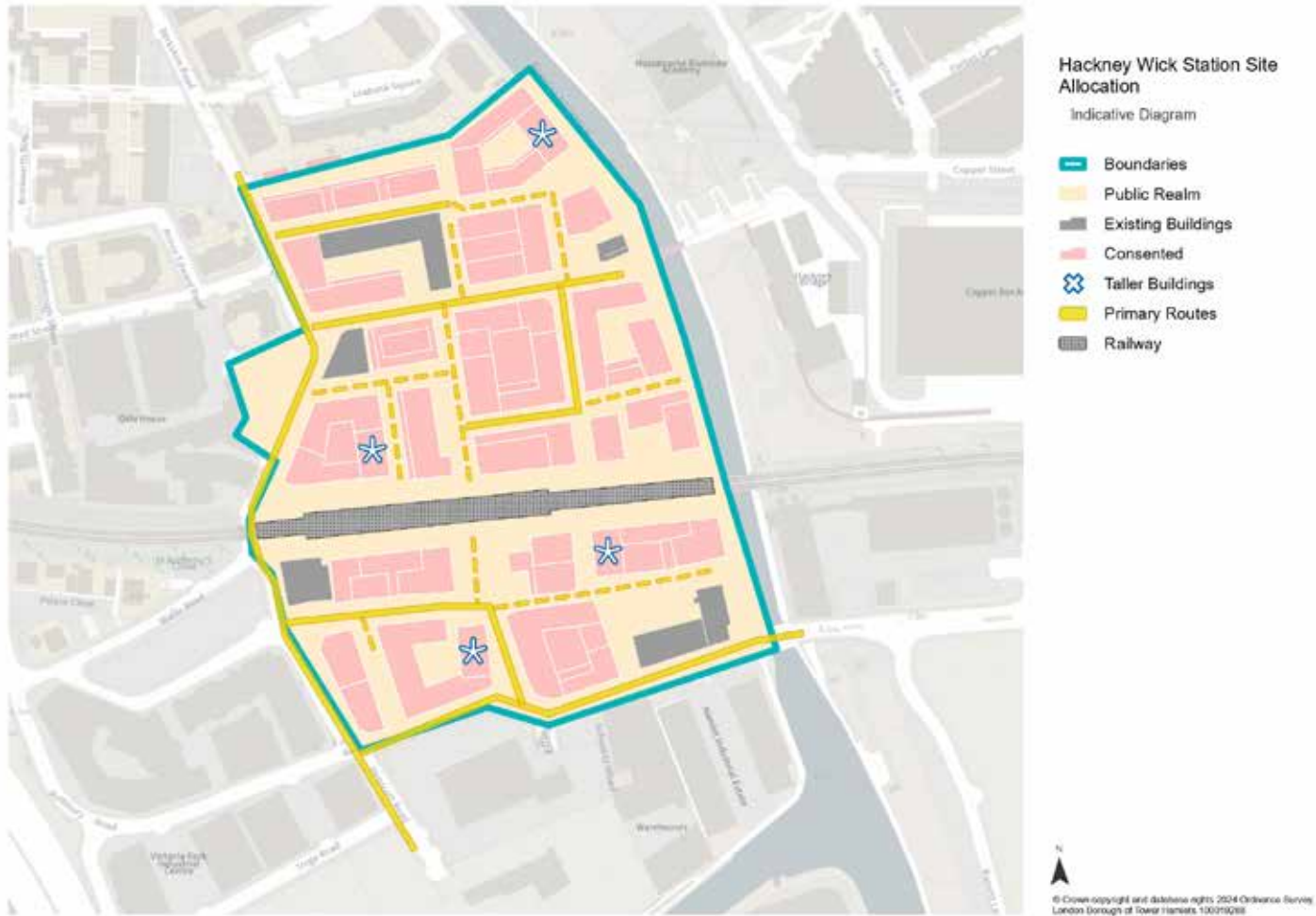
- Land should be secured to provide a connector bridge that runs underneath the A13 to connect both sides of the site, to complete the pathway up the River Lea, and to allow pedestrians and cyclists to travel north and south without needing to cross the busy A13, giving easier access to facilities at Aberfeldy neighbourhood centre and open space on the Leven Road site allocation.
- Development must provide public access along the waterfront at the River Lea. Improved green grid routes should be provided along Oban Street and along the River Lea waterfront, with good quality onward connections towards the green grid at Abbott Road and the Leven Road and Aberfeldy Estate site allocations.
- Vehicle movements around the redeveloped light industrial space and the redeveloped depot should be carefully considered to minimise conflict between pedestrians, cyclists, and motorised vehicles.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- Incorporate a significant amount of riverside public open space, with elements of biodiversity that complement the adjacent Bow Creek Ecology Park Site of Importance for Nature Conservation across the River Lea in the London Borough of Newham.

3.6 Hackney Wick Station

Figure 39: 3.6 Hackney Wick Station (indicative)



Site information	Details
Address	White Post Lane
Area [ha]	6.39
Ward	Bow East
PTAL [2031]	3-4
Planning designations Page 468	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Site of Importance for Nature Conservation (Lea Valley, adjacent to the site) ● Metropolitan Open Land (Lee Valley Regional Park, adjacent to the site) ● Town centre (Hackney Wick neighbourhood centre) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Fish Island)
Relevant Permissions	16/00166/OUT – Hackney Wick Masterplan - Outline planning application for the demolition of 28,281sqm of existing buildings on site and development of a phased comprehensive mixed use development of up to 119,242sqm floorspace. Residential of up to 78,931sqm to deliver approx. 874 units; Employment of a minimum of 29,908sqm; Retail of up to 4,493sqm; and Community Facilities for a minimum of 381sqm and up to 2,318sqm.

Site information	Details
Relevant Permissions	16/00271/OUT – Queen's Yard - Hybrid planning application comprising outline planning permission for a new theatre providing up to 1,500sqm of floorspace, and detailed planning permission for the demolition of all buildings on site and mixed use redevelopment to provide flexible commercial floorspace, residential, and enhanced public realm. 17/00112/FUL – 55-69 Rothbury Road - Demolition of buildings/structures and redevelopment of the site, comprising the erection of a five-storey building, plus basement level, with a total gross internal floor area of 2630sqm of Class B1 (Business) floorspace with shared amenities and facilities. 22/00095/RMA – Hackney Wick Masterplan - Application for the Approval of Reserved Matters of layout, scale, appearance and landscaping for Plot E/F, Plot J East and Plot K2 North of the Hackney Wick Masterplan to provide 190 residential units, 3,984sqm commercial space and 180sqm community/leisure space.

Site proposal	Details
Indicative capacities	800 homes across the whole site (300 on Tower Hamlets portion of site) 6,500sqm commercial and community floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, employment-focused scheme with a mix of residential, retail, workspace, and creative and cultural uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Retail/town centre uses (Class E)
 - Employment uses (Class E)
 - Community uses (Class F1/F2)
 - Theatre (sui generis)
- Required on-site infrastructure includes:
 - Community facility
- This is a cross-boundary site with the London Borough of Hackney. Development should coordinate consultation across planning authorities and address cross-boundary issues.
- Proposals on this site should be in accordance with the principles of the Hackney Wick Masterplan.
- Development should deliver a mix of uses around the rebuilt Hackney Wick Station, integrate with established retail frontage at Felstead Street and Prince Edward Road, and utilise buildings of heritage value.

- The overall amount of existing employment floorspace (B Use Class) within the allocation boundary must be maintained, with a particular emphasis on retaining and providing for creative and cultural industries and any other businesses that are compatible with residential use.
- Queen's Yard will act as a high-quality public space defined by a mixture of cultural and public uses that complement existing uses such as The White Building and the Yard Theatre. In line with policy CI5, development should aim to protect the theatre use on this site.
- Workspace provision should be provided at both upper and ground-floor levels to acknowledge the variety of workspace typologies.
- This site could potentially be suitable for extra-care accommodation.

Form, massing, and heritage

- Height Strategy: Appropriate height of 43m at the tallest point, which should be located towards the centre of the site, between White Post Lane and Rothbury Road. An additional taller point with an appropriate height of 33m should be located on the Queen's yard site, with heights stepping down around these higher points.
- The impact of development on nearby conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- A new direct and legible north-south connection which structures the heart of the area should be delivered between Wallis Road and Monier Road, integrated with Hackney Wick Station and an improved bridge over the Hertford Union Canal extending from Roach Road. A fine grain of streets, passageways and yards should be established that should create informal secondary connections to the canal edge.
- Development must provide public access along the waterfront at the Lee Navigation Canal. Improved green grid routes should be provided along the Lee Navigation Canal, with good quality onward connections to the green grid route along the Hertford Union Canal.

Environment and public realm

- Existing streets should be reinforced with strong building edges and active ground floors, and new high quality public realm should be provided throughout the allocation. Queen's Yard should act as a high quality public space defined by a mixture of cultural and other public uses.

3.7 Hepscoth Road

Figure 40: 3.7 Hepscoth Road (indicative)



Site information	Details
Address	Hepscott Road/Tregro Road
Area [ha]	3.08
Ward	Bow East
PTAL [2031]	3
Planning designations Page 472	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Site of Importance for Nature Conservation (London's Canals, and Disused Railway, Bow, both adjacent to the site) ● Metropolitan Open Land (Lee Valley Regional Park, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Fish Island and White Post Lane)

Site information	Details
Relevant Permissions	<p>16/00451/OUT - Hybrid' planning application for mixed-use redevelopment of 2.88ha site comprising: up to 39 new/refurbished buildings/blocks to provide for a mix of land uses comprising: Residential (475 units); Commercial and Community Uses (up to 11,018sqm).</p> <p>17/00225/FUL - Application for full planning permission for demolition of the existing building and erection of a new building ranging between one and six storeys in height to provide 1,915sqm of commercial floorspace at ground and lower-ground floor level and 52 residential units on the upper floors.</p>

Site proposal	Details
Indicative capacities	525 homes 11,000sqm commercial and community floorspace
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, and creative and cultural uses, and delivery of a linear park and crossings of the canal.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Improved crossing of the Hertford Union Canal
 - Strategic consolidated open space of at least 1.2ha
- Development should enable the delivery of improved or new north-south connections across the canal
- This site could potentially be suitable for extra-care accommodation.

Form, massing, and heritage

- Height Strategy: Appropriate height of 32m, with buildings varying in height across the site.
- The impact of development on nearby conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Development should provide new walking and cycling routes through the site providing connections to the Hertford Union Canal towpath, Roach Point Bridge, and Hackney Wick Station. Development must provide public access along the waterfront at the Hertford Union Canal. Improved green grid routes should be provided along the Hertford Union Canal waterfront, with good quality onward connections to the rest of the green grid network, including along the Lee Navigation Canal.

Environment and public realm

- Development should respond positively to the waterside setting, enhance the character of the canal and enhance strategic views west towards central London.
- Proposals should provide a high-quality frontage and deliver public realm improvements to Wansbeck Road.

3.8 Sweetwater

Figure 41: 3.8 Sweetwater (indicative)



Site information	Details
Address	Carpenters Road/Bassett Lane
Area [ha]	11.16
Ward	Bow East
PTAL [2031]	1b-3
Planning designations	<ul style="list-style-type: none"> ● Site of Importance for Nature Conservation (Lea Valley, adjacent to the site) ● Metropolitan Open Land (Lee Valley Regional Park, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Fish Island)

Site information	Details
Relevant Permissions	11/90621/OUTODA – Sweetwater masterplan - Comprehensive, phased, mixed use development within the future Queen Elizabeth Olympic Park.
	13/00508/REM - Application for the approval of reserved matters for hard and soft landscaping for Canal Park.
	16/00039/REM – Reserved Matters application for the provision of a two form entry primary school, as well as playing field and associated changing rooms.
	21/00069/REM – Sweetwater Phase 4 - Application for the approval of reserved matters for the development of 373 residential units, 452sqm retail floorspace, 733sqm employment floorspace, a 493sqm nursery and a 896sqm space for library use and community use.
	21/00042/REM – Sweetwater Phase 5 - Application for the approval of reserved matters for the development of 399 residential units, a 1,257sqm health centre or retail floorspace, 584sqm retail floorspace and 272sqm flexible retail/employment floorspace.

Site proposal	Details
Indicative capacities	775 homes 4,500sqm commercial and community floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, and community uses, and provision of a library, nursery, health care facility, and bridges across the canal.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Library
 - HS primary health care facility
 - Nursery
 - Provision of bridges across the Lee Navigation Canal
 - Retention and improvement of existing open space
- New bridge links should be provided across the Lee Navigation that align with the street pattern of Hackney Wick and Fish Island, in order to provide improved access to amenities, movement routes, and transport infrastructure for new residents.
- This site could potentially be suitable for extra-care accommodation.

Form, massing, and heritage

- Height Strategy: Appropriate height of 43m at the tallest point, which should be located in the northeastern part of the site. Heights should step down gradually towards the south of the site.
- The impact of development on nearby conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

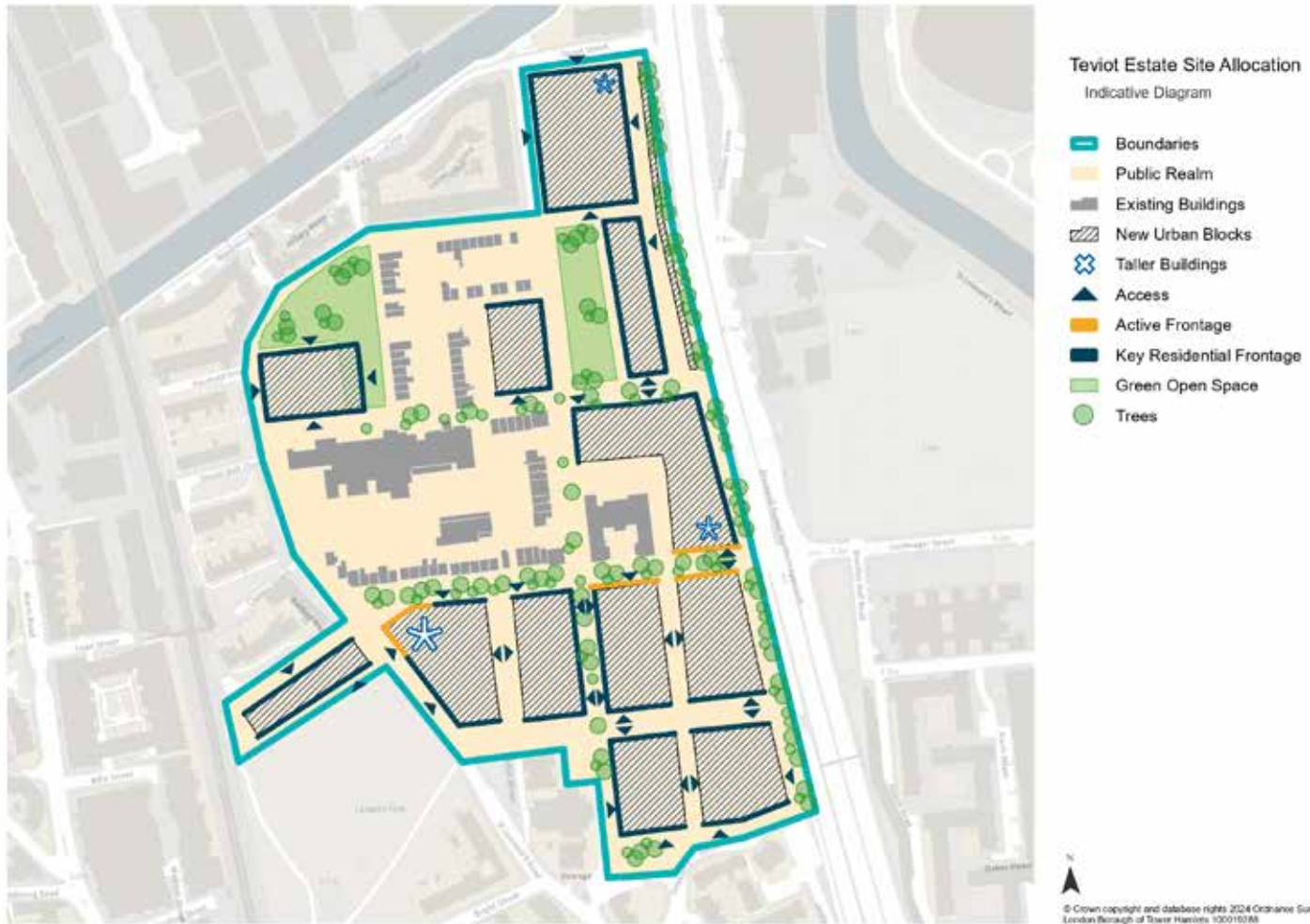
- Development should support the continuation of direct east-west connections from Hackney Wick and Fish Island to the primary school that has already been delivered in the southern part of this site and Queen Elizabeth Olympic Park. Development must provide public access along the waterfront to the east and west of the site.

Environment and public realm

- Active ground floor frontages and high quality public realm should be provided along east-west routes that cross the allocation.

3.9 Teviot Estate

Figure 42: 3.9 Teviot Estate (indicative)



Site information	Details
Address	Teviot Street/Zetland Street
Area [ha]	10.08
Ward	Lansbury
PTAL [2031]	2-4
Planning designations Page 478	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (London's Canals, adjacent to the site) ● Metropolitan Open Land (Lee Valley Regional Park, adjacent to the site) ● Publicly Accessible Open Space (Wyvis Street Open Space; and Langdon Park – adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Langdon Park; and Limehouse Cut and Balfron Tower, adjacent to the site) ● Statutory listed buildings (Church of St Michael and All Angels, grade II; and War Memorial, grade II)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	1,200 homes 5,000sqm commercial/community floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses, and provision of a primary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school expansion (with reprovision of any playing fields, MUGAs, or sports facilities)
 - Community facility
 - Improvements to existing open spaces at Langdon Park and Uamvar Street
 - Safeguarded landing space for bridge across Limehouse Cut Canal
- A cluster of local retail and community uses could be reprovided along Zetland Street from the current location on Teviot Street.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.

Form, massing, and heritage

- Height Strategy: Appropriate height of 50m at the tallest point, which should be located in the western end of the site near Langdon Park. Along the A12, buildings should reach an appropriate height of 36-39m. heights should step down away from these points.
- A strong built frontage should address the A12 along the site's eastern boundary. The scale of development along the A12 edge should vary, to avoid a feeling that the estate is presenting a 'wall' to the road and turning inwards. Given the busy nature of this principal urban road, building frontages should step away from the route. This may permit some mitigation measures along the route to be introduced to help delivery better air quality and help manage noise pollution issues.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes ensuring that development does not undermine the setting of, and views towards, Balfron Tower. The prominence of Balfron Tower should be preserved from borough-designated viewpoints. Any tall buildings in these views must be subservient to Balfron Tower and be located so that they do not disrupt the silhouette of the building on the skyline. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals, and the Tower Hamlets Views and Landmarks Study.

Routes and streets

- Improve walking and cycling connections to, from and within the site. These should support permeability and legibility. In particular, improving east-west permeability is a priority, with redevelopment of the estate enabling the establishment of smaller street blocks and a more open and connected set of streets. Development must provide improved public access to the waterfront at the Limehouse Cut Canal. Improved green grid routes should be delivered along Zetland Street and St Leonard's Road, with good quality onward connections to Langdon Park, and to adjoining green grid routes at Chrisp Street across the DLR tracks and at Lochnagar Street across the A12 in the Ailsa Street site allocation.

Environment and public realm

- Opportunities should be sought to extend and improve Langdon Park in its current location by ensuring that all of the park's edges are addressed by good quality frontage. Improved public open space and public realm should also be provided towards the north of the estate, around the community centre.

25. Isle of Dogs and South Poplar

Location

25.1 The Isle of Dogs and South Poplar sub-area is located to the south-east of the borough, bounded by the River Thames to the south, River Lea and the London Borough of Newham to the east, and East India Dock Road to the north.

25.2 The sub-area falls within the London Plan's Isle of Dogs and South Poplar opportunity area.

25.3 The sub-area is a collection of vibrant and distinctive town centres, employment hubs, transport interchanges and residential areas. The sub-area comprises eight distinct character places (see Figure 36). The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Vision

25.4 By 2038, the Isle of Dogs and South Poplar will have a cohesive mix of housing, employment and leisure uses within distinctive, inclusive and vibrant neighbourhoods, which have a strong sense of place.

25.5 South Poplar will be integrated with neighbouring areas in the Isle of Dogs, capitalising on the opportunities in Canary Wharf and Blackwall. New development at Canary Wharf will reinforce and strengthen its role as a global commercial and business centre. There will be additional local employment opportunities in South Poplar and Isle of Dogs to support a range of flexible start-ups and small-to-medium enterprises.

25.6 Development will be of exemplary quality and capable of accommodating densities to support sustainable places and reinforce local character, where appropriate. This will result in a greener and more attractive living and working environment, befitting the waterfront setting.

25.7 Canary Wharf's role as a Metropolitan Centre will expand and diversify to meet the needs of the wider area. Redevelopment of sites will also support revitalised town centres (including new neighbourhood centres at South Quay and London City Island) and a range of functions, such as community facilities and play spaces.

25.8 The opening of the Elizabeth line will facilitate the provision of new homes and jobs to serve both existing and future communities. New and enhanced connections across strategic roads, docks and the River Thames, together with public realm improvements, will enhance walking and cycling across the area. Further improvements to the sustainable transport network (including enhancements to the Docklands Light Railway and river-based services) will allow people to better access jobs, services and visitor attractions.

Objectives

- a. Support the delivery of high quality interconnected places which respond to local heritage assets and the area's distinctive character
- b. Address severance across the area and to surrounding areas through connectivity enhancements as well as new linkages over the waterways and road network
- c. Manage development intensification and associated impacts on the environment and existing communities

- d. Support vibrant and mixed town centres through enhancing the commercial and office employment offer in Canary Wharf as well as a range of flexible small-to-medium enterprises in surrounding areas
- e. Deliver new and improved open and water spaces, which are accessible and well integrated into new development
- f. Improve the transport network and secure the necessary strategic and local infrastructure, such as schools, health and community facilities.

Site allocations in the Isle of Dogs and South Poplar sub-area

- 4.1 Aspen Way
- 4.2 Billingsgate Market
- 4.3 Crossharbour
- 4.4 Limeharbour
- 4.5 Marsh Wall East
- 4.6 Marsh Wall West
- 4.7 Millharbour
- 4.8 North Quay
- 4.9 Reuters
- 4.10 Riverside South
- 4.11 Westferry Printworks
- 4.12 Wood Wharf
- 4.13 10 Bank Street
- 4.16 Westferry/Park Place

4.1 Aspen Way

Figure 43: 4.1 Aspen Way (indicative)



Site information	Details
Address	Aspen Way
Area [ha]	5.48
Ward	Poplar
PTAL [2031]	3-5
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Area of deficiency of access to nature ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Poplar) ● Archaeological Priority Area (Isle of Dogs, tier 3; and Poplar, tier 2) ● Conservation Area (St Mathias Church) ● Statutory listed buildings (New City College, Grade II)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	780 homes 21,000sqm educational floorspace 2,000sqm other non-residential floorspace
Phasing	2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the reprovision of a college, community centre, football pitches, and transport depot.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
 - Transport facilities (Sui generis)
- Required on-site infrastructure includes:
 - Reprovision of college
 - Reprovision of community centre and associated football pitches (of at least equivalent quality and size as the current football pitches on site)
 - Reprovision of DLR depot
 - Improved pedestrian crossing over Aspen Way
 - Strategic consolidated open space of minimum 1 hectare
- Development should enable the continued use of the existing depot.
- Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD. This has been developed between landowners and the council in order to positively address the social, economic and environmental disparities between Poplar and Canary Wharf.
- Where landowners and developers can reach agreement on potential land swaps, different options for massing and layout of the site may be acceptable.

Form, massing, and heritage

- Height Strategy: Appropriate height of 91m at the tallest point, which should be in the southern-central portion of the site. Heights should step away from this point to the east and west, and should step away significantly towards the existing lower scale residential context to the north.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. The setting of adjacent housing should also be protected through appropriate greening and landscaping. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

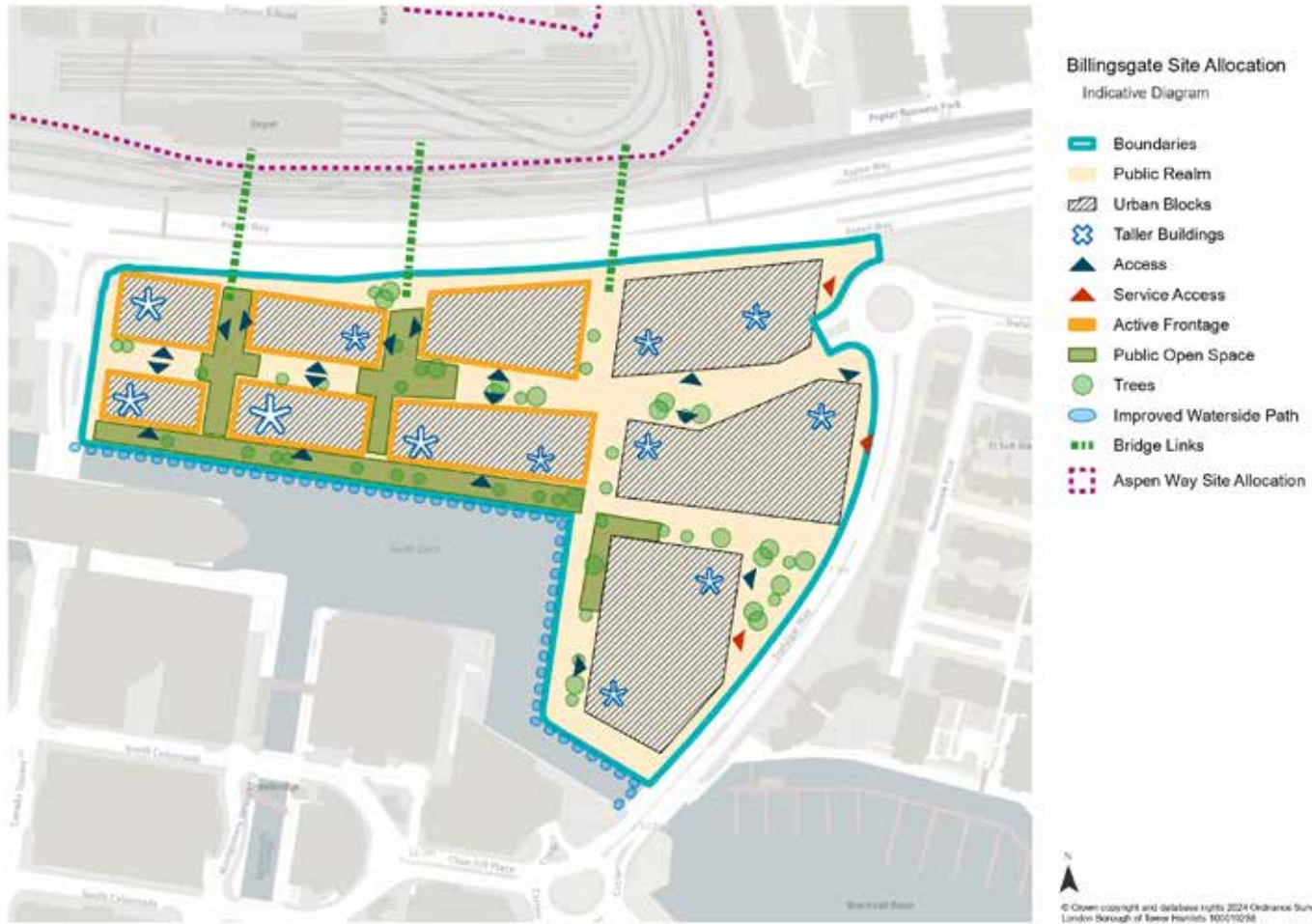
- Address the physical barriers and poor connectivity created by Aspen Way, with new and improved walking and cycling routes. This could be facilitated through the provision of improved connections, including new bridges or decking across Aspen Way connecting the site to the Billingsgate Market and North Quay sites.
- Strengthen walking and cycling connections to Poplar DLR station, Poplar High Street, East India Dock Road and Canary Wharf station. Green grid improvements should be delivered along Poplar High Street and through the site towards Poplar DLR station, with good quality onward connections to Poplar Recreation Ground and across Aspen Way.

Environment and public realm

- Create a positive sense of place with a public square and public green open space that integrates north-south links and Poplar DLR station, and improve the quality of spaces around and between buildings and movement through the area.
- Across the South Poplar Masterplan area, development should coordinate to manage surface water to enable discharge into the docks to the south.

4.2 Billingsgate Market

Figure 44: 4.2 Billingsgate Market (indicative)



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Site information	Details
Address	Trafalgar Way
Area [ha]	5.75
Ward	Canary Wharf
PTAL [2031]	4-6a
Planning designations Page 486	<ul style="list-style-type: none"> ● Area of substandard air quality ● Skyline of Strategic Importance ● Flood risk area ● Tower Hamlets Activity Area ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Statutory listed buildings (Quay Walls, Copings and Buttresses to Import Dock and Export Dock, Grade I; Accumulator Tower, Grade II)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	3,000 homes 66,000sqm commercial floorspace 23,000sqm retail floorspace
Phasing	2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses.
- Acceptable land uses include:
 - Residential (Class C3) – maximum 75% of floorspace
 - Town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
 - Warehousing/freight facilities (Sui generis)
- Required on-site infrastructure includes:
 - Community centre
 - Improved pedestrian crossing over Aspen Way
- The operations of Billingsgate Market should be appropriately re-provided at a suitable location within London.
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.
- Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD. This has been developed between landowners and the council in order to positively address the social, economic and environmental disparities between Poplar and Canary Wharf.
- An assessment should be carried out to understand the potential contamination on site prior to any development taking place.

Form, massing, and heritage

- Height Strategy: The tallest point should be located in the western portion of the site, with additional taller points on either side.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from north.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site, particularly with a new east to west cycle route through the site. Walking and cycling routes should integrate the site with Poplar to the north; North Quay and Canary Wharf Elizabeth line station; and to the wider area. These routes should align with the existing urban grain to support permeability and legibility. Development must provide public access along the waterfront at North Dock. Green grid improvements should be delivered along the waterfront at North Dock, with good quality onward connections to green grid routes through the Wood Wharf and North Quay allocations.

- Address the physical barriers and poor connectivity created by Aspen Way, with new and improved walking and cycling routes. This could be facilitated through the provision of improved connections, including new bridges or decking across Aspen Way connecting the site to the Billingsgate Market and North Quay sites.
- New public routes should be established – with one central primary east-west connection through the centre of the site together with further east-west routes at the northern and southern site boundaries. In addition, as the site widens to the east, multiple new connections should be established with Trafalgar Way.

Environment and public realm

- Provide publicly accessible open space of at least 0.4 hectares in size, which should be easily accessible from across the site and connected to the green grid route along the waterfront.
- Development should prevent excessive overshadowing and enable activation of the dockside by stepping back development from North Dock.
- Enhance legibility and have a clear distinction between public and private spaces, by way of improving public realm particularly along the dockside, providing a continuous walkway with supporting active ground floor uses and frontages, and address the severance caused by Trafalgar Way.
- Great care will need to be taken to ensure the quality of environment and public realm is appropriately high and fully accessible in view of the need to address level changes and the need to link to the northern prospect of a public connection across Aspen Way.
- Across the South Poplar Masterplan area, development should coordinate to manage surface water to enable discharge into the docks to the south.

4.3 Crossharbour

Figure 45: 4.3 Crossharbour (indicative)



Site information	Details
Address	East Ferry Road
Area [ha]	6.15
Ward	Blackwall and Cubitt Town
PTAL [2031]	1b-5
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Critical Drainage Area (part of the site) ● Flood risk area ● Local Nature Reserve (Mudchute Farm and Park, adjacent to the site) ● Site of Importance for Nature Conservation (Mudchute Farm and Park, adjacent to the site) ● Metropolitan Open Land (Mudchute, adjacent to the site) ● Town Centre (Crossharbour District Centre) ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)
Relevant Permissions	PA/19/02534/A1 – A hybrid planning application (part detailed, part outline) for the comprehensive, mixed-use, re-development of the site. Full details for 526 residential units, flexible commercial floorspace, including a new foodstore, a primary school, community uses.

Site proposal	Details
Indicative capacities	2,500 homes (2,000 on Asda site) 24,000sqm commercial floorspace (17,000sqm on Asda site)
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the provision of a health centre, primary school and community centre.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - NHS primary health care facility (reprovision and expansion)
 - Primary school
 - Community centre
 - Transport interchange
- Redevelop and improve the town centre with an anchor supermarket and a range of retail, leisure and community uses with sizes which can support independent providers. A new supermarket should be provided before the existing supermarket is redeveloped to ensure a continued service for local people. Within the town centre, active frontages and town centre uses should predominate at ground level.
- Delivery of new routes and the public square should be prioritised within the phasing timetable.

Form, massing, and heritage

- Height Strategy: Appropriate height of 115m at the tallest point, which should be located on the eastern side of East Ferry Road. On the western side of East Ferry Road, an appropriate height of 85m at the northern part of the site, with heights stepping down towards the south. Heights should step down toward the edges of the site in response to existing residential and the park.
- Protect and enhance the setting of the Maritime Greenwich world heritage site.

Routes and streets

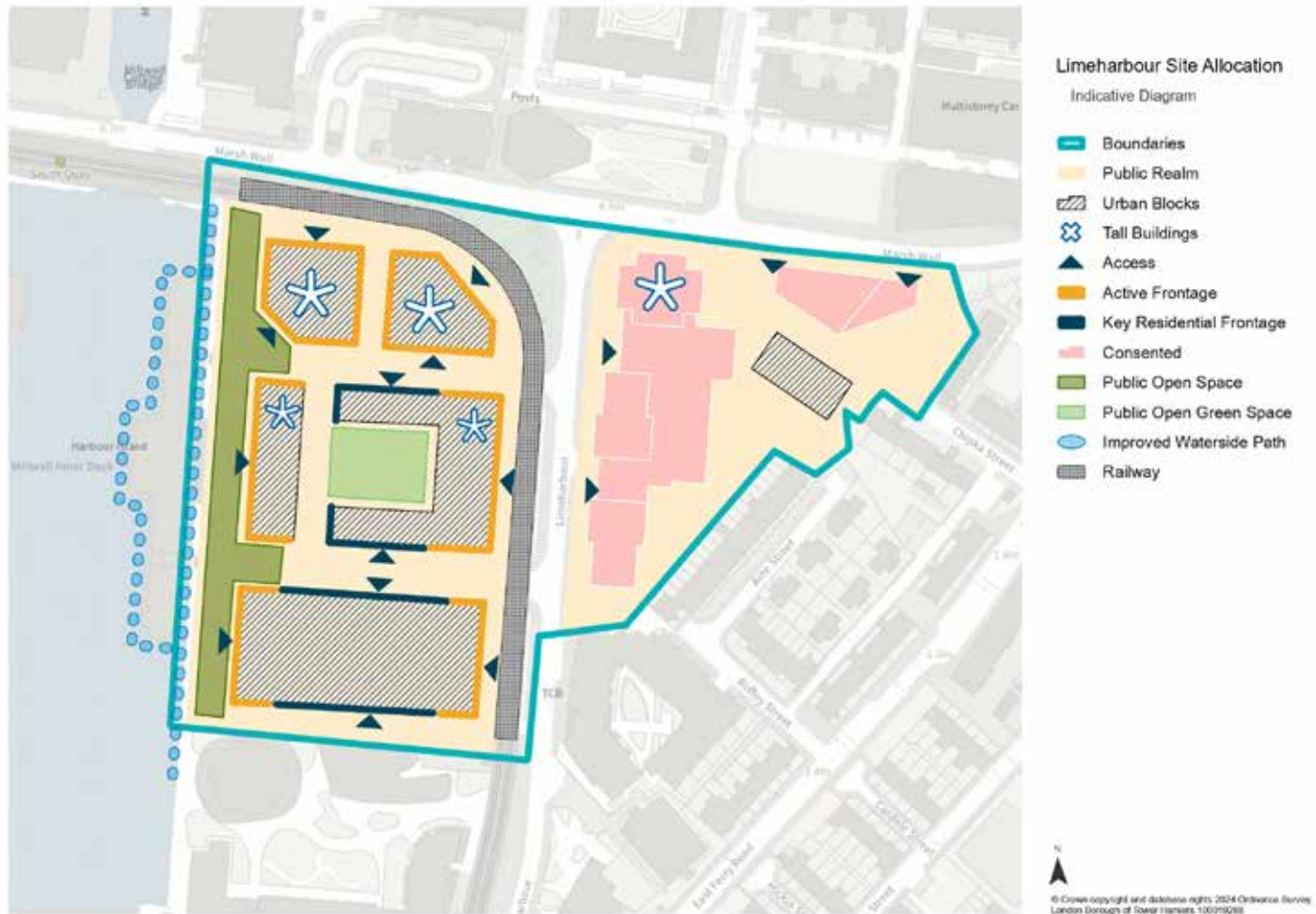
- Improve walking and cycling connections to, from and across the site to establish connections to the new public square, Crossharbour DLR station and Mudchute Park. These routes should acknowledge the existing urban grain to support permeability and legibility. On the eastern side, pedestrian connections established with Glengall Grove would help local permeability. On the western side, the alignment of the DLR line means that additional connections and linkages cannot be made although the alignment of Selsdon Way should be retained. Improved green grid connections should be delivered through the site, with good quality onward connections to green grid routes along Glengall Grove and Pepper Street.

Environment and public realm

- Improve public realm with active site edges, particularly along East Ferry Road and adjacent to Mudchute Park, and reinforce and complement local distinctiveness and create a positive sense of place with the provision of a new public square in the centre that is framed by the development.

4.4 Limeharbour

Figure 46: 4.4 Limeharbour (indicative)



Site information	Details
Address	Limeharbour
Area [ha]	5.25
Ward	Blackwall and Cubitt Town
PTAL [2031]	3-4
Planning designations Page 492	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Critical Drainage Area (part of the site) ● Flood risk area ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)
Relevant Permissions	PA/17/01597 – Construction of a new mixed use development consisting of five buildings ranging from ground plus 3 to ground plus 48 storeys in height comprising 579 residential units; a two-form entry primary school with nursery facilities; a 10,272 sq. m SME Business Centre; 2,228 sq. m of flexible commercial floorspace (Resolution to grant permission).

Site proposal	Details
Indicative capacities	1,900 homes (approximately 1,250 across whole Harbour Exchange site, remainder on Skylines site) 39,000sqm commercial floorspace
Phasing	2024-29, 2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with some employment spaces.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community centre
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

Form, massing, and heritage

- Height Strategy: The tallest point should be located in the north of the site, along Marsh Wall, east of Limeharbour. Additional taller points to the west of Limeharbour along Marsh Wall. Height should step down towards the southern end of the site.
- Create a series of buildings scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall and Limeharbour. Massing should be varied so as to avoid creating a canyon-like environment along Marsh Wall.
- Protect and enhance the setting of the Maritime Greenwich world heritage site and the historic dockside promenade.

Routes and streets

- Create a legible, permeable and well-defined movement network through the site, centred on Limeharbour, Marsh Wall, and the path along Millwall Inner Dock, and connected to the surrounding existing street network and docksides, and to the proposed new bridge crossing to the north. Maintain the existing route alignments across Harbour Exchange Square, to ensure permeability of the site.
- Improve walking and cycling connections to, from and within the site – particularly between Oakland Quay and Limeharbour; Limeharbour and East Ferry Road; and between the dock sides, Canary Wharf Metropolitan Centre and Mudchute Park. These routes should align with the existing urban grain to support permeability and legibility. Development must provide access along the waterfront at Millwall Inner Dock. Improved green grid routes should be provide through

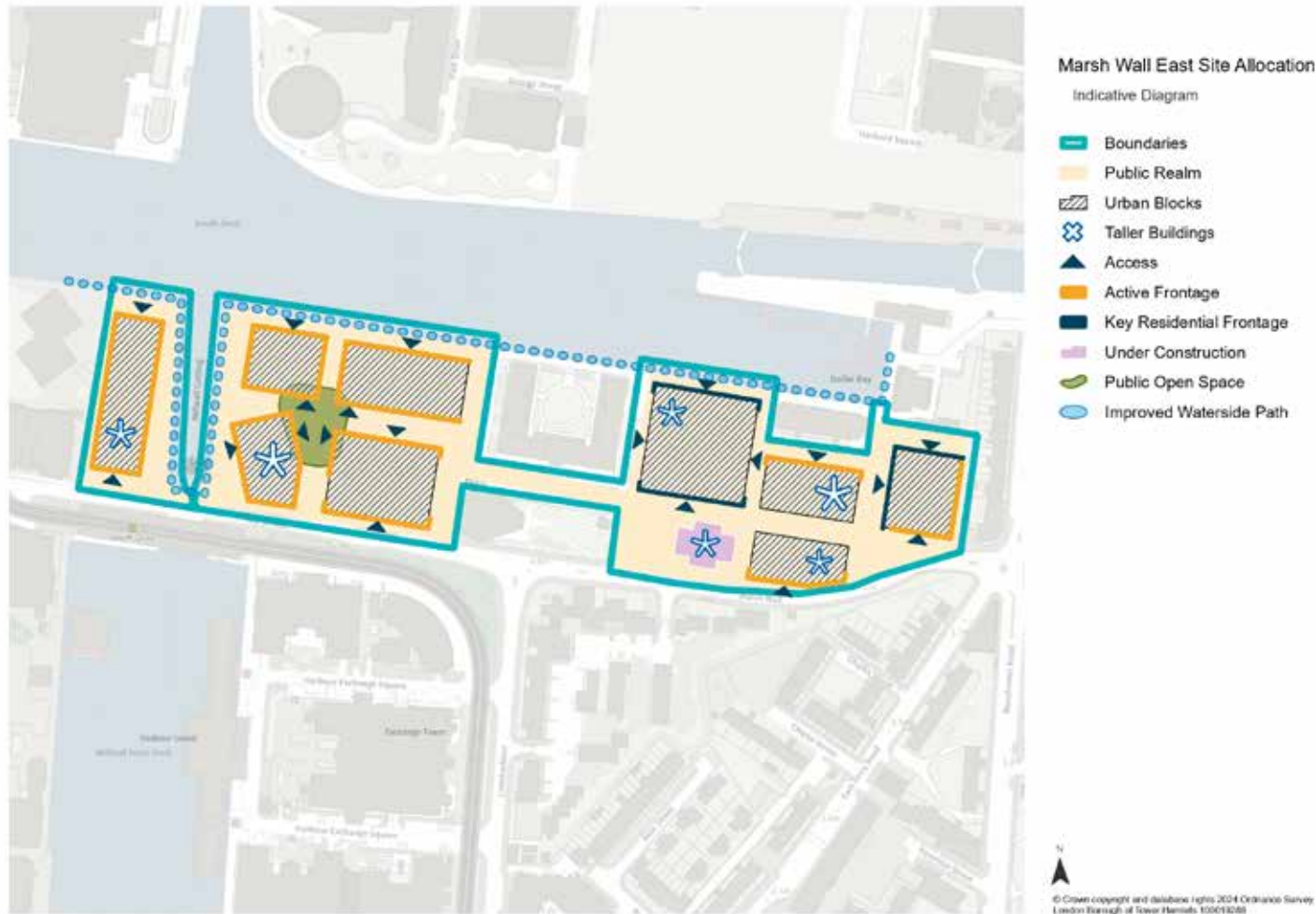
the site and between the different parts of the site, with good quality onward connections to adjoining green grid routes such as those on the Marsh Wall East and Marsh Wall West site allocations.

Environment and public realm:

- Integrate buildings with improved public realm and ensure development is stepped back from the docksides with fully accessible active frontages. The priority for improved public realm is the waterfront edge along Millwall Inner Dock, which should provide space for a range of uses and be well-connected to South Quay DLR station.
- Improve the quality of public realm and create a positive sense of place with an arrival point in the form of an active square at the corner of Marsh Wall and Limeharbour.
- Provide well defined public green open space or public squares with active building frontages around the DLR viaduct. The open space should be well integrated into the development.

4.5 Marsh Wall East

Figure 47: 4.5 Marsh Wall East (indicative)



Site information	Details
Address	Marsh Wall
Area [ha]	4.14
Ward	Blackwall and Cubitt Town
PTAL [2031]	3-4
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Skyline of Strategic Importance ● Flood risk area ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Outer Dock) ● Conservation Area (Coldharbour, adjacent to site) ● Archaeological Priority Area (Isle of Dogs, tier 3)
Relevant Permissions	PA/16/02808 – Redevelopment of the site to provide a building of ground plus 48 storey (maximum height 163.08m) comprising 332 residential units; 810 square metres of community floorspace; 79 square metres of flexible retail/restaurant/community.

Site proposal	Details
Indicative capacities	2,400 homes (approximately 1,475 on western half of site, 332 on 225 Marsh Wall site, 585 on rest of eastern half of site) 10,000sqm hotel floorspace 3,300sqm educational floorspace 45,000sqm commercial floorspace 10,500sqm retail floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with some employment spaces, and provision of a primary school and a health facility.
- Acceptable land uses include:
 - Residential (Class C3)
 - Hotel (Class C1)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school
 - NHS primary health care facility
 - Community centre

- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- The site contains a number of existing buildings, some constructed fairly recently. When demolition and redevelopment is proposed, applications must robustly justify how they meet circular economy and sustainability principles set out in the rest of the development plan.
- Development of residential uses on the eastern half of the site must demonstrate that they have considered and suitably mitigated against potential noise from the data centre uses within this area, in line with the Agent of Change principle.

Form, massing, and heritage

- Height Strategy: The tallest point should be located towards the west of the site, but to the east of the Millwall Cutting. Heights should step down towards the eastern end of the site, and to the west of the tallest point in order to preserve the townscape of the Skyline of Strategic Importance.
- Development should maintain the existing block structure whilst respecting its dockside location and surrounding built environment – in particular providing a transition in scale in relation to the lower rise buildings to the south-east and ensure appropriate spacing between buildings to enable visual permeability between Marsh Wall and

South Dock, and variation in heights to avoid the creation of a canyon-like effect along Marsh Wall.

- Create a series of building scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall and Limeharbour.
- The impact of development on nearby conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.
- Protect and enhance the setting of the Maritime Greenwich world heritage site and the historic dockside promenade.

Routes and streets

- Create a legible, permeable and well-defined movement network through the site, centred on Limeharbour, Marsh Wall, and the waterfront at South Dock, and connecting to the surrounding existing street network and docksides.
- Improve walking and cycling connections to, from and within the site, particularly to the dockside, Canary Wharf Metropolitan Centre and towards Mudchute Park to the south. These routes should align with the existing urban grain to support permeability and legibility. Development must provide public access along the waterfront at South Dock. Improved green grid routes should be delivered along the waterfront at South Dock, with good quality onward connections provided to green grid routes at Manchester Road, and through the Limeharbour and Marsh Wall Werst site allocations.

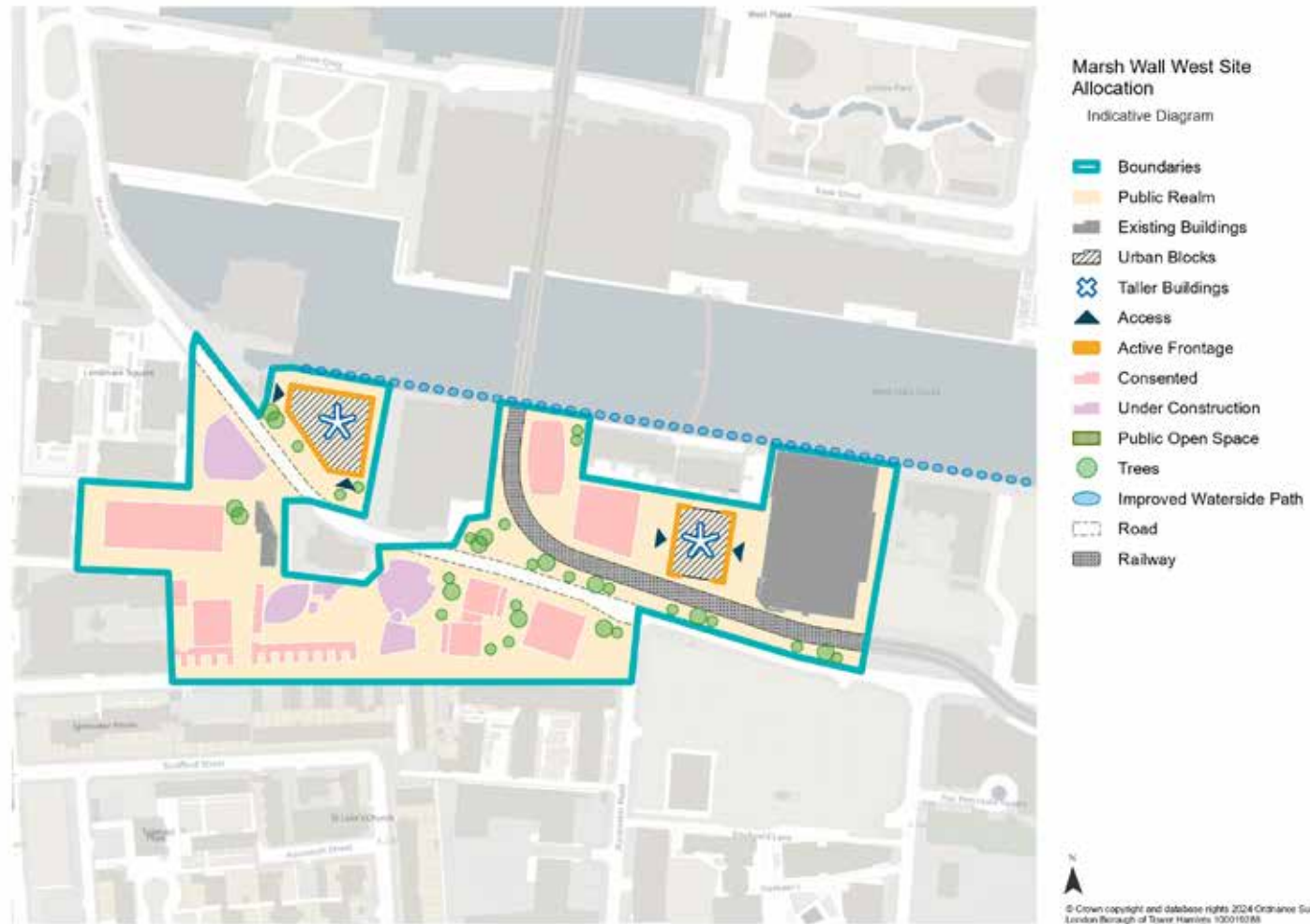
Environment and public realm

- Integrate tall buildings with an improved public realm and ensure development steps back from the docksides with fully accessible active frontages, and consider the operational needs of boat operators.
- Provide well-defined public green open space, particularly along the South Dock waterfront and public squares with active building frontages. Good quality public realm and public open space at the base of the tall buildings proposed here will be key for their successful integration into the wider area.

4.6 Marsh Wall West

Figure 48: 4.6 Marsh Wall West (indicative)

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Site information	Details
Address	Marsh Wall
Area [ha]	4.94
Ward	Canary Wharf
PTAL [2031]	2-5
Planning designations	<ul style="list-style-type: none"> ● Skyline of Strategic Importance (part of the site) ● Critical Drainage Area (part of the site) ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Publicly Accessible Open Space (Lenanton Steps) ● Town Centre (South Quay Neighbourhood Centre) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)

Site information	Details
Relevant Permissions	<p>PA/15/02671 – 50 Marsh Wall, 63-69 and 68-70 Manilla Street - redevelopment to provide three buildings of 65 (217.5m), 20 (79.63m) and 34 (124.15m) storeys above ground comprising 634 residential units, 231 hotel rooms, provision of ancillary amenity space, a new health centre, a new school, ground floor retail uses.</p> <p>PA/16/01637 – 54 Marsh Wall – construction of two new linked buildings of 41 and 16 storeys comprising 216 residential units; two ground floor commercial units totalling 174 sqm GIA fronting on to Marsh Wall.</p> <p>PA/17/03182 – Jemstock 2 – Minor Material amendment to the planning permission PA/15/02104 which gave consent for the: Erection of building facades to existing structure on site to create a mixed use development comprising 206 serviced apartments, 1,844 sqm of office floorspace and 218sqm of cafe floorspace. Amendments include: increase in the number of serviced apartments from 206 to 250 units.</p>

Site information	Details
Page 500	PA/20/02128 – Cuba Street - Erection of single tower block accommodating a high density residential led development with ancillary amenity and play space, along with the provision of a flexible retail space at ground floor, the provision of a new publicly accessible park and alterations to the public highway.
	PA/20/02588 – 30 Marsh Wall - Demolition of existing building and erection of a single building to provide student accommodation along with flexible retail / commercial floorspace.
	PA/20/02649 – Quay House – Demolition of the existing building and redevelopment to provide a mixed use development comprising a hotel and serviced apartments.
	PA/22/00591 – 56-58 Marsh Wall – Demolition of existing buildings and construction of building up to 46 storeys (151.9m) comprising up to 795 co-living units in sui generis use together with communal facilities, non-residential floor space and public realm improvements.

Site proposal	Details
Indicative capacities	2,625 homes (450 on Cuba Street site, 150 on Byng Street/Bellamy Close site, 250 on Britannica hotel site, 650 on Marsh Wall/Manilla Street site, 225 on 54 Marsh Wall site, 500 on Ensign House site, 400 on Beaufort Court site) 1,000 student units (30 Marsh Wall site) 800 co-living units (56-58 Marsh Wall site) 1175 hotel rooms and serviced apartments (225 on Marsh Wall/Manilla Street site, 700 on Quay House site, 250 on Jemstock site)
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with some employment spaces.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community centre
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

Form, massing, and heritage

- Height strategy: Appropriate height of 230m at the tallest point, which should be on the Ensign House site. There should be a variation in heights across the site, with heights generally stepping down towards the west and south of the site.
- Development should maintain the existing block structure whilst respecting its dockside location and surrounding built environment
 - in particular provide a transition in scale in relation to the lower rise buildings to the south-east and ensure appropriate spacing between buildings to enable visual permeability between Marsh Wall and South Dock, and variation in heights to avoid the creation of a canyon-like effect along Marsh Wall.

- Create a series of building scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall.
- Protect and enhance the setting of the Maritime Greenwich world heritage site and the historic dockside promenade.

Routes and streets

- Create a legible, permeable and well-defined movement network, centred on Millharbour and Marsh Wall. Frequent and public routes connecting South Dock with Marsh Wall should be created and maintained in any redevelopment proposals.
- Improve and enhance walking and cycling connections to, from and within the site, and provide legible and pedestrian friendly connections between and along Marsh Wall and South Quay Walk, particularly from Mastmaker Road to the South Quay footbridge and from Millharbour through a newly proposed footbridge to Upper Bank Street.
- Development must provide public access along the waterfront at South Dock. Improved green grid routes should be delivered along the waterfront at South Dock, and along Byng Street, Manilla Street, and Cuba Street, with good quality onward connections provided to green grid routes towards the Thames Path, Stafford Street, and the site allocations at Millharbour and Marsh Wall West.

Environment and public realm

- Prevent excessive overshadowing of the dockside and enable activation of the waterfront by ensuring development is stepped back from the water, and consider the operational needs of boat operators.
- The pedestrian environment along Marsh Wall axis is currently restrictive. This key street route should be a pedestrian friendly environment. Existing and new routes between the Marsh Wall axis and South Dock should be designed primarily for pedestrians and incorporate landscape and SUDs feature.
- Create open spaces around the DLR that should be well defined by public green space or public squares and active building frontages. Open space is in short supply in this location – with views across the dock basin provide the sense of openness. The public routes and spaces alongside the edges of South Dock should be generous.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use should be investigated.

4.7 Millharbour

Figure 49: 4.7 Millharbour (indicative)



Site information	Details
Address	Marsh Wall/Millharbour
Area [ha]	3.95
Ward	Canary Wharf
PTAL [2031]	2-4
Planning designations Page 504	<ul style="list-style-type: none"> ● Critical Drainage Area (part of the site) ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Town Centre (South Quay Neighbourhood Centre) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)

Site information	Details
Relevant Permissions	PA/14/03195 - Building G1, a podium with two towers of 10 - 38 storeys and of 12 - 44 storeys; Building G2, a four floor podium with two towers of 34 and 38 storeys inclusive of podium; Building G3, a tower rising to 44 storeys; and Building G4, a four floor podium with a tower of 31 storeys inclusive of podium. The development provides 1,513 new homes in a mix of units and tenures; a new primary school with nursery facilities; further education uses; 5,820 sqm of flexible commercial floorspace; two new public parks including play facilities.

Site proposal	Details
Indicative capacities	1,700 homes 6,000sqm non-residential floorspace 3,500sqm educational floorspace
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of workspace and community uses, including provision of a primary and secondary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school
 - Reprovision and expansion of existing alternative secondary school
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

Form, massing, and heritage

- Height Strategy: Appropriate height of 146m at tallest points, which should be at the northern and eastern edges of the site. Other taller buildings of 131m and 117m in the north, and 125m in the east.
- Development should respond positively to the local character of the surrounding built environment and its dockside location, and should step down from Marsh Wall to the smaller-scale residential areas south of Millwall Dock.
- Protect and enhance the setting of the Maritime Greenwich world heritage site and the historic dockside promenade.

Routes and streets

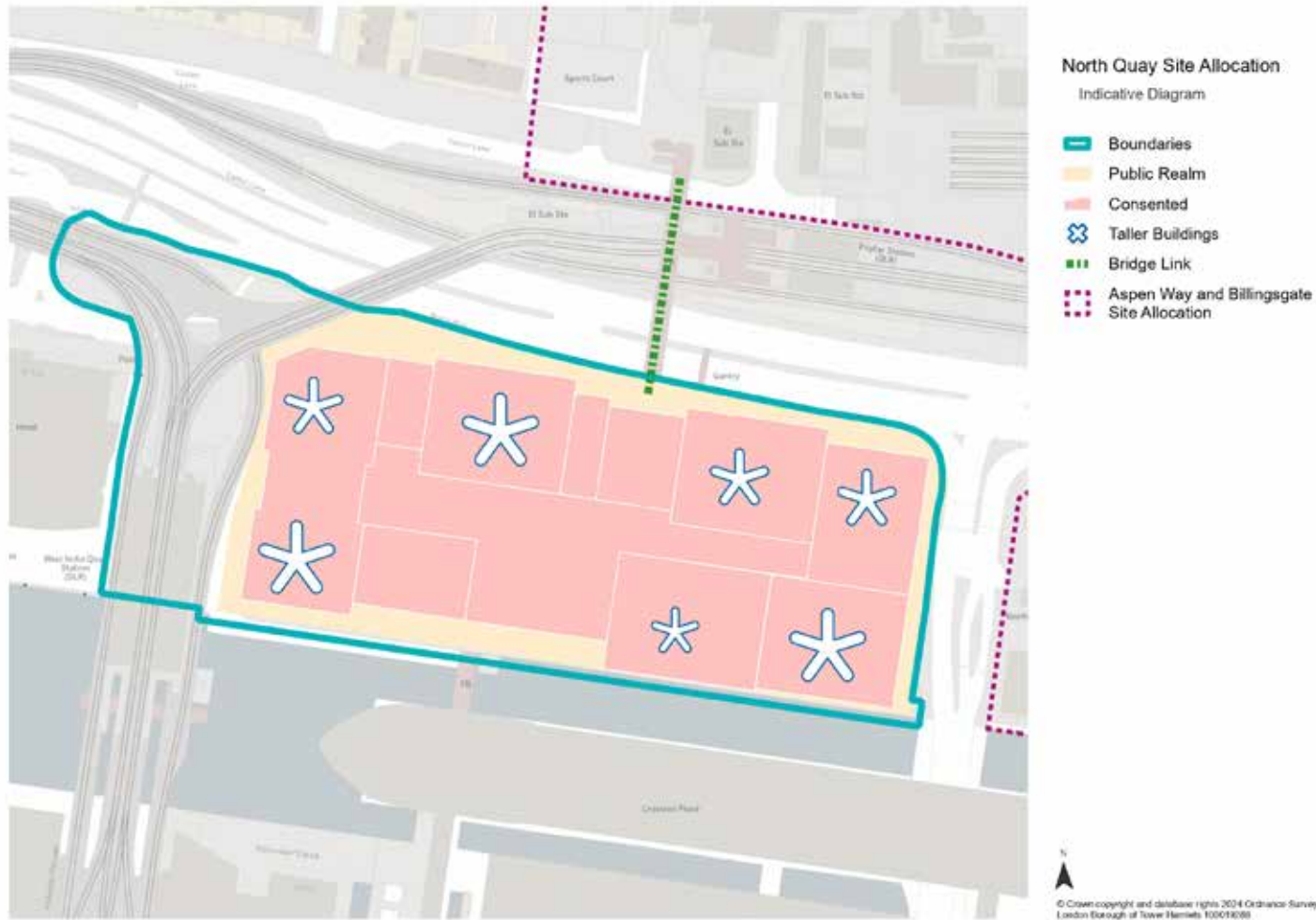
- Create a legible, permeable and well-defined movement network, centred on Millwall Inner Dock, Millharbour and Marsh Wall.
- Improve and enhance walking and cycling connections to, from and within the site, and provide legible and pedestrian friendly connections between Marsh Wall and South Quay Walk, particularly from Mastmaker Road to the South Quay footbridge and from Millharbour through the proposed footbridge to Upper Bank Street. Development must provide public access along the waterfront at Millwall Inner Dock. Improved green grid routes should be delivered along Marsh Wall, Millharbour, and along the waterfront at Millwall Inner Dock, with good quality onward connections to green grid routes through the Marsh Wall West site allocation.

Environment and public realm

- Incorporate active frontages to surrounding streets and spaces (including the waterside) and accessible, high quality public space along the entire dockside.
- Create a positive sense of place with an arrival point in the form of an active square at the corner of South Quay footbridge and Marsh Wall/ Mastmaker Road.
- Prevent excessive overshadowing and enable activation of the dockside by ensuring development is stepped back from the waterside.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use should be investigated.

4.8 North Quay

Figure 50: 4.8 North Quay (indicative)



Site information	Details
Address	Upper Bank Street
Area [ha]	2.87
Ward	Canary Wharf
PTAL [2031]	5-6a
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Skyline of Strategic Importance ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Town Centre (Canary Wharf Metropolitan Centre) ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Statutory listed buildings (Quay Walls, Copings and Buttresses to Import Dock and Export Dock, Grade I)

Site information	Details
Relevant Permissions	PA/20/01421 – Application for outline planning permission (all matters reserved) for the redevelopment of the North Quay site for mixed use comprising: Demolition of existing buildings and structures; Erection of buildings and construction of basements; The following uses: - Business floorspace – Hotel/ Serviced Apartments – Residential – Co-Living.

Site proposal	Details
Indicative capacities	Up to 1,250 homes At least 160,000sqm non-residential uses
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use scheme with elements of residential and employment floorspace.
- Acceptable land uses include:
 - Residential (Class C3) – maximum of 75% of floorspace
 - Town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Improved pedestrian crossing over Aspen Way
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.

- Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD. This has been developed between landowners and the council in order to positively address the social, economic and environmental disparities between Poplar and Canary Wharf.

Form, massing, and heritage

- Height strategy: The tallest point should be at the southwest corner of the site.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Address the barrier of Aspen Way and integrate the site with Poplar High Street to the north, and the Canary Wharf Elizabeth line station and the Canary Wharf estate to the south. These routes should align with the existing urban grain to support permeability and legibility.
- Improve walking and cycling connections to and from the site, accommodating a new east-to-west pedestrian route through the site which facilitates connections to the wider movement network and the DLR and underground stations adjoining the site. Improve strategic links from Canary Wharf to Poplar High Street through the provision of enhanced north-south links.

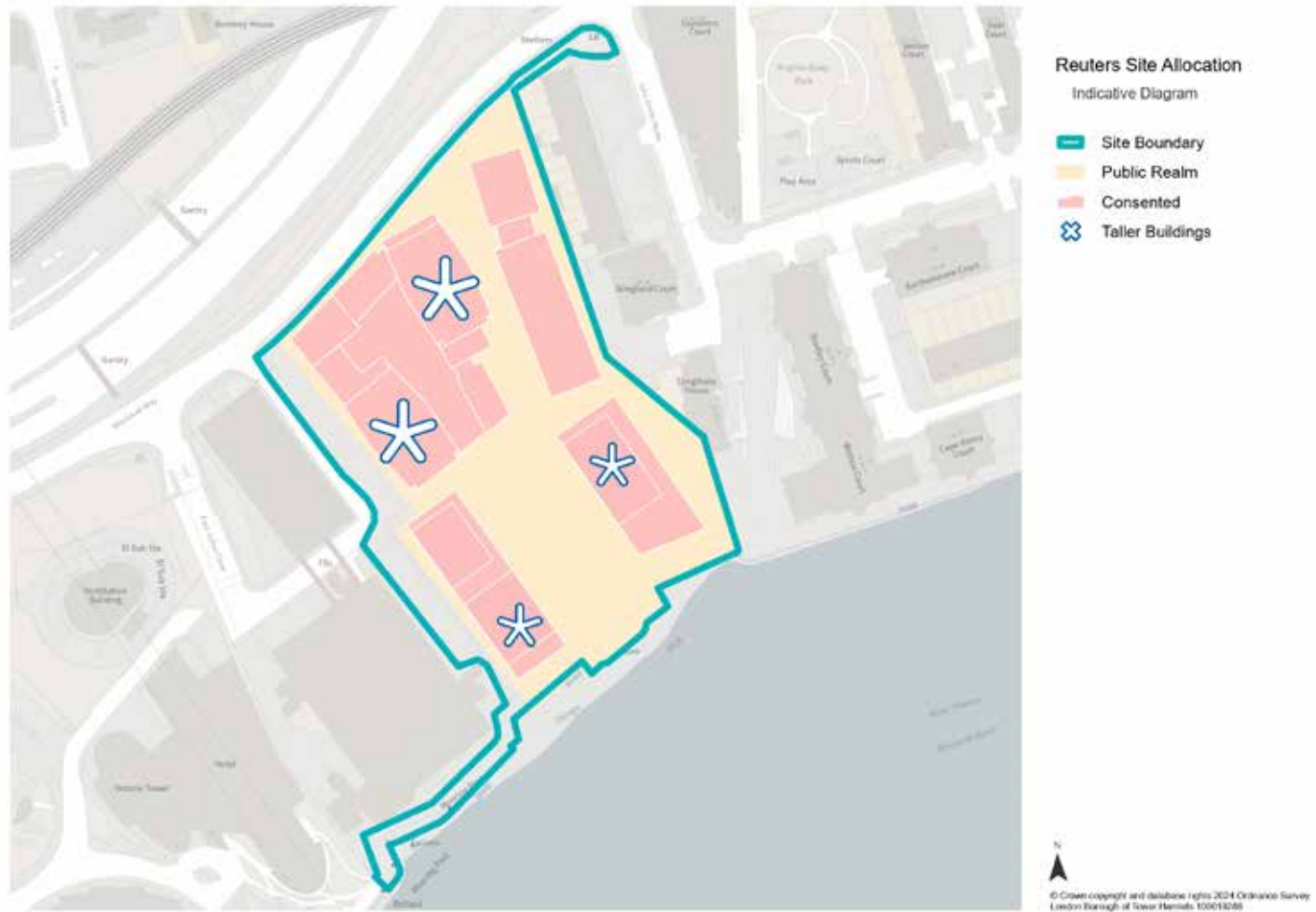
- Development must provide public access along the waterfront at North Quay. Improved green grid connections should be delivered through the site and along the waterfront at North Dock, with good quality onward connections to green grid routes at the West India Docks and Hertsmere Road, and connecting to the Aspen Way and Billingsgate Market site allocations.

Environment and public realm

- Create a positive sense of place through the delivery of an active public square connecting the Canary Wharf Elizabeth line station and the dockside promenade to Poplar DLR station and Poplar High Street.
- Across the South Poplar Masterplan area, development should coordinate to manage surface water to enable discharge into the docks to the south.

4.9 Reuters

Figure 51: 4.9 Reuters (indicative)



Site information	Details
Address	Paul Julius Close
Area [ha]	1.72
Ward	Blackwall and Cubitt Town
PTAL [2031]	2-5
Planning designations Page 510	<ul style="list-style-type: none"> ● Area of substandard air quality ● Thames Policy Area ● Flood risk area ● Site of Importance for Nature Conservation (River Thames and Tidal Tributaries, adjacent to the site) ● Tall Building Zone (Blackwall) ● Archaeological Priority Area (Blackwall, tier 2) ● Statutory listed buildings (Dry Dock at Blackwall Engineering, Grade II)
Relevant Permissions	<p>PA/20/02509 – Phased redevelopment of the site and construction of 5 buildings (with maximum heights of between 9 and 39 storeys) comprising residential dwellings of mixed tenure, primary school & nursery, commercial, business & service floorspace.</p> <p>PA/21/00288 – Full planning permission for a riverboat station, jetty and associated works at Blackwall Yard.</p>

Site proposal	Details
Indicative capacities	900 homes 2,250sqm commercial uses and public house
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a residential-led scheme with provision of a primary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school
- Development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.

Form, massing, and heritage

- Height strategy: The tallest buildings should be located at the northern side of the site. Heights should step down towards the river.
- Buildings should enable visual permeability between Blackwall Way and the River Thames.
- The impact of development on nearby heritage assets should be

considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

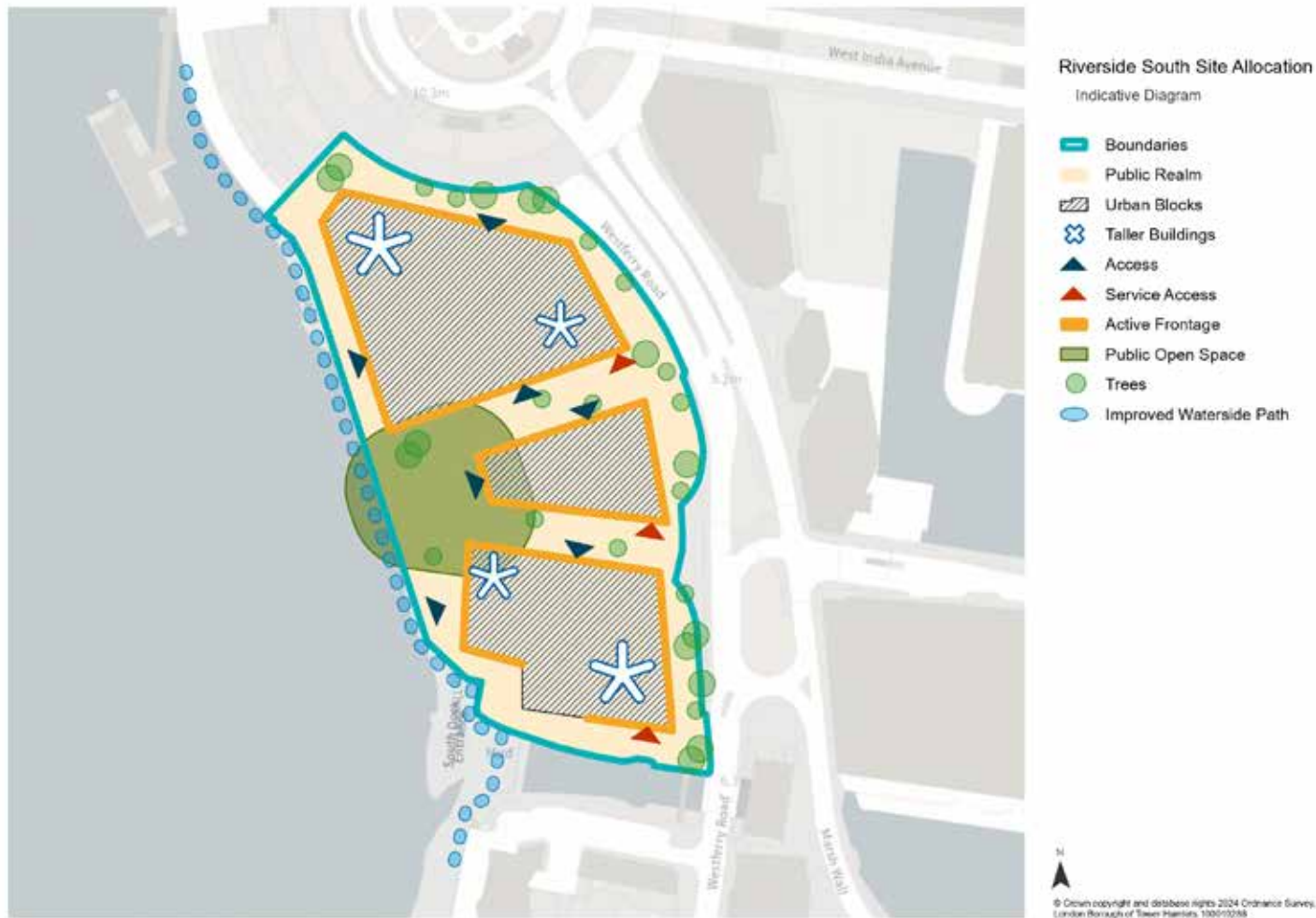
- Height strategy: Appropriate heights of 139m and 117m on the two tallest buildings, which should be located at the northern side of the site. Heights should step down towards the river.
- Improve walking and cycling connections to, from and within the site, to address the connections to adjacent sites and create a legible, permeable and well-defined movement network. A continuous pedestrian and cycle link along the Thames Path should be provided.
- Development must provide public access along the waterfront at the River Thames. Improved green grid connections should be delivered along Blackwall Way and the River Thames waterfront, with good quality onward connections to adjoining green grid routes, such as the route over Aspen Way towards Naval Row.
- Development on this site will be accompanied by delivery of a new riverbus station, to improve access to the area.

Environment and public realm

- Development should create a positive sense of place with an arrival point in the form of an active public square at the corner of Blackwall Way, through Blackwall Yard to the Thames waterfront.
- Reinforce and complement local distinctiveness with the re-provision of the existing waterspace on site and integrate its function with the open space to maximise amenity provision.
- Respect the waterside setting, ensuring public accessibility to the waterfront by stepping buildings back from the water and ensuring active frontages along the water's edge.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, development on this site should provide an outfall for surface water drainage into the River Thames.

4.10 Riverside South

Figure 52: 4.10 Riverside South (indicative)



Site information	Details
Address	Westferry Circus
Area [ha]	2.17
Ward	Canary Wharf
PTAL [2031]	5-6a
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (part of the site) ● Skyline of Strategic Importance ● Thames Policy Area ● Flood risk area ● Area of deficiency of access to nature ● Town Centre (Canary Wharf Metropolitan Centre) ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Statutory listed buildings (Former West Entrance Lock to South Dock, Grade II)
Relevant Permissions	PA/08/02249 - Erection of office buildings (341,924sqm) comprising two towers (max 241.1m and 191.34m) with a lower central link building (80.05m) together with ancillary parking service and access roads, public open space and riverside walkway, landscaping including public art and other ancillary works. Stalled permission.

Site proposal	Details
Indicative capacities	1,650 homes 56,000sqm commercial floorspace
Phasing	2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use scheme with elements of residential and employment floorspace.
- Acceptable land uses include:
 - Residential (Class C3) – maximum of 75% of floorspace
 - Town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community centre
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.
- Development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
- Development should not prejudice the potential delivery of a river crossing across the Thames.
- The site has lain dormant for some time, and temporary meanwhile

uses will be encouraged on this site while plans for a more permanent development are prepared. This could include using the site for open space, employment and commercial uses, or temporary residential accommodation.

- Delivery on this site will need to consider the operational requirements of the West India Dock entrance and impounding station, particularly with regards to the delivery of the improved riverside path.

Form, massing, and heritage

- Height strategy: The tallest point should be to the south of the site, adjacent to Westferry Road. Secondary point of significant height opposite this in the north of the site. Heights should step down significantly from these tall points.
- The site should be subdivided to create at least three urban blocks with public routes between them, and should deliver variety and distinction in the heights of new buildings across the site to ensure visual permeability between Westferry Road and the River Thames.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. Development should enhance the listed lock wall and lock entrance that forms the southern boundary of the site. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site - particularly to address connections to Westferry Circus, Westferry Road and the River Thames, to create a legible, permeable and well-defined movement network. East-west connections should be created across the site, extending the axis of Bank Street, and providing at least one other east-west route. Reinstatement of the active street frontage and pedestrian route along Westferry Circus and Westferry Road, with strong visual and activity links to the riverside amenity. Improved green grid routes should be delivered along the River Thames waterfront, with good quality onward connections to the rest of the Thames Path.
- A continuous waterside route for pedestrians and cyclists should be maintained on the western perimeter of the site along the River Thames, ensuring easy public access along the entire waterfront with active retail and commercial uses.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

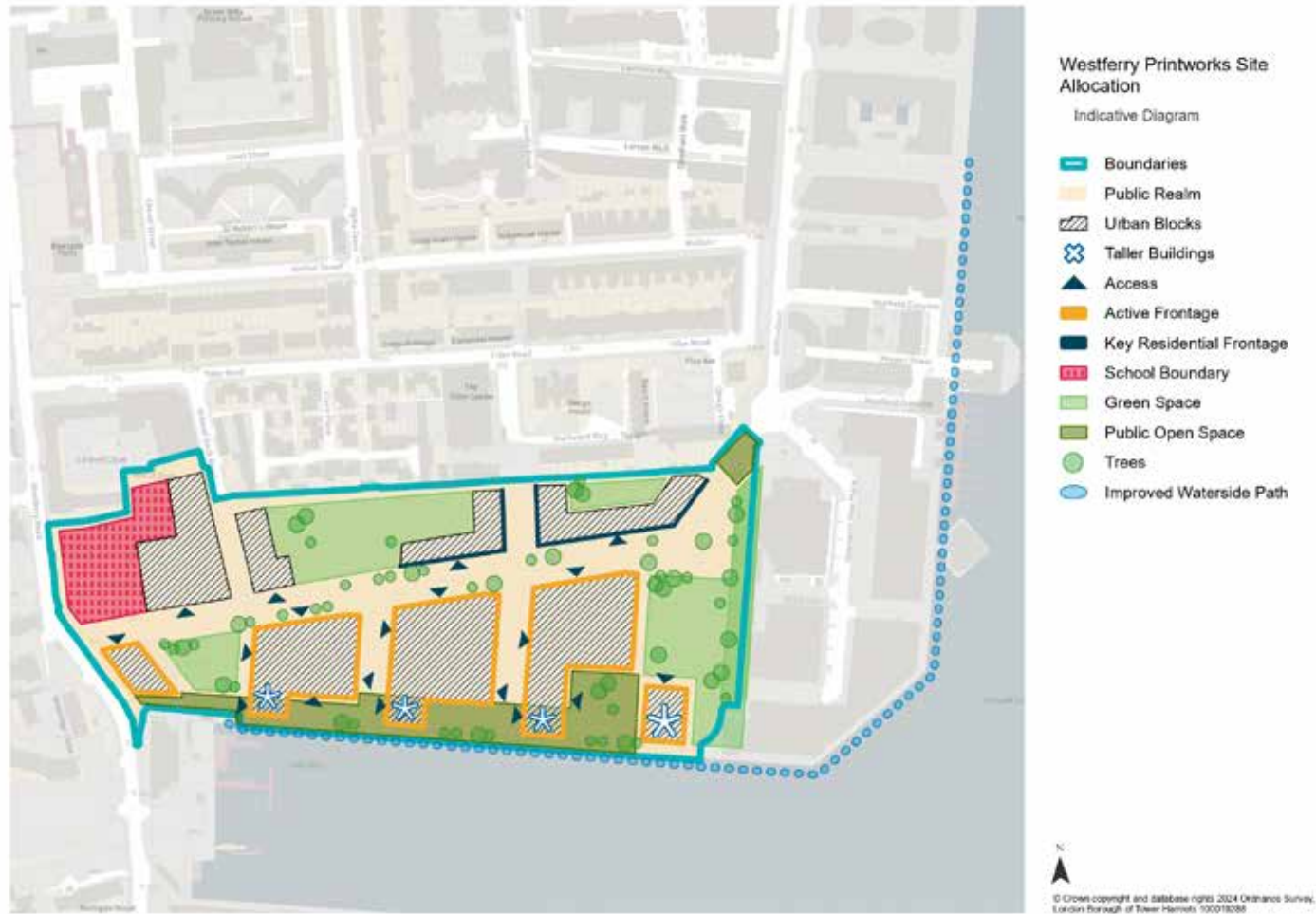
- A major riverside public space should be created at the centre of the site. This space should join all routes and urban blocks together and provide a direct connection to the River Thames. Provide green open space along the River Thames which is activated with commercial uses and expands on the leisure activity hub at Westferry Circus.

- Respect the waterside setting, ensuring public accessibility to the waterfront by stepping buildings back from the water and ensuring active frontages along the water's edge.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, development on this site should provide an outfall for surface water drainage into the River Thames.

4.11 Westferry Printworks

Figure 53: 4.11 Westferry Printworks (indicative)

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Site information	Details
Address	Westferry Road
Area [ha]	6.21
Ward	Canary Wharf
PTAL [2031]	1b-2
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Critical Drainage Area (part of the site) ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)
Relevant Permissions	PA/15/02216 – Comprehensive mixed use redevelopment including buildings ranging from 4- 30 storeys in height (tallest being 110m) comprising: a secondary school, 722 residential units, retail use, flexible restaurant and café and drinking establishment uses, flexible office and financial and professional services uses, Community uses.

Site proposal	Details
Indicative capacities	950 homes 14,500sqm educational floorspace 2,000sqm commercial floorspace 4,000sqm community floorspace 1,500sqm retail floorspace
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a residential-led scheme with provision of a secondary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Secondary School
 - Community centre
 - Strategic consolidated open space of minimum 1 hectare
- Public open space should be located adjacent to the Millwall Outer Dock and designed to facilitate sport and recreation activities.
- An assessment should be carried out to understand the potential contamination on site prior to any development taking place.

Form, massing, and heritage

- Height strategy: Appropriate height of 110m at the tallest point, which should be at the eastern end of the site. Heights should step down towards the existing lower-rise context in the west.
- Development should enable clear lines of sight between Millharbour and Millwall Outer Dock and ensure multiple visual and pedestrian permeability between Tiller Road and Millwall Outer Dock.
- Protect or enhance the setting of the Maritime Greenwich world heritage site.

Routes and streets

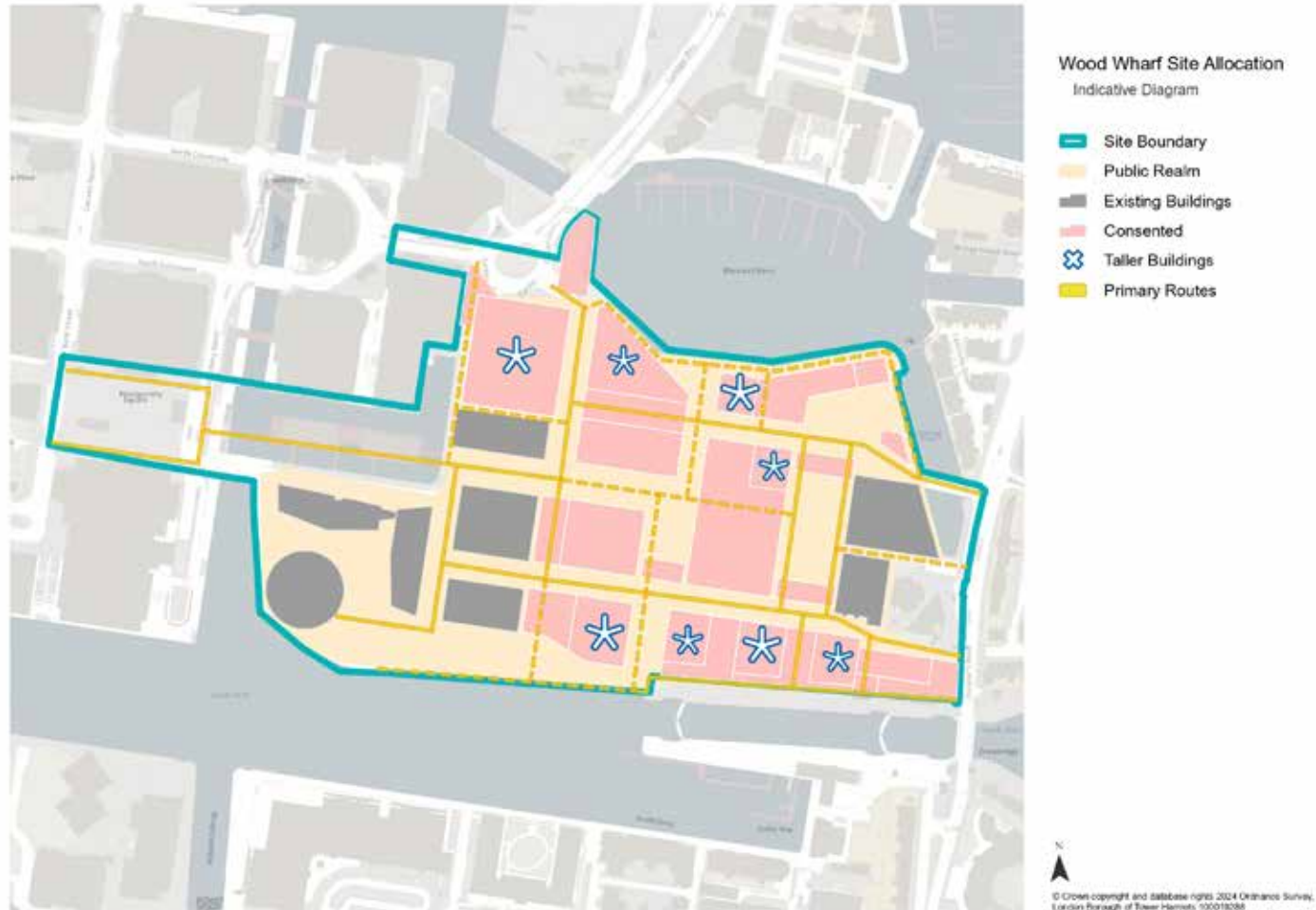
- Improve walking and cycling connections to, from and within the site - particularly to improve connections to Millwall Outer Dock and to Barkantine Estate centre, Westferry Road centre and Crossharbour centre. These routes should align with the existing urban grain to create a legible, permeable and well-defined movement network. Development must provide access along the waterfront at Millwall Outer Dock. Improved green grid routes should be provided along the waterfront at Millwall Outer Dock, with good quality onward connections to green grid routes at Tiller Road and towards the Thames Path.
- New development should be well connected to the existing leisure centre at Tiller Road.

Environment and public realm

- Improve public realm with active site edges, particularly along Westferry Road and Millharbour.
- Respect the waterside setting, ensuring public accessibility to the waterfront by stepping buildings back from the water.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, development on this site should provide an outfall for surface water drainage into the docks.

4.12 Wood Wharf

Figure 54: 4.12 Wood Wharf (indicative)



Site information	Details
Address	Preston's Road
Area [ha]	11.03
Ward	Blackwall and Cubitt Town
PTAL [2031]	3-6a
Planning designations Page 520	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Skyline of Strategic Importance ● Flood risk area ● Site of Importance for Nature Conservation (Millwall and West India Docks, and Blackwall Basin, both adjacent to the site) ● Town Centre (Canary Wharf Metropolitan Centre) ● Tower Hamlets Activity Area (part of the site) ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Conservation Area (Coldharbour, part of site, most of the Conservation Area is adjacent to the site) ● Statutory listed buildings (Quay Walls, Copings and Buttresses to Import Dock and Export Dock, Grade I; Blackwall Basin, Grade I)

Site information	Details
Relevant Permissions	PA/13/02966 - Outline application (all matters reserved) for mixed-use redevelopment of the site, comprising the erection of buildings, including tall buildings and basements, comprising residential units, hotel, business floorspace, retail, community and leisure, and sui generis uses. The permission also includes a night club/ jazz club in the basement levels of plot C1. As amended.

Site proposal	Details
Indicative capacities	3,600 homes 165-265,000sqm of commercial floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the provision of a primary school and health facility and an expansion of the Idea Store.
- Acceptable land uses include:
 - Residential (Class C3) – maximum 75% of floorspace
 - Hotel (Class C1)
 - Town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school

- NHS primary health care facility (already delivered and operational)
- Idea Store (or expansion or relocation of existing Canary Wharf Idea Store)
- Strategic consolidated open space of minimum 1 hectare
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.

Form, massing, and heritage

- Height strategy: The tallest point should be located in the southwest corner of the site. Heights should step down towards the existing residential towards the east of the site.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes protecting or enhancing the Blackwall Basin and former West India Dock walls. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

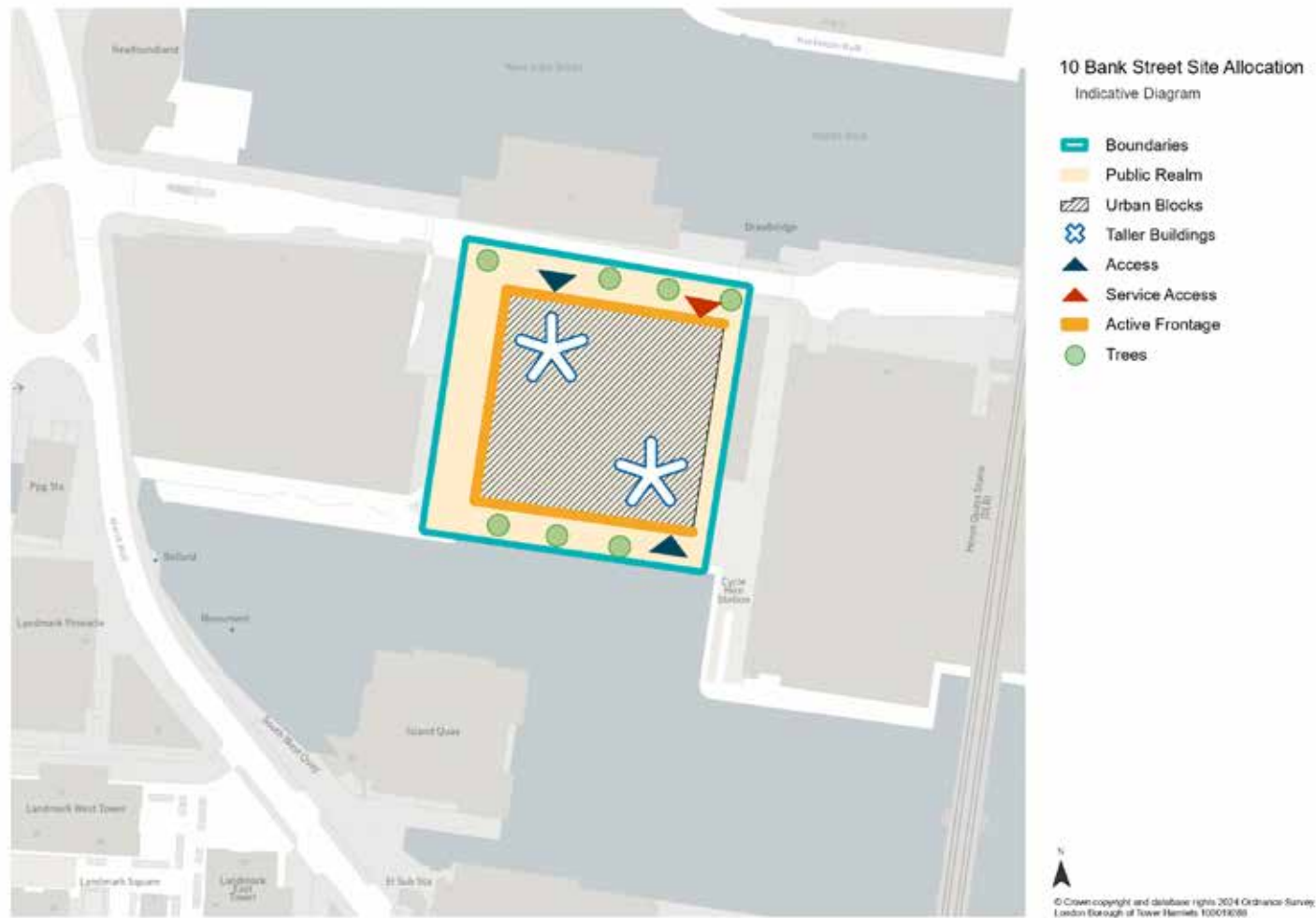
- Create new east-west and north-south walking and cycling routes. These should align with the existing grid geometry of Canary Wharf to create a legible, permeable and well-defined movement network, particularly connecting to Canary Wharf and Marsh Wall East. Development must provide access along the waterfront at Blackwall Basin and South Dock, and provide comfortable access to these spaces. Improved green grid connections should be delivered through the site, with good quality onward connections to green grid routes at Preston's Road and towards Jubilee Park and the Billingsgate Market site allocation.

Environment and public realm

- Prevent excessive overshadowing and enable activation of the riverside by ensuring buildings are stepped back from the water edge.
- Provide a range of new publicly accessible open spaces, including a consolidated open space of at least 1 hectare in size.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater recycling should be investigated.

4.13 10 Bank Street

Figure 55: 4.13 10 Bank Street (indicative)



Site information	Details
Address	Bank Street
Area [ha]	0.66
Ward	Canary Wharf
PTAL [2031]	6a
Planning designations	<ul style="list-style-type: none"> ● Skyline of Strategic Importance ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Town Centre (Canary Wharf Metropolitan Centre) ● Tower Hamlets Activity Area ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3)

Site information	Details
Relevant Permissions	<p>PA/13/01150 - Outline application (all matters reserved) for the demolition of existing buildings and structures and erection of a new building with a maximum height of 191.5m AOD comprising a maximum of 129,857sqm GIA of office floorspace and a maximum of 785 sqm GIA of flexible floorspace (A classes) along with a decked promenade to the South Dock, access and highways works, landscaping and other associated works. (Development not completed)</p> <p>PA/16/02956 - Construction of a building 166m AOD comprising 124,734sqm GIA of office (Use Class B1) and 293sqm GIA of retail (Use Classes A1-A5) along with a decked promenade to the West India Dock South.</p>

Site proposal	Details
Indicative capacities	575 homes 41,000sqm commercial/town centres floorspace
Phasing	2025-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential- and commercial-led scheme.
- Acceptable land uses include:
 - Residential (Class C3) – maximum 75% of floorspace
 - Commercial and town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.

Form, massing, and heritage

- Height strategy: The tallest point should be located in the southeastern corner of the site.
- The towers should be carefully designed with respect to overlooking, given the close proximity of this plot to adjacent developments.

Routes and streets

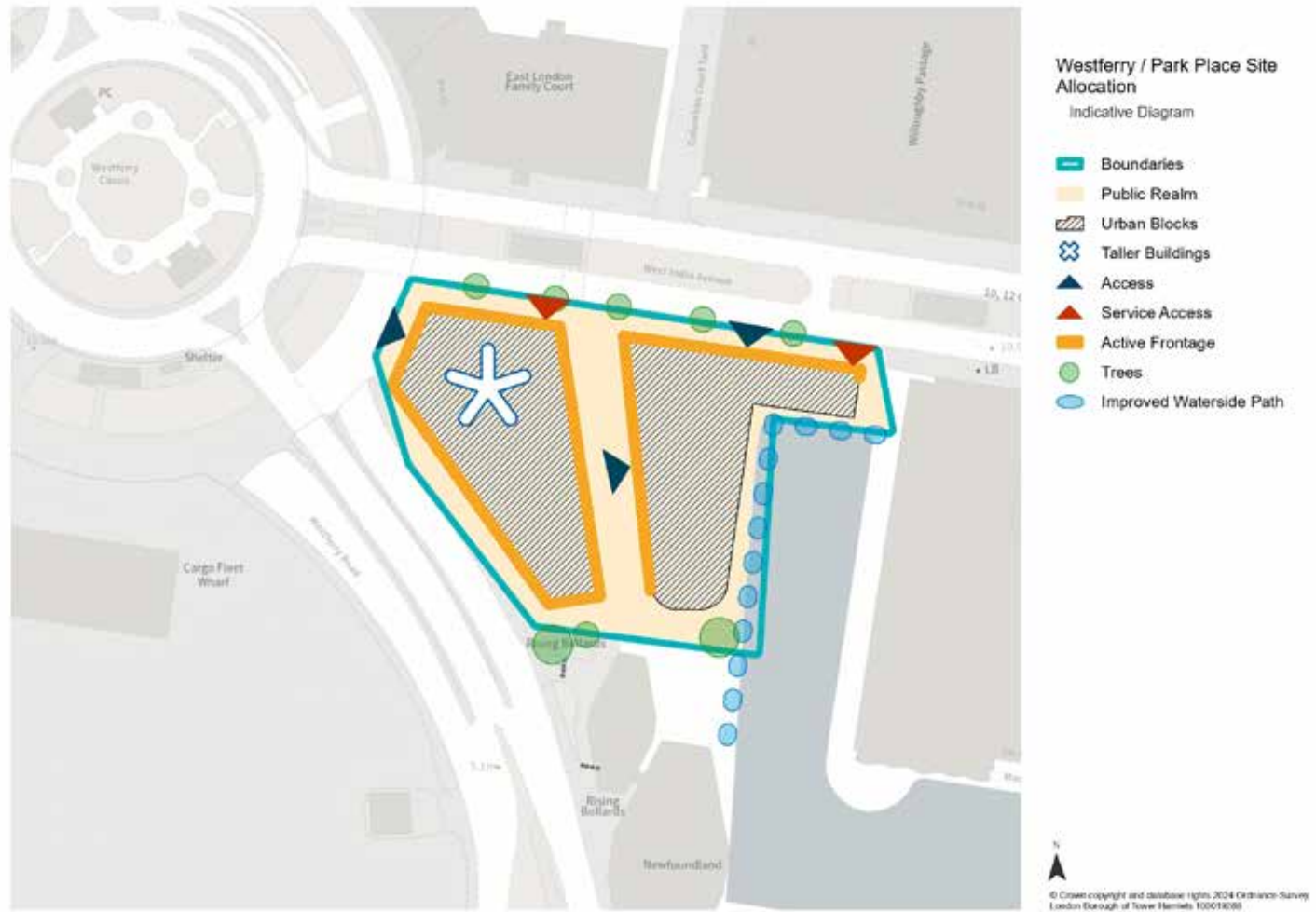
- Improve walking and cycling connections to and from the site, and provide public access to the waterfront at South Dock. Public routes on the east and west sides of the block should also be created, to establish public and accessible routes between Middle and South Docks.

Environment and public realm

- Prevent excessive overshadowing and enable activation of the riverside by ensuring buildings are stepped back from the water edge.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, development on this site should provide an outfall for surface water drainage into the docks.
- Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site should therefore aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm.

4.16 Westferry / Park Place

Figure 56: 4.16 Westferry / Park Place (indicative)



Site information	Details
Address	West Ferry Road/West India Avenue
Area [ha]	0.68
Ward	Canary Wharf
PTAL [2031]	6a
Planning designations Page 526	<ul style="list-style-type: none"> ● Area of substandard air quality ● Skyline of Strategic Importance ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Town Centre (Canary Wharf Metropolitan Centre) ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Statutory listed buildings (Quay Walls, Copings and Buttresses to Import Dock and Export Dock, Grade I)

Site information	Details
Relevant Permissions	<p>PA/13/02344: Outline application for the demolition of any existing structures, and construction of a building of up to 102,102sqm GIA comprising office use (use class B1) along with a decked terrace to the Middle Dock.</p> <p>PA/13/02341/A2: Reserved matters application for the erection of an office building (Use Class B1) comprising two basement levels, lower and ground level and 31 upper levels, construction of a new pedestrian link and other works incidental to the development.</p> <p>PA/16/02363/S: Minor-material amendment to outline planning permission PA/13/02344.</p> <p>PA/20/00125/NC: Application for a Certificate of Lawfulness of Existing Use or Development in relation to the implementation of outline planning permission (ref. PA/16/02363/S) and reserved matters application (ref. PA/13/02341/A2).</p>

Site proposal	Details
Indicative capacities	550 homes 19,000sqm commercial/town centre floorspace
Phasing	2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential- and commercial-led scheme.
- Acceptable land uses include:
 - Residential (Class C3) – maximum 75% of floorspace
 - Commercial and town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.

Form, massing, and heritage

- Height Strategy: The tallest point should be located in the west of the site, fronting Westferry Circus. Heights to step down to the east and south.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to and from the site, and provide public access to the waterfront at Middle Dock.

Environment and public realm

- High quality public realm and open spaces should be created between the buildings in the new development, and at the frontage with Middle Dock.
- The street frontage will need to carefully manage level changes on the Westferry Road frontage, where the road passes beneath Westferry Circus and the pedestrian routes rise to meet West India Avenue, and should create an improved pedestrian experience, with wide pavements to create space for pedestrians.
- Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site should therefore aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm.



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Appendices

Appendix 1: Glossary

Term	Abbreviation	Explanation
Active cooling		A heat-reducing mechanism that ensures heat transfer to cool a building. Active cooling is dependent on energy consumption to operate. Examples of active cooling include air conditioning systems.
Active frontages		A building front that promotes activity and natural surveillance, and encourages movement between the building at ground level and the adjacent public realm by the way the building is designed or orientated. A building provides active frontage if the ground floor avoids blank walls or obscured frontages, includes windows and openings, and provides a variety of uses, all of which contribute to natural surveillance and support the visual and physical relationship between the building and ground level.
Affordable housing		Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and our (the council) housing allocation policy. Affordable housing should include provisions to remain at an affordable price for future households or for the subsidy to be recycled for alternative affordable housing provision.
Affordable workspace		Workspace that is provided at rents below the market rate for that space for a specific social, cultural or economic development purpose. The space may be rented directly to the council or to an approved affordable workspace provider.
Agent of Change Principle		The principle places the responsibility of any new development (i.e. the agent of change) to mitigate the impact of nuisances (including noise) from existing nuisance-generating uses. This is to ensure that occupants in the new development are protected from adverse impacts and existing uses are protected from complaints. Similarly, any new nuisance-generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.
Air Quality Assessment	AQA	An assessment of the impact of a development on levels of certain pollutants in the local area

Term	Abbreviation	Explanation
Air Quality Neutral		An Air Quality Neutral development is one that meets, or improves upon, the benchmarks set out in the Air Quality Neutral LPG. These benchmarks set out the maximum allowable emissions of NOx and particulate matter based on the size and use class of the proposed development, and are designed to prevent the degradation of air quality from the combined emissions of individual developments. Air Quality Neutral applies only to the completed development and does not include impacts arising from construction, which should be separately assessed in the Air Quality Assessment.
Air Quality Objectives		Objectives are expressed as pollution concentrations over certain exposure periods, which should be achieved by a specific target date. Some objectives are based on long term exposure (e.g. annual averages), with some based on short term objectives. Objectives only apply where a member of the public may be exposed to pollution over the relevant averaging time.
Air Quality Positive approach		A process of identifying and implementing ways to push a development beyond compliance with both the Air Quality Neutral benchmarks and the minimum requirements of an air quality assessment. To achieve this, an AQP Statement should be submitted that demonstrates how benefits to local air quality have been maximised, and how measures to minimise pollution exposure will be implemented.
Amenity		A quality of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.
Amenity space		An area within the curtilage of a residential development that is used for recreation and provides visual amenity, e.g. gardens or landscaped space. This includes both 'private' and 'communal' amenity space.
Annual monitoring report	AMR	Assesses the effectiveness of our policies and proposals.
Areas of deficiency in access to nature		Areas where people have to walk more than one kilometre to reach a publicly accessible metropolitan or borough Site of Importance for Nature (SINC).
Areas of deficiency in access to public open space		Areas lacking in sufficient publicly accessible open space, as defined by the distances set out in London Plan policy G4 Open space.

Term	Abbreviation	Explanation
Archaeological Priority Area		A defined area where there is significant known archaeological interest which might be affected by development. These areas have been categorised into three tiers according to their relative archaeological significance and potential - Tier 1: Area which is known or strongly suspected to contain a heritage asset of national importance (e.g. scheduled monument). Tier 2: Area where there is known presence or likely presence of heritage assets of archaeological interest. Tier 3: Area with archaeological potential.
Biodiversity Net Gain	BNG	Biodiversity net gain (BNG) is a strategy to develop land in a manner that contributes to the recovery of nature and leaves the natural environment in a measurably better state than it was beforehand. Biodiversity net gain delivers quantifiable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity refers to all living organisms, including animals, insects, plants, bacteria, and fungi. A habitat is the area and resources used by a living organism or assemblage of animals and plants. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures.
Blue Badge parking		Parking available to holders of Blue Badges (permits issued by the local authority entitling holders to park on the public highway in marked bays or on yellow lines.
Business Improvement District	BID	A business-led mechanism for increasing investment within defined areas of a city such as a town centre, based on a supplementary rate levied on businesses within the defined area.
Build to Rent	BTR	Schemes which meet the definition set out in Policy H11 Build to Rent of the London Plan
Building Research Establishment Environmental Assessment Method	BREEAM	A widely used method to assess the sustainability of non-residential developments.
Canary Wharf Fringe		An area of transition between the Canary Wharf Preferred Office Location and the surrounding residential communities. This area has a mix of office uses and residential.

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Term	Abbreviation	Explanation
Car-free development		Car-free developments do not provide parking for cars on-site and there is no entitlement to on-street parking permits for residents, with the exception of providing accessible parking spaces for Blue Badge holders.
Central Activities Zone	CAZ	A large area covering Central London and including parts of the boroughs of Camden, Hackney, Islington, Kensington and Chelsea, Lambeth, Southwark, Wandsworth and Westminster, in addition to Tower Hamlets. This area is the traditional commercial and cultural centre of London, with a high concentration of office, shopping, leisure and cultural facilities. Within Tower Hamlets, the CAZ includes the City Fringe and the North Isle of Dogs.
CAZ Centres		Clusters within the Central Activities Zone (CAZ) that are predominantly retail or leisure focused and act as town centres.
Circular economy		An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.
Code of Construction Practice	CoCP	A guidance document setting out relevant legislation, linkages to the Local Plan, key actions to be undertaken by developers (regarding planning submissions and license applications) and encouraging the use of best practice environmental and safety related mitigations while planning and managing demolition and construction works within the borough.
Community facilities		For the purposes of this Local Plan, community facilities can include: public houses, libraries, youth facilities, meeting places, places of worship, public conveniences and other uses in use classes E(d-f), F1, F2(b and d) and Sui Generis that provide a service to the local community.
Community infrastructure levy	CIL	A tariff on development which creates net additional floor space, where the gross internal area of new build exceeds 100 square metres, to help fund new infrastructure required to support the development.

Term	Abbreviation	Explanation
Community-led housing		Schemes that are genuinely community-led all share three common principles: meaningful community engagement and consent occurs throughout the development process (communities do not necessarily have to initiate the conversation, or build homes themselves); there is a presumption that the community group or organisation will take a long-term formal role in the ownership, stewardship or management of the homes; and the benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.
Communal heating systems		A system that supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.
Comparison shopping		Retail goods not bought on a frequent basis, and that may involve comparison shopping or visits to more specialised shopping locations, such as clothes, televisions, fridges and dishwashers etc.
Connectivity		This refers to the number of connections within a street network and their integration, layout and relationship to one another and the impact this has on getting from A to B, by foot, bicycle and vehicle.
Conservation area		An area of special architectural or historical interest, the character and appearance of which the council has a duty to preserve or enhance. The land, buildings and trees in these areas have special protection in the planning system.
Construction, demolition and excavation waste		This is waste arising from the excavation, construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.
Construction logistics and community safety standard	CLOCS	The CLOGS standard is a common standard for use by the construction logistics industry to ensure that construction companies follow effective practice in the management of their operations, vehicles, drivers and construction sites. Each requirement has been developed to reduce the risk of a collision between heavy goods vehicles in the construction sector and vulnerable road users such as cyclists and pedestrians.
Construction management plan	CMP	The CMP provides a site-specific summary of planned management, monitoring and auditing procedures to ensure compliance with the CoCP.
Convenience shopping		The provision of everyday, essential items, such as food, drink and newspapers. In this type of shopping convenience of location usually takes priority.

Term	Abbreviation	Explanation
Creative Enterprise Zone	CEZ	A Mayor of London initiative to establish clusters of creative production, which provide affordable premises and enterprise-related incentives for artists and creative businesses, pro-culture planning and housing policies and offer career pathways and creative jobs for local communities and young people. Tower Hamlets contains one CEZ: The Hackney Wick and Fish Island CEZ in the east of the borough.
Data Centre		A data centre is a physical facility composed of networked computers and storage that businesses and other organisations use to organise, process, store and disseminate large amounts of data.
Design code		A set of simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area.
Development management		Development management is the term used to include the range of activities and interactions that together transform the 'control of development and the use of land' into a more positive and proactive process in keeping with the ethos of spatial planning and supports local authorities in their role as place shapers.
Development management policies		These policies set out detailed criteria to carefully manage and control development through the planning application process.
Development plan		The borough's development plan is comprised of, the London Plan (produced on behalf of the Mayor of London), the Local Plan (this document), and any Neighbourhood Plans which may come forward. The development plan sets out specific policies to guide the use of land and buildings. These policies will be the starting point for assessing planning applications.
District centre		These designations form part of the borough's network of town centres, providing commercial and retail services to predominately serve local communities. They typically have at least one supermarket and a variety of non-retail functions (including community facilities) and are close to the strategic transport network.
District heating network	DHN	A network of pipes carrying hot water or steam, usually underground, that connects heat production equipment with heat customers.
Docklands Light Railway	DLR	An automated, driverless light metro system serving the redeveloped docklands area, including large parts of the borough and adjoining authorities.

Term	Abbreviation	Explanation
Dual aspect		A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. The provision of a bay window does not constitute dual aspect.
Dwelling		A self-contained unit of residential accommodation; also referred to as a 'residential unit'.
Early years		Facilities and services for children of pre-school age (0-4), which include childcare providers, children centres and nurseries.
Easily adaptable		Easily adaptable requires adjustable level kitchen units to be installed to replace the standard units provided; that a level access shower is provided in one bathroom with "wet-room" drainage and that all parts of the dwelling must be suitably sized and that walls are strengthened for the installation of additional mobility aids, as required in the GLA's Housing Supplementary Planning Guidance.
Electric Vehicle Charging Point	EVCP	Also known as a charging station, it is a power supply device that is used to recharge plug-in electric vehicles.
Elizabeth line		A new east-west spinal rail route through central London and beyond
Embodied carbon		In the built environment, 'embodied carbon' emissions refer to the total carbon emissions associated with the construction process, throughout the whole lifecycle of a building. This includes extraction (of raw materials), manufacture, transportation, assembly, replacement, and deconstruction.
Energy Use Intensity	EUI	Energy Use Intensity is a measure of the total energy consumption of a building over a year, per square meter (kWh/m ² /yr). The EUI of a building covers regulated and unregulated energy uses, including space heating, domestic hot water, ventilation, lighting, cooking, and appliances. It does not include charging of electric vehicles.
Employment uses		Offices, industrial and storage and distribution facilities which fall under use classes B2, B8 and E(g), as well as sui generis uses with industrial functions.
Enclosure		Enclosure refers to using 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.

Term	Abbreviation	Explanation
Evening and night-time activities		All uses and activities that take place after 6pm and before 6am. This includes leisure activities such as bars, pubs, restaurants and nightclubs; shops and services that stay open late; and social and physical infrastructure that requires operation and maintenance in the evening and at night, such as hospitals, wholesale markets and public transport.
Family housing		A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms.
Fleet Operator Recognition Scheme Silver accreditation	FORS	The FORS scheme is a voluntary accreditation scheme encompassing all aspects of safety, fuel efficiency, vehicle emissions and improved operations. The FORS silver accreditation is awarded to operators who maintain their bronze accreditation and are able to demonstrate they meet the FORS silver accreditation requirements.
Flood risk zone		Areas within the borough which are at risk from flooding. The flood risk zones consist of zones 1, 2 and 3a and 3b (the higher the number the greater the risk of flooding) and are based on the Environment Agency's flood map for England and Wales.
Gated communities		Walled or fenced housing developments to which public access is restricted, often guarded using CCTV and/or security personnel.
Greater London Authority	GLA	A top-tier administrative body covering the Greater London area. It is comprised of two parts: the London Assembly and the Mayor of London as defined under legislation. The London Assembly scrutinises the activities of the Mayor of London in the public interest.
Green grid		A network of inter-linked high quality and multi-functional open spaces, waterways and other corridors.
Green infrastructure		Green infrastructure is a network of multi-functional green space and other green features. Green infrastructure assets include open spaces such as parks and gardens, allotments, woodlands, fields, hedges, playing fields, footpaths, and cycleways. Assets involving water can also be called 'blue infrastructure', such as rivers, canals, and other water bodies, but these are all included in the overarching term of 'green infrastructure'.

Term	Abbreviation	Explanation
Growth areas		Three different types of character area, as identified in the Characterisation and Growth Study. This defines all areas in the borough as either conserve areas, enhance areas, or transform areas, setting out how new development should respond to the existing character in the area.
Hamlets		This refers to the 24 places (see Figure 5) consisting of historic as well as more recently established places within Tower Hamlets
Habitable room		A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces to be used solely as a kitchen and space such as bath or toilet facilities, corridors, hallways, cellars, utility rooms or similar should not be considered habitable rooms.
Health impact assessment	HIA	Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.
Health facilities		For the purposes of the Local Plan, health facilities can include hospitals, walk-in-centres, doctors surgeries, health and wellbeing centres and community health services.
Healthy Streets		The Healthy Streets Approach is the system of policies and strategies to help Londoners use cars less and walk, cycle and use public transport more. The Healthy Streets Approach uses 10 evidence-based indicators of what makes streets attractive places.
Heritage asset		A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Heritage at Risk Register		An annual survey prepared by Historic England which identifies heritage assets that are considered to be at risk as a result of neglect, decay, or inappropriate development, or are vulnerable to becoming so.
High fat, salt, or sugar products	HFSS	A collection of foods and drinks that are considered to be high in fat, salt or sugar content or to be 'less healthy', as defined under The Food (Promotion and Placement) (England) Regulations 2021.

Term	Abbreviation	Explanation
Historic Environment Record		Information services which provide access to details on historic assets and landscapes covering a defined geographic area, held in an on-line database.
Historic parks and gardens		A collection of designated heritage assets celebrated for their designed landscapes.
Human scale		The size and scale of buildings and structures which relate well in size to an individual human being and are arranged in a way which makes people feel comfortable rather than overwhelmed.
Idea stores		These provide traditional library services as well as additional services including IT facilities and places for socialising as well as access to lifelong learning courses.
Infill development		Development that takes place on vacant or undeveloped sites between other developments and/or built form.
Infrastructure Delivery Plan	IDP	An assessment of the existing and future infrastructure needs and requirements to support new development and the borough's growing population.
Infrastructure Impact Assessment		A short document setting out the expected impact of new development on the infrastructure capacity of the borough, and identifying measures for mitigating this impact.
Integrated Impact Assessment	IIA	As part of developing Tower Hamlet's Local Plan all policies have been subject to an IIA. The IIA comprises: Sustainability Appraisal, Health Impact Assessment, Equalities Impact Assessment and Habitat Regulation Assessment.
Intrusive elements		Elements that are harmful for a designated view, for example through obscuring a landmark or protected skyline, or adversely affecting the prominence of a landmark by scale and/or proximity, including through coalescence and visual dominance.
Intermediate housing		Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent.

Term	Abbreviation	Explanation
Landmarks		A built structure, or group of built structures, that is distinctive because of its appearance or location. It stands out from its surroundings, serving as a reference point for orientation and navigation while having historic or cultural significance.
Legibility		The degree to which a place and the movement routes within and around it can be easily understood by those who inhabit the space.
Leisure facilities		For the purposes of the Local Plan, leisure facilities can include leisure centres, indoor and outdoor sports facilities and swimming pools.
Life sciences		The sciences concerned with the study of living organisms, including biology, botany, zoology, microbiology, physiology, biochemistry, and related subjects. Life sciences facilities typically include wet lab and/or dry lab space in addition to supporting offices and other spaces.
Listed building		A building designated for protection due to its heritage value. Listed buildings are categorised into three tiers - Grade I (highest), Grade II*, and Grade II.
Living building' elements		Living building' elements contribute to local biodiversity through providing habitats, and/or features for priority species. They include living roofs, walls, terraces, and other building greening techniques, and swift bricks or nest boxes. 'Living building' elements can also extend to construction materials that are made of organic materials, which often support thermal control, rainwater flow, can in some cases adapt and self-repair, and are typically more sustainable, resilient, and long-lasting than traditional building materials.
Local Development Scheme	LDS	A project plan setting out how the Local Plan and other relevant documents (e.g. supplementary planning documents) will be prepared and when.
Local Mixed-use Employment Location	LMEL	LELs have unique individual characteristics. They are areas of high accessibility that provide or could provide significant capacity for employment accommodation meeting secondary, more local or specialist employment needs, and to support the needs of start-ups, small-and-medium enterprises and creative and digital industries.
Local Industrial Location	LIL	An area or site identified as being important to local employment and required for the reservoir of industrial employment land, to be safeguarded for industrial employment uses.

Term	Abbreviation	Explanation
Local presence facility		An accessible and integrated facility merging services currently provided within one-stop-shops and idea stores providing customers with the ability to access and interact with council services in different ways alongside a range of complementary activities, such as arts, leisure and learning/information services.
Local shop		Shops, typically convenience retailers, located outside of town centres and serving a local residential or working community.
Local views		A local line of sight from a particular point to an important local landmark, view or skyline.
Locally listed buildings		These are buildings of historic or architectural interest at the local level. Although they are not legally protected, close scrutiny will be given to any development affecting them.
London Legacy Development Corporation	LLDC	The LLDC became the planning authority for the Olympic Legacy area following the Olympic Games in 2012. The north-east area of Tower Hamlets (Hackney Wick/Fish Island and Bromley-by-Bow) was transferred to LLDC in terms of planning responsibilities. The planning powers of this area will be handed back to the relevant boroughs, including Tower Hamlets, by December 2024 as agreed by the Mayor of London.
London Plan		The London Plan is the spatial development strategy for all of London. It is prepared by the Greater London Authority. In London, Local Plans must be in general conformity with the London Plan.
London squares		Protected areas that may not be used for any purpose other than as an ornamental garden, pleasure ground, or ground for play, rest or recreation. No building or structure should be created or placed on or over any London square, unless necessary or convenient for the use or maintenance of the square.
London View Management Framework		A document which sets out a number of important views across London that are required to be protected.
Major centre		A major centre has over 50,000 square metres of retail space, serves a borough-wide catchment, has a combined residential and employment density (in its catchment) in excess of other centres in the borough and contains a variety of functions and services, including a growing leisure economy.

Term	Abbreviation	Explanation
Major developments		In the context of the Local Plan, major developments are defined as, 10 to 100 residential units, 1,000 to 10,000 square metres floorspace, and development on a site of more than 0.5 hectare. Please note: any policy requirement referring to major development applies to all development above these thresholds, unless otherwise stated.
Meanwhile sites		Locations that are used for temporary developments or activities while waiting for a more permanent use.
Metropolitan Centre		Metropolitan Centres are designated through the London Plan. Canary Wharf has been designated a Metropolitan Centre because it serves a wide catchment which extends over several boroughs and into parts of the wider south-east region. It contains at least 100,000 square metres of retail, leisure and service floorspace with a significant proportion of higher-order comparison goods relative to convenience goods. Canary Wharf has very good accessibility and significant employment, service and leisure functions.
Metropolitan Open Land		Strategic open land within the urban area that contributes to the structure of London and has the same protection as the Green Belt.
Mixed-use development		Development for a variety of activities on single sites or across wider areas such as town centres.
Movement hierarchy		The hierarchy of roads, streets and other movement routes that shape how people move around.
National Planning Policy Framework	NPPF	The National Planning Policy Framework sets out the government's planning policies for England.
National Planning Practice Guidance	NPPG	An online resource giving up-to-date government planning guidance and requirements.
Natural/Passive surveillance		The discouragement of crime by the presence of passers-by or the ability of people to be seen from surrounding windows.
Neighbourhood Centre		Neighbourhood centres contain a number of shops including a range of essential uses such as a pharmacy, post office or 'corner shop'. They serve a very local catchment (in the region of a ten-minute walking radius) and are located within walking distance to public transport facilities and a strategic road network.

Term	Abbreviation	Explanation
Neighbourhood Parade		Neighbourhood parades are small clusters of shops, other businesses and community facilities. They are smaller than Neighbourhood Centres and typically serve an extremely local catchment (in the region of a five-minute walking radius, or in some cases a single large housing estate).
Neighbourhood Plan		Neighbourhood plans give communities the power to plan for the areas in which they live. These must be in general conformity with the strategic priorities of the development plan, and have regard to national policy and guidance and should not promote less development than set out in the Local Plan. An adopted plan will form a part of the statutory development plan and will be used to inform planning applications within this area.
Neighbourhood planning		Neighbourhood planning gives communities the ability to create planning documents and development orders: Neighbourhood Plans and Neighbourhood Development Orders.
Net zero carbon		A net zero carbon building is where the sum total of all carbon emissions, both operational and embodied, over full lifecycle of the building, are minimised; meeting local carbon and energy targets, with residual 'offsets' equating to no additional carbon emissions being produced.
Open space (consolidated)		A process of combining open space into a single more effective or coherent whole. The way in which these spaces will function will be assessed on a site-by-site basis and agreed through the development management process. At sites with multiple-ownership, this will mean that each site has to deliver their proportion of open space adjoining the open space which the adjoining landowner will deliver, or deliver it in such a way that the open space would still form a coherent whole over the entire site allocation. We strongly encourage landowners to work jointly to develop masterplans covering the entire site allocation to ensure consolidation can be achieved whilst balancing the impact on the landowners. Consolidation should also avoid fragmentation of open space and ensure that it fulfils the qualities and function of open space set out in the Open Space Strategy.
Open space (wider definition of open space)		All land that offers opportunity for play, recreation and sport or is of amenity value, whether in public or private ownership, where public access is unrestricted, partially-restricted or restricted. This includes all open areas consisting of: major parks (e.g. Victoria Park and Mile End Park), local parks, gardens, local parks, squares, playgrounds, ecological spaces, housing amenity land, playing fields (including playing pitches), allotments and burial grounds, whether or not they are accessible to the public. This definition does not include water bodies.

Term	Abbreviation	Explanation
Open space (publicly accessible)		Open space will be considered to be publicly accessible, where access for the public is secured by virtue of legal agreements and formal arrangement; whether it is in public or private ownership. Publicly accessible open space will not include areas of water such as rivers, canals, lakes, docks or incidental spaces.
Operational Carbon		All carbon emissions associated with the energy use of a building during its lifetime.
Opportunity areas		The London Plan identifies a number of opportunity areas; this includes the City Fringe/Tech City, Isle of Dogs and South Poplar and Poplar Riverside in Tower Hamlets. These areas have the ability to accommodate high levels of growth, focusing on housing.
Optimised site-capacity		Responding to the existing qualities of the surrounding context, and balancing the capacity for growth and increased housing supply and affordability alongside an improved quality of life.
Parking stress		The availability of parking spaces in an area.
Permeability		The degree to which an area has a variety of pleasant, convenient and safe routes through it and the capacity to which those routes can enable the movement of pedestrians, cyclists and vehicles.
Permit-free		Permit-free development may contain some parking on-site, in accordance with the parking standards set out in Appendix 3. However, residents are not entitled to on-street parking permits; permit-free developments will need to provide some spaces for disabled residents and for servicing in line with the parking standards.
Place-making		A process which aims to bring all those involved in shaping the quality of a place together in an inclusive and multi-dimensional manner, in order to create sustainable communities and high quality places. Place-making capitalises on a local community's assets, inspiration, and potential, ultimately creating places that people feel proud of and have a stake in.
Planning obligation/S106 agreement		A legal agreement between the developer, local authority and other interested parties primarily intended to make acceptable those developments that would otherwise be unacceptable in planning terms.
Planning Policy for Traveller Sites		This document sets out the government's planning policy for traveller sites.

Term	Abbreviation	Explanation
Policies Map		A part of the Local Plan illustrating the policies and showing the location of proposals on an Ordnance Survey base map.
Polluting development		A part of the Local Plan illustrating the policies and showing the location of proposals on an Ordnance Survey base map.
Preferred Office Location	POL	Area with major office development as the focus, with supporting uses such as gyms, hotels, restaurants and retail uses helping to achieve a sustainable office environment.
Primary and Secondary Frontages		Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.
Private rented sector		All non-owner occupied self-contained dwellings that are being rented out as housing (not including forms of affordable housing).
Public art		Artworks which members of the public are able to access and appreciate. Works may be sited in the public, civic, communal or commercial domain, in semi-public or privately owned public space, or within public, civic or institutional buildings. Artworks can form part of the structure or decoration of buildings, landscapes and streetscapes.
Public sector land		land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed
Public realm		A collective term for all outside elements of the built environment that are accessible to the public, including but not limited to streets, squares, river frontages, and parks. Spaces that are privately owned can still form part of the public realm, if they are accessible to the public.
Public square		A consolidated area of open space primarily used by pedestrians, which should include well-defined edges and active frontages. It should be multifunctional and suitable for gatherings and should be well integrated with the wider movement network. The precise shape/form of the public square will be determined through the development management process.
Public Transport Accessibility Level	PTAL	A measure which rates locations by distance from frequent public transport services (from 0 to 6a, where a score of 0 is very poor and 6a is excellent).

Term	Abbreviation	Explanation
Railway Arches		Spaces underneath railway infrastructure that plays host to a variety of businesses and other uses. Includes both traditional brick arches and the larger spaces underneath the DLR.
Referable development		Planning applications of strategic importance to London are referred to the Mayor of London. In Tower Hamlets, this applies to developments of 150 residential units or more, developments over 30 metres in height, and development on Metropolitan Open Land.
Renewable energy		Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy.
Safeguarded wharves		A network of sites that have been safeguarded for cargo handling uses such as intraport or transshipment movements and freight-related purposes by Safeguarding Directions. A site remains safeguarded unless and until the relevant Safeguarding Direction is formally removed or amended.
Scheduled monument		A collection of heritage assets designated for their historic, architectural, traditional, artistic or archaeological interest.
Secured by Design	SBD	A police security initiative that works to improve the security of buildings and their immediate surroundings through design guidance.
Sensitive development		A development which would allow users of the site to potentially be exposed to pollutants above the objective for the relevant period. For example, the introduction of a new residential development into an area where an air quality objective is already exceeded, would create the potential for the exposure of residents to poor air quality above the objective. This type of development may also generate significant additional traffic flow and also be a polluting development.
Setting (of a heritage asset)		The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral
Short stay accommodation		Short stay accommodation is defined as hotels, apart-hotels, serviced apartments and hostels.

Term	Abbreviation	Explanation
Site allocation		A parcel of land which has been set aside in the plan to accommodate strategic housing developments (i.e. sites that can provide over 500 new net-additional homes) and other uses such as employment and retail space. These sites are also expected to deliver significant infrastructure with capacity to accommodate future growth and development.
Site Environmental Management Plan	SEMP	Submission of an SEMP is required to ensure compliance with the CoCP for strategic and major development proposals. The contents of an SEMP will include a noise and vibration management plan that sets out the location of noise and vibration sensitive receptors and detail how noise and vibration arising from demolition and/or construction will be controlled and limited as far as is reasonably practicable, so that all receptors are protected from excessive noise and vibration levels.
Sites of Importance for Nature Conservation	SINC	Locally defined non-statutory sites of wildlife and geological importance.
Skyline of strategic importance		A significant element of the townscape of Tower Hamlets, formed by the cluster of buildings around Canary Wharf. This cluster is visible across London and has become a globally recognised silhouette.
Social value		Social value refers to a broader concept of value beyond just monetary contribution. It focuses on people and contribution to the community, assessing the positive value created for the local economy, improvements in social wellbeing, and enhancements to protect the local environment.
Space Heating Demand	SHD	The amount of heat energy needed to heat a building over a year, expressed in kWh/m ² /yr, used as an indicator of thermal and energy efficiency.
Spatial Development Strategy	SDS	The London Plan is the statutory spatial development strategy for the Greater London area that is prepared by the Mayor.
Spatial policies		High-level, overarching policies to help guide development and the use of land throughout the borough.
Specialist housing		Specialist housing refers to supported housing such as sheltered housing, residential care homes, nursing homes and dual-registered care homes.

Term	Abbreviation	Explanation
Specialist Centres		Centres within the town centre hierarchy that have a specific economic or cultural function. Includes Columbia Road, Redchurch Street and Hackney Wick.
Statement of Community Involvement	SCI	This sets out how and when we will consult with local and statutory stakeholders in preparing, altering and updating development plan documents and supplementary planning documents.
Strategic development		Proposals involving over 100 homes or 10,000 square metres of floorspace.
Strategic Industrial Location	SIL	Designated by the London Plan. This designation seeks to ensure that there are sufficient sites, in appropriate locations, to meet the needs of the general business, industrial, warehousing, waste management and some utilities and transport sectors.
Strategic Housing Land Availability Assessment	SHLAA	An assessment produced by the Greater London Authority which identifies a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period.
Local Housing Need Assessment	LHNA	This sets out estimates of the borough's current and future housing need.
Strategic Flood Risk Assessment	SFRA	A study which assesses the risk to an area from flooding from all sources, now and in the future, taking into consideration the impacts of climate change, to assess the cumulative impact that land use changes and developments in the area will have on flood risk.
Street furniture		A collective term for objects and pieces of equipment installed along streets and roads for various purposes, including benches, road signs, postboxes, telephone kiosks, and street lighting.
Streetscape		The appearance of the street as a whole incorporating the road, kerb and gutter, verges, fences, trees and building frontages.
Supplementary Planning Document	SPD	A document which helps explain how policies and proposals in the plan will be applied and implemented.

Term	Abbreviation	Explanation
Supplementary Planning Guidance/ London Plan Guidance	SPG/LPG	London Plan Guidance (LPG) provides further information about how the current London Plan should be implemented. Supplementary Planning Guidance (SPG) documents have been prepared to support earlier London Plans.
Sustainability Appraisal	SA	A legal assessment of the social, economic and environmental effects of relevant plans and programmes. This tool is used alongside the Strategic Environmental Assessment, Health Impact Assessment, Habitats Regulations Assessment and Equalities Impact Assessment to appraise impacts on specific groups or characteristics.
Sustainable community		A place or neighbourhood where people have a decent and affordable home to live in and have good access to jobs and services, such as schools, open space and shops, in a safe, inclusive and attractive environment, with opportunities to engage in social and community-based activities, preferably without the need to use a car.
Sustainable Drainage Systems	SuDS	Sequence of water management systems which are designed to manage flood and pollution risks resulting from urban runoff by draining surface water in a sustainable manner. This is achieved by mimicking natural drainage, encouraging infiltration, attenuation, and passive treatment. SuDS can also contribute towards urban greening, biodiversity, and placemaking.
Tall buildings		Within Tower Hamlets, tall buildings are defined as those which are above 30m in height, from ground level to the uppermost element of the building, including any architectural features such as spires, or any other protruding elements such as telecommunications infrastructure or plant.
Tall building cluster		A primarily visual definition based on existing and emerging concentrations of tall buildings, particularly where they form a cohesive group. Tall building clusters generally have a distinctive shape or are visually prominent.
Tall Building Zone	TBZ	A spatial designation that indicates where development proposals for tall buildings may be acceptable within the parameters listed in the policy. These designations are based on the existing distribution of tall buildings, the potential impact of tall buildings on the character of an area, and their capacity for growth and change.

Term	Abbreviation	Explanation
Tenure-blind developments		Schemes that are designed to maximise tenure integration, and affordable housing units designed with the same external appearance as private housing.
Tower Hamlets Activity Areas		Areas of the borough that act as a transition from the predominantly commercial character of the City Fringe and Canary Wharf to the residential character of surrounding communities. These areas tend to have a denser mix of uses than adjacent residential communities and can support the spillover of employment uses from designated employment locations.
Town centre hierarchy		This sets out what role and function different centres in the borough perform in relation to each other and across London. In Tower Hamlets it includes: the Central Activities Zone, Tower Hamlets Activity Areas, Canary Wharf Metropolitan Centre and a series of District Centres, Neighbourhood Centres and Neighbourhood Parades.
Townscape		The term 'townscape' refers very broadly to the overall character and composition of a town (or other aspects of the built environment). It can include the range and quality of buildings in an area, the relationships between those buildings and the different types of space between and around them, and reflects the relationship between people and place.
Transport Assessment		This is prepared and submitted alongside planning applications for developments likely to have significant transport implications. For major proposals, assessments should illustrate the following: accessibility to the site by all modes; the likely modal split of journeys to and from the site; and proposed measures to improve access by public transport, walking and cycling.
Transport interchange		A place where passengers are exchanged between vehicles or different transport modes.
Travel Plan		Travel plans are long term management strategies which should support sustainable and active travel at both new and existing developments.
Urban grain		The complexity and coarseness of an urban area. Fine grained areas have a large number of different buildings and closely spaces streets. Course grained areas have large blocks and building and little architectural variety.

Term	Abbreviation	Explanation
Urban Greening Factor	UGF	Urban greening is a process of introducing vegetation and green spaces into urban areas. It is an initiative to create more sustainable cities with a better quality of life for its residents, by reducing heat, absorbing pollutants from the air, and promoting biodiversity. The Urban Greening Factor (UGF) is a tool that evaluates and quantifies the amount and quality of urban greening that a development scheme provides to inform decisions about appropriate levels of greening in new developments.
Urban Heat Island effect	UHI	An Urban Heat Island (UHI) is an urban area that is significantly warmer than its surrounding rural areas. This happens because the sun's rays are absorbed by hard surfaces rather than by vegetation such as trees, plants, and grass. Radiation from hard surfaces is released into the air as heat. This process exacerbates the city's already hotter and drier summers through urban heat island effect. The UHI reduces the ability for the city to cool and impacts our capacity to regulate temperature.
Waste apportionment		The amount of London's waste that each borough is required to manage to ensure London is self-sufficient in managing its municipal, commercial and industrial waste that it produces. This requires an amount of land to be safeguarded within the borough.
Water neutrality		When total demand for water in a building is the same before and after a development is built. This is achieved by retrofitting older homes and businesses with water efficiency devices, and ensuring that new building and development are highly water efficient.
Water space		An area of water (that exists permanently or intermittently), and includes rivers, canals, docks, basins, ponds, marshland and other water bodies.
Whole Lifecycle Carbon	WLC	The entire amount of carbon resulting from a building or development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/ construction, operation, maintenance and eventual material disposal.
Windfall site		Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available. In Tower Hamlets, we define small sites as sites that contain fewer than 10 housing units.
World Heritage Sites	WHS	A natural or man-made site, area, or structure recognized as being of outstanding international importance and therefore as deserving special protection. Sites are nominated to and designated by the World Heritage Convention (an organization of UNESCO).

Appendix 2: Financial contribution calculation methodologies

Policy DV5 (Developer contributions) of the Local Plan sets out the council's approach to seeking contributions from developers towards funding improvements to infrastructure, the environment and the community. This includes Section 106 planning obligations which may be financial or non-financial.

The following sets out the methodologies to calculate certain financial contributions. Further information is provided in the relevant policies and the Planning Obligations Supplementary Planning Document (SPD) about how and when these financial contributions will be required. Where appropriate, costings will be adjusted for inflation by index-linking from the date of the Planning Obligations SPD through to payment. The Planning Obligations SPD may be subject to periodic review.

The methodologies included in this appendix are intended to provide detail on how these contributions will typically be calculated in instances when they are required. The methodologies included are not an exhaustive list and the council may wish to negotiate other forms of planning obligations which meet the CIL Regulation 122 tests depending on the individual circumstances of a site and scheme.

Financial Contribution toward development co-ordination and integration (Policy DV5)

Contributions towards development co-ordination and integration projects and interventions by the council will be calculated using the following formula:

£200 x number of residential units

+

£2 x sqm of non-residential floorspace

= financial contribution

Financial Contribution towards affordable housing (Policy HF2, Policy HF4 and Policy HF7)

Major applications

In exceptional circumstances only, the council will accept a payment-in-lieu for affordable housing where the contribution will secure more than 50% affordable housing provision.

Minor applications

Financial contributions for sites delivering 2-9 new residential units will be calculated by a Tariff per unit commencing at 2 units subject to the development sites CIL area:

CIL Zone	Contribution per Unit
3	£75,000
2	£130,000
1	£170,000

Financial Contribution towards wheelchair accessible housing (Policy HF9)

In instances where a payment in lieu is accepted, the contribution will be based on the following formula, subject to an updated retrofitting cost:

Number of wheelchair units not to be delivered on-site
X
Installation costs of retrofitting an existing home
= financial contribution

Financial Contributions to help provide off-site Children's Play Space (Policy HF9)

Contributions to help fund the cost of off-site provision of children's play space for developments where this play space is not provided on-site will be calculated according to the following formula:

Number of children (using child yield calculator)
X
10m2 of play space = play space requirement

Average cost per square metre
X
Shortfall in play space requirement provided onsite = play space contribution

Play space contribution + maintenance fee
= financial contribution

Financial Contribution towards energy offsetting (Policy CG3)

In circumstances where energy offsetting is accepted, the contribution will be calculated according to the following formula:

EUI (kWh/m2/yr)
-
Renewable energy generation (kWh/m2/yr)
= Energy gap

Energy Gap (kWh)
X
£1.32/kWh*
= The energy offset contribution

*The offset price will be set on the basis of cost to install PVs elsewhere in the borough. Using a reasonable cost rate for a high output PV system with micro-inverters (i.e. £1,016/kWp) and applying a 10% additional rate for administering and managing the PV funding process, would give an energy offset price of £1.32/kWh/yr. The offset costs may be updated as required.

Financial Contribution towards surface water drainage offset (Policy CG7)

In exceptional circumstances where the required flow and volume restrictions cannot be achieved on site and at the council's discretion, a financial contribution will be calculated in accordance with the following formula:

Exceedance of surface water drainage standard (Proposed water run-off at peak times – Policy CG7 runoff rate)
X
£785 per m ³ (offset unit cost)*
= financial contribution

*the most up to date offset unit cost at the time of approval will be used.

Financial Contribution towards water efficient design offset (Policy CG8)

In exceptional circumstances where the required maximum mains water use cannot be achieved on site and at the council's discretion, a financial contribution will be calculated in accordance with the following formula:

(Proposed mains water use per person per day – maximum mains water use allowance in Policy CG8)
X
£123.90 per litre (offset unit cost)*
= financial contribution

*the most up to date offset unit cost at the time of approval will be used.

Financial Contribution towards air quality offset (Policy CG9)

The method for calculating the air quality offset payment is set out in Section 5 of the Air Quality Neutral London Plan Guidance.

Financial Contribution towards employment, skills, and training (Policy EG1)

The following methodologies will be used to calculate the level of financial contributions towards employment, skills, and training activities:

Construction phase

£4
X
Sqm of the total new development floorspace (GIA)
= financial contribution

End user phase

Employee yield of the development
X
20% (aspirational labour target)
X
Current cost of training and support
= financial contribution

Apprenticeships

A payment in lieu towards apprenticeships where there is shortfall against the target number of apprenticeships:

Number of apprenticeships not provided
X
Cost for providing apprenticeship (calculated as cost of training per person + 35 hours p/w at London Living Wage for 52 weeks)

Financial Contributions towards affordable workspace (Policy EG3)

In instances where a payment in lieu is accepted, it will be calculated in accordance with the formula below. The commuted sum will be used by the council to provide affordable workspace in the Borough. As such, the calculation accounts for the costs the council will incur when delivering these spaces.

Step 1:

15% of GIA (sqm)
X
rental value per sqm (based on projected rental values from subject property or a comparable property)
= rent per annum

Step 2:

Rent per annum
X
$((((1 + i) n) - 1) / (i (1 + i) n))$
= Contribution

n = discount period

i = All risks yield (calculated as subject property commercial yields / 100)

Monitoring fees (Policy DV5)

All developments requiring a legal agreement will include a monitoring fee to cover the costs of monitoring the agreements for the lifetime of the obligations. Monitoring fees for specific types of obligations may also be sought where on-going monitoring is required, this includes:

- Health Impact Assessment monitoring
- Social Value Strategy monitoring
- Affordable Housing delivery and compliance monitoring
- Low carbon energy and heating
- Water efficient design
- Employment, skills, enterprise monitoring
- Travel Plan monitoring.

Appendix 3: Links to the Tower Hamlets Local Plan 2031 (Managing growth and sharing the benefits)

The table below explains how the policies from the adopted Tower Hamlets Local Plan 2031 (Managing growth and sharing the benefits) have been replaced in this Local Plan.

New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Delivering the Local Plan	Achieving sustainable growth
Policy DV1 Areas of growth and opportunity within Tower Hamlets	Policy S.SG1: Areas of growth and opportunity within Tower Hamlets
Policy DV2 Delivering sustainable growth in Tower Hamlets	Policy S.SG2: Delivering sustainable growth in Tower Hamlets
Policy DV3 Healthy communities	Policy D.SG3: Health impact assessments
Policy DV4 Planning and construction of new development	Policy D.SG4: Planning and construction of new development
Policy DV5 Developer contributions	Policy D.SG5: Developer contributions
Policy DV6 Social value	
Policy DV7 Utilities and digital connectivity	
Policy DV8 Site Allocations	
Homes for the community	Meeting housing needs
Policy HF1 Meeting housing needs	Policy S.H1: Meeting housing needs
Policy HF2 Affordable housing and housing mix	Policy D.H2: Affordable housing and housing mix
Policy HF3 Protection of existing housing	

New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Policy HF4 Supported and specialist housing and housing for older people	Policy D.H4: Specialist housing
Policy HF5 Gypsy and traveller accommodation	Policy D.H5: Gypsies and travellers accommodation
Policy HF6 Purpose-built student accommodation	Policy D.H6: Student housing
Policy HF7 Large-scale purpose-built shared-living	
Policy HF8 Housing with shared facilities (houses in multiple occupation)	Policy D.H7: Housing with shared facilities (houses in multiple occupation)
Policy HF9 Housing Standards and Quality	Policy D.H3: Housing standards and quality
Clean and green future	Protecting and managing our environment
Policy CG1 Mitigating and adapting to a changing climate	Policy S.ES1: Protecting and enhancing our environment
Policy CG2 Low energy buildings	Policy D.ES7: A zero carbon borough
Policy CG3 Low carbon energy and heating	Policy D.ES7: A zero carbon borough
Policy CG4 Embodied carbon, retrofit and the circular economy	Policy D.ES7: A zero carbon borough
Policy CG5 Overheating	Policy D.ES10: Overheating
Policy CG6 Managing flood risk	Policy D.ES4: Flood risk
Policy CG7 Sustainable Drainage	Policy D.ES5: Sustainable drainage
Policy CG8 Water efficient design	Policy D.ES6: Sustainable water and wastewater management
Policy CG9 Air quality	Policy D.ES2: Air quality

New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Policy CG10 Noise and vibration	Policy D.ESg: Noise and vibration
Policy CG11 Contaminated land and storage of hazardous substances	Policy D.ES8: Contaminated land and storage of hazardous substances
People, places and spaces	Creating attractive and distinctive places
Policy PS1 Design- and infrastructure-led approach to development	Policy D.DH7: Density
Policy PS2 Tall buildings Mayor's office to read accompanying note which explains the changes.	Policy D.DH6: Tall buildings
Policy PS3 Securing design quality	Policy S.DH1: Delivering high quality design; and policy D.DH8: Amenity
Policy PS4 Attractive streets, spaces, and public realm	Policy D.DH2: Attractive streets, spaces and public realm
Policy PS5 Creating inclusive spaces	
Policy PS6 Heritage and the historic environment	Policy S.DH3: Heritage and the historic environment
Policy PS7 World heritage sites	Policy S.DH5: World heritage sites
Policy PS8 Shaping and managing views	Policy D.DH4: Shaping and managing views
Policy PS9 Shopfronts	Policy D.DH9: Shopfronts
Policy PS10 Advertisements, hoardings and signage	Policy D.DH10: Advertisements, hoardings and signage
Policy PS11 Siting and design of telecommunications infrastructure	Policy D.DH11: Telecommunications


New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Inclusive economy and good growth	Delivering economic growth
Policy EG1 Creating investment and jobs	Policy S.EMP1: Creating investment and jobs
Policy EG2 New employment space	Policy D.EMP2: New employment space
Policy EG3 Affordable workspace	Policy S.EMP1: Creating investment and jobs
Policy EG4 Loss and Redevelopment of employment space	Policy D.EMP3: Loss of employment space; Policy D.EMP4: Redevelopment within the borough's employment areas
Policy EG5 Railway Arches	
Policy EG6: Data centres	
Town centres	Revitalising our town centres
Policy TC1 Supporting the network and hierarchy of centres	Policy S.TC1: Supporting the network and hierarchy of centres
Policy TC2 Protecting the diversity, vitality and viability of our town centres	Policy D.TC2: Retail in our town centres
Policy TC3 Town centre uses outside our town centres	Policy D.TC3: Retail outside our town centres
Policy TC4 Markets	Policy D.TC7: Markets
Policy TC5 Food and drink	Policy D.TC5: Food, drink, entertainment and the night-time economy
Policy TC6 Entertainment Uses	Policy D.TC5: Food, drink, entertainment and the night-time economy
Policy TC7 Evening and Night-time Economy	Policy D.TC5: Food, drink, entertainment and the night-time economy
Policy TC8 Short-stay accommodation	Policy D.TC6: Short-stay accommodation



New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Community infrastructure	Supporting community facilities
Policy CI1 Supporting community facilities	Policy S.CF1: Supporting community facilities
Policy CI2 Existing community facilities	Policy D.CF2: Existing community facilities
Policy CI3 New and enhanced community facilities	Policy D.CF3: New and enhanced community facilities
Policy CI4 Public houses	Policy D.CF4: Public houses
Policy CI5 Arts and culture facilities	
Biodiversity and open space	Enhancing open spaces and water spaces
Policy BO1 Green and blue infrastructure	Policy S.OWS1: Creating a network of open spaces
Policy BO2 Open spaces and the Green Grid network	Policy D.OWS3: Open space and green grid networks
Policy BO3 Water spaces	Policy D.OWS4: Water spaces
Policy BO4 Biodiversity and access to nature	Policy D.ES3: Urban greening and biodiversity
Policy BO5 Urban greening	Policy D.ES3: Urban greening and biodiversity
Policy BO6 Play and recreation spaces	
Policy BO7 Food growing	
Movement and connectivity	Improving connectivity and travel choice
Policy MC1 Sustainable Travel	Policy S.TR1: Sustainable travel
Policy MC2 Active Travel and healthy streets	



New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Policy MC3 Impacts on the transport network	Policy D.TR2: Impacts on the transport network
Policy MC4 Parking and permit-free	Policy D.TR3: Parking and permit-free
Policy MC5 Sustainable delivery, servicing, and construction	Policy D.TR4: Sustainable delivery and servicing
Reuse, recycling and waste	Managing our waste
Policy RW1 Managing our waste	Policy S.MW1: Managing our waste
Policy RW2 New and enhanced waste facilities	Policy D.MW2: New and enhanced waste facilities
Policy RW3 Waste collection facilities in new development	Policy D.MW3: Waste collection facilities in new development


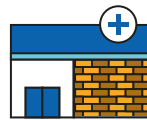
Appendix 4: Key monitoring indicators




The table below sets out the framework for monitoring the performance and effectiveness of the draft new Local Plan for Tower Hamlets and includes targets where these apply. Progress against these indicators will be reported in the borough's future Annual Monitoring Reports (AMR).

Topic area	Policies	Key monitoring indicator
Delivering the local plan  Page 562	DV1 - Areas of growth and opportunity within Tower Hamlets	Approvals and completions of new homes, employment and retail and leisure floorspaces within the following sub-areas: <ul style="list-style-type: none"> ● City Fringe ● Central ● Isle of Dogs and South Poplar ● Leaside
	DV1 - Areas of growth and opportunity within Tower Hamlets DV8 - Site allocations	Delivery of housing and key infrastructure requirements through site allocations (not including school sites)
	DV3 - Healthy communities	Monitoring the quantity of Rapid and detailed Health Impact Assessments submitted
	DV5 - Developer contributions	Breakdown of community infrastructure levy and S106 monies received and/or negotiated across all topic areas
	DV6 - Social value	Number of additional planning obligations secured within a monitoring year as a result of a social value strategy submission

Topic area	Policies	Key monitoring indicator
Homes for the community 	HF1 - Meeting housing needs	Net additional homes in the monitoring year and previous years by housing type and tenure
	HF2 - Affordable housing and housing mix	Percentage of new homes that are affordable, measured by unit and habitable room
		Percentage of new homes that are affordable, measured by unit and habitable room
	HF5 - Gypsy and Traveller accommodation	Number of Gypsy and Traveller pitches
HF9 - Housing standards and quality	Delivery of wheelchair accessible/ adaptable homes across all housing types	
Clean and green future 	CG2 - Low energy buildings	Number of developments meeting assured performance targets
	CG3 - Low carbon energy and heating	Quantity of PV panels installed
		Number of developments contributing total energy use and renewable energy generation figures
	CG4 - Embodied carbon, retrofit and the circular economy	Developments meeting upfront embodied carbon target
		Number of retrofit plans submitted
	CG5 - Overheating	Number of developments needing to provide detailed overheating assessments
	CG6 - Managing flood risk	Number of developments approved against Environment Agency advice in relation to flood risk and water quality grounds
	CG7 - Sustainable Drainage	Quantity of major developments achieving greenfield run-off
	CG8 - Water efficient design	Water consumption per capita, at a Thames Water regional level
CG9 - Air quality	Concentration of each pollutant at each monitoring station	
	The number of developments that meet or exceed the air quality neutral standards	
	Number of Air Quality Positive Statements submitted.	

Topic area	Policies	Key monitoring indicator
People, places and spaces 	PS1 - Design and infrastructure-led approach to development	Number of applications required to submit infrastructure impact assessment documents
	PS2 - Tall buildings	Number of tall buildings permitted (for the purposes of this indicator, developments referable to the Mayor of London for being over 30m in height will be looked at)
	PS6 - Heritage and the historic environment	Number of designated heritage assets (scheduled ancient monuments, listed buildings, registered parks and gardens, London squares, and conservation areas)
		Removal of heritage assets at risk from the risk register
Inclusive economy and good growth Page 564 	EG1 - Creating investment and jobs	Net additional employment floorspace delivered by type
		Net additional jobs by type
	EG2 - New employment space	Number of new enterprises created in the borough
	EG3 - Affordable workspace	Net additional affordable workspace
	EG4 - Loss and redevelopment of employment space	Gain/loss of employment floorspace in designated employment locations
		Gain/loss of industrial floorspace in designated industrial locations
	EG5 - Railway arches	Gain/loss of employment floorspace within railway arches
EG6 - Data centres	Net increase in data centre (class B8 or SG) floorspace across the borough and within designated employment locations	

Topic area	Policies	Key monitoring indicator
Town centres 	TC1 - Supporting the network and hierarchy of town centres	Proportion and number of town centre uses (class E) within town centres
	TC2 - Supporting the diversity, vitality and viability of town centres	Town centre vacancy rates
	TC3 - Town centre uses outside centres	Number and floorspace of new town centre uses approved outside of town centres
	TC4 - Markets	Number of pitches and vacancy level in council-operated street markets
	TC5 - Food and drink	Number and proportion of hot food takeaways in town centres; number of new hot food takeaways permitted across the borough; number of new hot food takeaways permitted within 400m of an existing or proposed school or local authority leisure centre
	TC6 - Entertainment uses	Number and proportion of betting shops, casinos and other gambling establishments in town centres; number of new gambling establishments approved within 400m of an existing gambling establishment
	TC7 - Evening and night-time economy	Proportion of businesses in town centres with late opening licenses; proportions of different use classes operating at night
	TC8 - Short-stay accommodation	Approvals and completions of additional short-stay (class C1) accommodation
Community infrastructure 	CI1 - Supporting community facilities	Applications and approvals for new/loss of class E(d-f), F1, F2(b and d) and sui generis uses that provide a service to the local community
	CI2 - Existing community facilities	
	CI4 - Public houses	Loss/gain of public house (class SG) floorspace
	CI5 - Arts and culture	Applications and approvals for new/loss of class F1(b-d) and sui generis uses that provide an arts and culture use

Topic area	Policies	Key monitoring indicator
Biodiversity and open space  Page 566	BO1 - Green and Blue Infrastructure	0.84ha of publicly accessible open space per 1,000 residents
		Publicly accessible open space losses and gains (approved applications)
		Publicly accessible open space losses and gains (delivered)
	BO3 - Water spaces	Improvement of access to water spaces
		Losses and gains of water spaces
		Ecological quality of the Lower Lea River
	BO4 - Biodiversity and access to nature	Area(s) of open space designated as a Site of Nature Conservation Interest
Number of developments delivering 30% Biodiversity Net Gain		
BO6 - Play and recreation spaces	Number of new high quality play spaces provided by age group	
	Provision of temporary play space and renewed existing play space of a higher quality	
BO7 - Food growing	Number of allotments and community gardens	
Movement and connectivity 	MC1 - Sustainable travel	Transport modal share among residents
	MC4 - Parking and permit free	Number of Transport for London cycle docking stations in the borough
		Number of bike parking spaces approved in applications
		Number of electric vehicle charging points approved in applications
Reuse, recycling and waste 	RW1 - Managing our waste	Safeguarding of waste sites or maintaining waste management capacity for apportionment targets if sites are lost
		Monitoring of operating waste management facilities within the borough
		Recycling rates across the borough

Appendix 5: Noise

Noise thresholds

Noise can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities. Noise can interfere with residential and community amenity and the utility of noise-sensitive land uses.

The significance of noise impact varies dependent on the different noise sources, receptors and times of operation presented for consideration within a planning application. Therefore, thresholds for noise and vibration evaluate noise impact in terms of various 'effect levels' as described in the National Planning Policy Framework.

Aims

Policy CG10 of the Local Plan is seeking to effectively control and manage environmental, neighbour and neighbourhood noise within the context of government policy on sustainable development. It aims to:

1. avoid significant adverse impacts on health and quality of life;
2. mitigate and minimise adverse impacts on health and quality of life; and
3. where possible, contribute to the improvement of health and quality of life.

Approaches to managing noise

1. Good design – Ensuring developments incorporate the concept of "good acoustic design"¹, including through minimising the number of sensitive receptors exposed to noise; ensuring adequate distances between the noise source and sensitive receptors or areas, limiting conflict of use in the development both internally and externally; utilising where possible barriers, natural or otherwise, other buildings, or non-critical rooms in a building.
2. Engineering – reducing noise at source; improving the sound insulation internally and externally of exposed receptors; screening by purpose-built barriers.
3. Administrative – limiting operation time of source, restricting activities allowed on the site, specifying an acceptable noise limit. Several of these measures may be incorporated into the design of a development proposal. Where development is likely to be affected by, or give rise to, high noise levels, applicants are advised to seek the advice of environmental health officers or those with similar expertise.

¹ For more detail see ProPG: Planning and Noise – New Residential Development (Institute of Acoustics and Chartered Institute of Environmental Health and the Association of Noise Consultants, 2017).

General principles

When considering applications for development that will be exposed to an existing noise source, we will take into account the ambient noise level existing at the proposed location at the time of the application and any future likely increase in noise impact that may reasonably be anticipated to occur due to development in the foreseeable future.

Much of the borough is subject to ambient noise levels during the day and at night from transportation, commercial, industrial and leisure sources that are higher than those at which the lowest adverse effects, as defined in policy and guidance, can occur. Development therefore should not make the noise circumstances worse and where possible should improve the situation by lowering noise levels and/or modifying the soundscape in a positive fashion.

In the case of applications involving noise sensitive developments, we will require an applicant to include information about the noise impact of development, or the assessed effect of an existing noise source and transport, industrial or commercial operation upon the development proposed.

A noise impact assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure as set out in Policy CG10. Developers will be required to assess the impact of the proposal as a noise generator or receptor, as appropriate. It will also be required to demonstrate in full how the development will be designed, located, and controlled to mitigate (as appropriate) the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.

We recommend that you seek advice from the council's environmental health department in advance of any noise surveys on the methodology,

duration, and timing etc. of any surveys and advice regarding the nearest noise sensitive receptor.

In all cases, the best practical means of mitigation will be required to mitigate noise impact to an appropriate level, and in liaison with the council's environmental health service.

Where necessary, we will use planning conditions and enter into planning obligations under Section 106 of the Town and Country Planning Act 1990 (as modified by Section 12 of the Planning and Compensation Act 1991) to control noise levels.

Further information and guidance

- Noise Policy Statement for England (Department for Environment, Food and Agriculture, 2010)
- Heating and Ventilation Contractor Association – DW/172 Specification for Kitchen Ventilation Systems (2005)
- British Standard 8233: Guidance on Sound insulation and noise reduction for buildings (2014)
- British Standard 4142: Methods for rating and assessing industrial and commercial sound (2014)
- British Standard 6472: Guide to evaluation of human exposure to vibration in buildings (2008)
- BB93: Acoustic design of schools: performance standards (2015)
- British Standard 5228:2009+A1:2014 Code of practice for noise and vibration on construction and open sites (2014)
- ProPG: Planning and Noise – New Residential Development (Institute of Acoustics and Chartered Institute of Environmental Health and the Association of Noise Consultants, 2017).

Design criteria

The design criteria given below are targets the borough wants to see achieved within the context of government policy on sustainable development. Where a variation from these standards is sought, a detailed submission of the reasons and noise effects must be provided as early as possible, preferably through the pre-application process. Any variation will be considered with respect to the context of the scheme (including its use, design, and location) and any wider benefits, as directed by national policy and guidance. Three basic criteria have been developed to inform the design and layout of proposed developments; these being aimed at guiding applicants as to the degree of detailed consideration needed to be given to noise in any planning application.

The design criteria outlined below are defined in the corresponding noise tables.

- NOEL – No observed effect level
- LOAEL – Lowest observed adverse effect level
- SOAEL – Significant observed adverse effect level.

The values will vary depending on the context, type of noise and sensitivity of the receptor.

- **Green** – where noise is considered to be at an acceptable level. In this category development is likely to be granted.
- **Amber** – where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development. In this category permission is likely to be refused unless a good acoustic design process is followed.

- **Red** – where noise is observed to have a significant adverse effect. In this category development is likely to be refused. Applicants should seek expert advice on possible noise mitigation measures.

Proposed developments - sensitive to noise

Special consideration will need to be given to noise-sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise which are likely to have an adverse effect. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced, or likely to be experienced.

Applications for residential development should demonstrate a consideration of 'good acoustic design'².

² For more detail see ProPG: Planning and Noise – New Residential Development (Institute of Acoustics and Chartered Institute of Environmental Health and the Association of Noise Consultants, 2017).

Table 19: Noise levels applicable to noise sensitive residential development proposed in areas of existing noise

Dominant noise source	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Anonymous noise such as general environmental noise, road traffic and rail traffic	Noise at 1 metre from noise sensitive façade (free field)	Day	<50dBLAeq, 16hr*	50dB to 69dBLAeq, 16hr*	>69dBLAeq, 16hr*
		Night	<45dBLAeq,8hr	Between 45dB and 60dB LAeq, 8hr.	>60dB LAeq,8hr
	Inside a bedroom	Day	<40dBLAeq,16hr	40dBLAeq, 16hr	>40dBLAeq,16hr
		Night	<30 dBLAeq,8hr <45dBLAmax,fast	30 to 35dB LAeq,8hr >45 to 60 dBLAmax, fast	>35 dBLAeq, 8hr >60dBLAmax fast
	Outdoor living space (free field)	Day	<50dBLAeq,16hr	50dB to 55dBLAeq,16hr	>55dBLAeq,16hr
	Non-anonymous noise	See guidance note on non-anonymous noise			

*LAeq, T values specified for outside a bedroom window are free field levels

The levels given above are for dwellings; however, levels are use specific and different levels will apply dependent on the noise sensitivity of the use of the premises. We will also take into account the likely times of occupation for types of development and will amend according to the times of operation of the establishment under consideration.

Industrial and commercial noise sources

Relevant standard or guidance document should be referenced when determining values for LOAEL and SOAEL for noise. The standard or guidance should only be used within its intended scope.

Where appropriate, it is expected that the most-up-to-date version of British Standard 4142 'Methods for rating and assessing industrial and commercial sound' will be used. For such cases, a 'rating level' of 10dB below background at 1 metre from the boundary of the nearest noise sensitive receiver should be considered as the design criterion.

Noise insulation

Where the development falls within an area of high noise (amber and red), the most up-to-date version of British Standard 8233 should be met.

Table 20: Noise levels applicable to proposed industrial and commercial developments (including plant and machinery)

Existing noise sensitive receptor	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Dwellings**	Garden used for main amenity (free field)	Day	< 50 dB LAeq, 16 hr	>50<55 dB LAeq,16 hr	>55 dB LAeq,16 hr
Dwellings**	Outside living or dining or bedroom window (façade)	Day	'Rating level' 10dB* below background	'Rating level' between 9dB below and 5dB above background	'Rating level' greater than 5dB above background
Dwellings**	Outside bedroom Window (façade)	Night	'Rating level' 10dB* below background	'Rating level' between 9dB below and 5dB above background	'Rating level' greater than 5dB above background

* Rating level as per BS 4142:2014** Levels given are for dwellings; however, levels are use specific and different levels will apply dependent on the noise sensitivity of the use of the premises.

Entertainment noise

Assessments for noise from proposed entertainment and leisure premises or from proposed sensitive uses in close proximity to existing entertainment and leisure premises must include consideration to amplified and unamplified music, human voices, footfall and vehicle movements and other general activity. Appropriate metrics must be used to measure and assess the noise impact including LAeq, and LAm_{ax}, LA₁₀ and NR metrics and as appropriate along with consideration of the source frequency spectrum. The borough will resist development where it is not possible to achieve the levels for noise from proposed entertainment venues within existing noise sensitive receptors, or from existing entertainment venues within proposed noise sensitive receptors, given below.

Table 21: Noise levels applicable to proposed entertainment premises and proposed sensitive uses in close proximity to existing entertainment and leisure premises

Noise sensitive receptor	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Dwellings	Garden used for amenity (free field)	Day	The lower of 55dB LAeq,5min or 10dB below existing LAeq,5min Without entertainment noise	56dB to 60dB LAeq,5min or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The lower of 61dB LAeq,5min or 2dB below existing LAeq,5min Without entertainment noise
Dwellings	Garden used for amenity (free field)	Evening	The lower of 50dB LAeq,5min or 10dB below existing LAeq,5min Without entertainment noise	51dB to 55dB LAeq,5min Or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The lower of 56dB LAeq,5min Or 2dB below existing LAeq,5min Without entertainment noise
Dwellings	Garden used for amenity (free field)	Night	The lower of 45dB Aeq,5min Or 10dB below existing LAeq,5min Without entertainment noise	46dB to 50dB LAeq,5min Or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The lower of 51dB LAeq,5min Or 2dB below existing LAeq,5min Without entertainment noise

Noise levels applicable to proposed entertainment premises and for proposed residential premises near existing entertainment premises (entertainment noise)

Objectives

For premises where entertainment takes place more than once per week music and associated sources should not be audible inside noise-sensitive property at any time.

For premises where entertainment takes place less frequently than once per week, music and associated sources should not be audible inside noise-sensitive property between 23:00 and 07:00 hours.

For the purposes of this document, airborne noise may be considered not audible when it is at a low enough level such that it is not recognisable as emanating from the source in question and it does not alter the perception of the ambient noise environment that would prevail in the absence of the source in question.

Design criteria

For the airborne transmission of entertainment noise, the following noise rating curves (NR) measured as a 5 minute linear Leq are regarded as meeting the above objectives:

Room	Noise rating curve	Design period
Bedrooms	NR 10 Leq 5 mins	23:00-07:00hrs
All habitable rooms	NR 20 Leq 5 mins	07:00-23:00hrs

The above design criteria apply to the airborne transmission of entertainment noise. The structure borne transmission of noise is regarded as more problematic as the noise tends to take on much more low frequency bias as it propagates through the structure and the noise is often radiated simultaneously from multiple elements of the structure e.g. floors, walls and ceilings, leading to an all-encompassing surrounding sense of perception; in addition structure borne noise can often be perceived as vibration as well as sound, adding to the adverse effect. Consequently, where there is a risk of structure borne transmission of entertainment noise to sensitive premises we may seek more stringent criteria than for airborne entertainment noise. Developers are therefore encouraged to consult with the council's environmental health department at an early stage in the consideration of the scheme to address this issue and to submit proposals to mitigate the risk for review.

Vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted or in line with the most up-to-date version of British Standard 6472

Appendix 6: Air Quality

This appendix provides additional information on air quality matters and aims to ensure the Local Plan is consistent with London Local Air Quality Management (LLAQM) and wider approaches in London. It provides further details and guidance to support the policies contained

in this Local Plan and sets out the basis for which air quality is a material planning consideration in the determination of relevant planning applications. This appendix should be read in conjunction with Policy CG9 – Air quality.

1.1 Air Quality and Planning

All major developments must submit the following documents in preparation of a planning application:

- Air Quality Assessment (AQA)
- Air Quality Neutral Assessment (AQN)
- Air Quality Positive Statement
- Dust Management Plan (DMP)

Depending on the size, minor developments may also require an Air Quality Neutral Assessment.

1.2 Reducing exposure through design

Considerate design can avoid potential impacts on air quality from the earliest stages. The design and layout of buildings influences exposure to poor air quality.

Wider sustainable design principles that reduce energy use and

demand also reduce the potential emissions from buildings, and involve energy efficiency measures, retrofitting where appropriate, pollution control and urban greening. The remaining energy demand is therefore more likely to be met using zero- or low-emission sources.

1.2.1 Form, layout, and orientation

Increased dispersion of pollution can be achieved through suitable form, layout and orientation of buildings and developments. Exposure to poor air quality is minimised through increasing distances between the source (such as roads, railways, and large combustion facilities) and the receptor (i.e. places where human exposure is most likely to occur). This is especially important for sensitive land uses (hospitals, schools, children's playgrounds etc.).

1.2.2 Ventilation

Ventilation systems should account for the impact of ambient air pollution on indoor air quality, such as through the location of air intakes away from sources of poor air quality (such as at roof level and away from exhaust flues). It may be more appropriate to locate less sensitive land uses (such as commercial units) at ground level, where exposure to roadside air pollution is more likely to be transient.

Where filtration systems are incorporated into mechanical ventilation to ensure good air quality, it is important that their efficacy is supported by suitable evidence and that they do not result in significant increased energy demand, in line with Policy CG2 – Low energy buildings.

Sealed windows and façades should only be employed to mitigate poor air quality as a last resort and must ensure compliance with Policy CG5 – Overheating.

1.2.3 Outdoor and recreation space

The location of outside space is an important consideration, due to exposure arising from gardens, balconies, playgrounds, and roof terraces. Exposure in outdoor spaces may be screened through the use of green infrastructure.

Similarly, the location of flues and exhaust vents in relation to recreational areas, such as roof terraces or gardens, is an important consideration.

1.2.4 Public realm

Public realm proposals have the opportunity to reduce exposure to poor air quality and encourage people to spend time away from polluted areas. It is therefore advantageous for development proposals that incorporate public realm improvements to use design, where possible, to improve pedestrian and cyclist connectivity, encourage routes away from busy roads and reduce severance.

Public realm areas for recreation, seating and exercise may be screened from sources of pollution, either by distance or by the appropriate use of green infrastructure. The Mayor of London and Air Quality Expert Group (AQEG) have produced guidance on incorporating green infrastructure to improve air quality.

1.3 Heating and energy supply

The adoption of technologies to generate heat and energy from efficient and/or renewable sources can minimise air pollution emissions. This is due to the technologies either not requiring combustion or, in the case of district heating, being more efficient at heating than individual boilers. Such technologies can include solar water heating, connection to heat

networks, heat pumps (air-source or ground-source) and/or photovoltaic panels. These technologies therefore give rise to lower emissions of local pollutants and hence improve air quality locally.

1.3.1 Generators

Diesel generators produce high emissions of NO_x and particulate matter and can lead to adverse impacts on both long- and short- term concentrations of air pollutants. Generators are often installed for emergency or life safety purposes, but may also be proposed for

business continuity (such as for large offices and data centres) or short-term operating reserve (STOR) power for the National Grid.

Where a secondary electric power supply cannot be assured, alternative technology to diesel generators (such as battery, fuel cell or gas-fired alternatives) are preferable in terms of air quality. Where permanent diesel generators are installed, these will be required to meet relevant emissions standards and are typically only used for emergency and life safety purpose, and associated maintenance and testing.

Where generators are proposed for any other purpose, it would be important to carry out a full assessment of their impact on local air quality, and to determine whether secondary abatement of emissions is required. Diesel generators proposed for any purpose other than

emergency or life safety use will not meet air quality neutral benchmarks due to their emissions of particulate matter. Proposals for generators to provide short-term supply to the National Grid are very location dependent.

It is preferable for construction sites to seek a temporary electricity supply connection to reduce the need for diesel generators. Any on-site diesel plant will need to meet the NRMM Low Emission Zone standards.

1.3.2 Combustion flues

Should combustion plant be installed, consideration of the flue location and discharge velocity is required at the planning stage to ensure appropriate provision has been made.

Flues should be designed to ensure adequate dispersion of pollutants, and where an Air Quality Assessment is undertaken flues should be included. For smaller or simpler developments it may be sufficient

to demonstrate that the flue terminates at least 1m above the tallest building, and is free of surrounding structures, cowls or caps which may reduce dispersion. Consideration must also be given to the neighbouring and proposed buildings, including outdoor amenity space.

Clean Air Act Chimney height approval needs to be sought where a furnace is burning liquid or gaseous matter at a rate of 366.4 kW or greater or burning pulverised fuel or any solid matter at a rate of more than 45.4 kg per hour. Where an Air Quality Assessment is required the chimney height approval should normally be incorporated in the assessment for the development.¹

1.4 Traffic reduction

Emissions from road traffic are the dominant source of elevated pollutant concentrations in London. Infrastructure to make active travel and public transport the most desirable modes is supported by the Mayor's Transport Strategy, the London Plan, Local Implementation Plans and Local Plans.

Measures to reduce private vehicle use may be implemented at a borough level, and may include the following:

- Car-free developments and maximum parking standards
- Workplace parking policies
- Requirement for parking space leasing
- Secure, covered, accessible cycle parking standards
- Green travel plans
- Provision of car club bays.

1.5 Construction phase

Construction and development can have a negative impact on people and the environment. This impact can be minimised if the development is properly managed.

All construction works should be carried out in line with The Control of Dust and Emissions During Construction and Demolition SPG July 2014 (GLA) and the Tower Hamlets Code of Construction Practice (CoCP) to avoid air pollution and dust nuisance.

The Control of Dust and Emission during Construction and Demolition SPG sets out measures to control emissions associated with construction and demolition, and other up-to-date guidance is produced by relevant bodies such as the IAQM.

All four construction sub-phases (demolition, earthworks, construction, and trackout) of major developments will have to be assessed from a

¹ The Clean Air Act Memorandum on Chimney Heights (1981) and Technical Guidance Note (Dispersion) D1 1993 are applicable primarily to short term impacts and not for considering annual mean nitrogen dioxide concentrations.

dust magnitude perspective, by submitting the Dust Risk Assessment of the site. Based on the sub-phase classification, dust monitoring will consist of:

- Visual assessments for a small construction sub-phase category
- The installation of PM10 real time automatic monitors for a medium or large construction sub-phase category. Parameters to be monitored, duration, locations and monitoring techniques must be approved in writing by the London Borough of Tower Hamlets prior to commencement of monitoring.

Furthermore, for medium or large construction sub-phase categories the following details shall be submitted:

- Total number and location of PM10 continuous monitoring stations, model/brand, air quality consultant responsible for downloading the data and preparing the air quality reports.
- PM10 monitoring must be undertaken for three months before construction works shall start. Monitoring shall continue during and after the construction movements.
- The worksite shall have the following Air Quality Trigger levels:
 - a 'red' alert of 190µg/m³ set as a 1-hour mean for concentrations of PM10
- The worksite shall have automatic alerts direct to the site manager so that when dust levels breach the acceptable limits, action can be taken swiftly and effectively. When a trigger alert is received, the project manager or the appropriate person(s) shall review the activities to identify any potential dust or particulate sources. If the cause of the trigger alert relates to site activity, mitigation shall be put in place immediately. When the trigger alert is exceeded, PM10

monitoring units shall send alerts (emails and/or text messages) to the project manager or the appropriate person(s). Tower Hamlets Pollution Team shall also be notified.

- Notification to Tower Hamlets Pollution Team following a trigger alert:
 - The project manager shall, as quickly as practicable, investigate activities on the site to ascertain any visible dust is emanating from the site and identify activities occurring without adequate dust control measures implemented.
 - If it is identified that the cause of the alert relates to the worksite activity, mitigation shall be put in place immediately to reduce impacts.
 - Details of the alert, investigation and actions taken shall be recorded in the site logbook and the Tower Hamlets Pollution Team shall be notified of the event. Within 24 hours of a 190µg/m³ exceedance, an email to Environmental.Protection@towerhamlets.gov.uk shall be sent by completing the appropriate form 'Daily Air Quality Exceedances form – Tower Hamlets Council'. The site logbook shall be available to Tower Hamlets Council too.
 - If no source of the dust event is identified on site, and/or if the cause of the alert is not related to site operations, the outcome of any investigation shall be recorded in the site logbook and reported to Tower Hamlets Pollution Team through the form available on the council website.
 - For the entire construction/demolition works monitoring duration, monthly air quality monitoring report shall be sent to Environmental.Protection@towerhamlets.gov.uk within the first week of the following month. The monthly report shall include Quality Assurance (QA) and Quality Control (QC) information regarding the monitoring units.

2 Air Quality Assessments

An air quality assessment (AQA) is designed to ensure that development proposals do not result in unacceptable impacts on local air quality or introduce new exposure into areas of poor air quality. They will also outline how development proposals accord with relevant planning policy and any mitigation measures required to make the proposed development acceptable in planning terms.

2.1 Scoping the need for an assessment

An AQA is required to accompany any major planning application, to show how a development meets the requirements of London Plan Policy SI 1 and Local Plan Policy CG9. An air quality assessment is also required for minor developments if future residents, users, or occupants may be exposed to poor air quality.

AQAs consider all stages of the development process, including impacts during the demolition and construction phases. Guidance for the assessment of construction and demolition impacts is set out in the Mayor of London's Control of Dust and Emissions during Construction and Demolition SPG.

The Institute of Air Quality Management (IAQM) has produced several guidance documents on carrying out air quality assessments, including for more specific air quality considerations, which should also be referred to when carrying out air quality assessments:

- Land-Use Planning & Development Control: Planning for Air Quality
- Impacts on designated nature conservation sites
- Assessing odour for planning
- Assessing mineral dust impact for planning

2.2 Contents of an air quality assessment

The scope of an air quality assessment usually includes:

- An assessment of the existing baseline air quality in the vicinity of the proposed development.
- Identification of the opportunities and constraints on the site, and what measures can be taken at the design stage to avoid the need for mitigation later.
- Predictions of the future impact of the development, comparing the future scenario with and without the proposed development, but including all cumulative (consented) development.

An AQA should include the following:

- Site location and brief description of the proposed development, and how it relates to existing air quality.
- Outline of the relevant planning and air quality policy (including odour and dust when appropriate).
- Description of the assessment methodology with appropriate data presented, to allow decision makers to assess the technical quality of the work and the assumptions underlying any model adjustments or verification factors.
- Location and description of all receptors used in the assessment, including any particularly sensitive receptors (residential properties, schools, hospitals etc.) and may include ecological receptors.
- Assessment of the baseline air quality/dust conditions in the vicinity of the proposed development, and a description of all nearby sources of pollution likely to impact on the development, including emissions from nearby energy plant (boilers/CHP) and industrial installations where necessary.

- Prediction of the impact of the proposed development on local air quality, including
 - description of the impacts at individual receptors;
 - description of likely changes in air quality conditions as a result of the development, including any exceedances of the air quality objectives/air quality assessment levels which are created or sustained by the development;
 - consideration of emissions from all sources, including combined impacts road traffic and energy plant.
- Prediction of the exposure of future residents, occupants, or users of the proposed development, including contour maps of pollutant concentrations where appropriate.
- Description and quantification of further mitigation measures required to make the development acceptable in air quality terms.
- An assessment of the significance of the impacts after mitigation.
- An assessment of the cumulative impacts with other development during construction and operation.
- A statement as to whether the development is or is not consistent with relevant policy,.
- Conclusion of the assessment

Section 6 and 7 of the EPUK/IAQM 'Planning for air quality' guidance gives more in-depth information on how to address the requirements listed above.

Air quality assessments carried out using realistic worst-case assumptions to minimise the uncertainty in the outcomes are considered most robust. If certain parameters are unknown or uncertain, this ensures that the results of the assessment are conservative in nature.

Air quality assessments should also take into account the cumulative air quality impacts of other development, including developments that are under construction or have been granted planning permission in the vicinity of the proposed development, where practicable.

Early consultation with the air quality officer is recommended to ensure that the methodology of the air quality assessment is agreed, and that all relevant local considerations and cumulative development are accounted for.

2.3 Construction phase assessments

Information on the assessment and mitigation of air quality and dust impacts during the construction phase is provided in the Mayor of London's Control of Dust and Emissions during Construction and Demolition SPG.

2.3.1 Construction Dust Risk Assessment

A construction dust risk assessment is an assessment of the risk of dust and PM10 impacts from a construction site. It considers the risk of impacts from demolition, earthworks, and construction, as well as from dirt and dust tracked out onto the highway from construction vehicles (track out). The construction dust risk assessment will inform the level of mitigation to be implemented over the duration of the construction works.

A construction dust risk assessment should be carried out in accordance with Chapter 3 and Chapter 4 of the Control of Dust and Emission during Construction and Demolition SPG.

2.3.2 Air Quality and Dust Management Plan (AQDMP)

The AQDMP outlines the measures and protocols which will be

implemented to reduce the impacts of dust and PM10 during the construction works and will reflect the outcomes of the construction dust risk assessment. It may also outline the dust and particulate matter monitoring protocols to be implemented on-site.

The AQDMP should be prepared in accordance with the requirements in Chapter 5 of the Mayor of London's SPG.

2.3.3 Non-Road Mobile Machinery (NRMM)

NRMM includes mobile machines and transportable industrial equipment or vehicles which are fitted with an internal combustion engine and not intended for transporting goods or passengers on roads. NRMM, particularly from the construction sector, can be a significant contributor to London's air pollution.

All NRMM on construction sites, with a power rating between 37 kW and 560 kW, will be required to meet the emissions standards of the NRMM Low Emission Zone by planning condition. These emissions standards are based on those defined for both variable and constant speed engines in EU Directive 97/68/EC and its subsequent amendments, for both NOx and PM.

The current standards are Stage IV for construction machinery operating in the Central Activities Zone and Opportunity Areas (including Canary Wharf) and Stage IIIB in the rest of London. Stage IV standards will apply throughout London from 1st January 2025, and Stage V from 2030.

Prior to commencement of works, all NRMM must be registered on the NRMM register, which can be accessed at www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/nrmm. A number of exemptions also apply to individual pieces of equipment.

Produced by:

Plan Making Team

Planning and Building Control
Housing and Regeneration

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Mayor's foreword

It is with great pleasure that I announce the production of a new draft Local Plan for the borough of Tower Hamlets. This is a critical step for our community at a time when we face some of the most significant challenges in our history. We need to respond to the cost-of-living crisis, ensure that we provide sufficient new homes and infrastructure to address the issue of overcrowding, particularly affecting our most vulnerable residents.

As the fastest growing local authority in the country, with the highest housing target and youngest average age, all within one of London's smallest geographical boundary areas (7.6 square miles), it is vital that we plan for sustainable development that is equitable and provides opportunities for future generations.

This Local Plan will provide a blueprint for the future of Tower Hamlets, enabling us to deliver new homes, infrastructure, employment opportunities, and support for our town centres while moving towards a cleaner, greener future. The new Local Plan aligns with our council's Strategic Plan and its priorities for investment in public services and improving the lives of our residents.

The process of creating the new Local Plan for Tower Hamlets began in January 2022 and has involved early engagement with our communities to gather views and opinions. This has given us invaluable insights into the hopes and aspirations of our residents for the future of our borough and what they would like to see included in a new Local Plan.

The ideas and ambitions submitted by our communities, alongside the preparation of robust evidence base documents, have informed the creation of this first draft of the Local Plan. It contains a policy framework and strategy designed to address the challenges and opportunities facing our borough and its people.

We remain committed to listening to our residents and stakeholders and encourage everyone to participate in the production of the Local Plan and share your thoughts. We welcome feedback during this consultation period where together, we can create a Local Plan that reflects the needs and aspirations of our communities and helps us build a brighter future for all in Tower Hamlets.

We have a unique opportunity to build a vibrant and successful future for Tower Hamlets that benefits all residents, regardless of background or circumstances. With the production of this new Local Plan, we are taking the lead in ensuring that we build our Borough to benefit present and future generations. Together, we can make Tower Hamlets a place where everyone can thrive.

ময়েরে ভূমিকা

অত্যান্ত আনন্দে সঙ্গু আমাটাওয়ার হ্যামলেটেস বরো-এর জন্য একটি নতুন খসড়া স্থানীয় পরিকল্পনা (লোকাল প্ল্যান) তৈরি ঘোষণা দিচ্ছি। এটি এমন একটি সময়ে আমাদের কমিউনিটিগুলির জন্য একটি গুরুত্বপূর্ণ পদক্ষেপে যখন আমরা আমাদের ইতিহাসে সবচেয়ে গুরুত্বপূর্ণ চ্যালেঞ্জগুলির মুখোমুখি হয়েছি। আমাদেরকে জীবনযাত্রার ব্যয়রে সংকটকে মোকাবিলা করতে হবে, নশিচতি করতে হবে যে আমরা যেনো অভ্যর্থনা উভি তথা জায়গার তুলনায় অতিরিক্ত লোকজনরে বসবাসজনতি সমস্যা, বিশেষত যা আমাদের সবচেয়ে ভুগুর আর ঝুঁকিপূর্ণ বাসনিদাদরে প্রভাবতি করে, সমাধানরে জন্য পর্যাাপ্ত নতুন বাড়ি এবং অবকাঠামো প্রদান করি।

লন্ডনরে কল্পদ্রতম ভৌগোলিক সীমানা এলাকার (৭.৬ বর্গমাইল) মধ্যে সর্বোচ্চ আবাসন লক্ষ্যমাত্রা এবং সর্বকনিষ্ঠ গড় বয়সসহ দশেরে দ্রুততম কর্মবর্ধমান স্থানীয় কর্তৃক হিসাবে, এটি গুরুত্বপূর্ণ যে আমরা টেকসই উন্নয়নরে জন্য যেনো এমন একটি পরিকল্পনা করি যা ন্যায়সঙ্গত এবং ভবিষ্যৎ প্রজন্মগুলির জন্য সুযোগ প্রদান করে।

এই স্থানীয় পরিকল্পনা টাওয়ার হ্যামলেটেসরে ভবিষ্যতরে জন্য একটি চূড়ান্ত পরিকল্পনা প্রদান করবে, যা আমাদের পরচিহ্নন, সবুজ ভবিষ্যতরে দিকে অগ্রসর হওয়ার সময় আমাদের শহর কেন্দ্রগুলির জন্য নতুন বাড়ি, অবকাঠামো, কর্মসংস্থানরে সুযোগ এবং সহায়তা যোগাতে সক্ষম করবে। নতুন স্থানীয় পরিকল্পনা আমাদের কাউন্সিলরে কৌশলগত পরিকল্পনা এবং পাবলিক সার্ভিসগুলিতে বিনিয়োগ এবং আমাদের বাসনিদাদরে জীবনযাত্রার উন্নতির জন্য এর অগ্রাধিকারগুলির সাথে সামঞ্জস্যপূর্ণ।

টাওয়ার হ্যামলেটেসরে জন্য নতুন স্থানীয় পরিকল্পনা তৈরি প্রক্রিয়াটি ২০২২ সনরে জানুয়ারী মাসে শুরু হয়েছিল এবং তা দুইটি ভিডিও এবং মতামত সংগ্রহরে জন্য আমাদের কমিউনিটিগুলির সাথে প্রাথমিক সম্পৃক্ততাকে জড়িত করেছিল। এটি আমাদের বরোর ভবিষ্যতরে জন্য আমাদের বাসনিদাদরে আশা এবং আকাঙ্ক্ষাসমূহ এবং তারা একটি নতুন স্থানীয় পরিকল্পনায় কী অন্তর্ভুক্ত দখেতে চান সে সম্পর্কে অমূল্য অন্তর্দৃষ্টি দিচ্ছে।

আমাদের কমিউনিটিগুলির দ্বারা জমা দেওয়া ধারণা এবং উচ্চাকাঙ্ক্ষাসমূহ, শক্তিশালী

প্রমাণভিত্তিক নথিপত্র প্রস্তুত করার পাশাপাশি, স্থানীয় পরিকল্পনার এই প্রথম খসড়া তৈরি বিষয়ে তথ্য প্রদান করেছে। এতে একটি নীতি কাঠামো এবং কৌশল রয়েছে যা আমাদের বরো এবং এর জনগণরে মুখোমুখি চ্যালেঞ্জ এবং সুযোগগুলি মোকাবিলা করার জন্য উপযোগী করে সাজানো হয়েছে।

আমরা আমাদের বাসনিদাদরে এবং স্ট্রেকহোল্ডারদের (শরিকানদের) কথা শুনতে প্রতশ্রুতবিদ্ধ এবং সবাইকে স্থানীয় পরিকল্পনা তৈরিতে অংশ নতে এবং আপনার চিন্তাভাবনা ভাগ করে নতে উত্সাহতি করি। আমরা এই সলাপরামর্শ তথা কনসালটেশনরে সময়কালে সাড়ামূলক মতামতকে স্বাগত জানাই যখনে একসাথে, আমরা একটি স্থানীয় পরিকল্পনা তৈরি করতে পারি যা আমাদের কমিউনিটিগুলির চাহিদা এবং আকাঙ্ক্ষাগুলিকে প্রতফিলতি করে এবং টাওয়ার হ্যামলেটেসে সকলরে জন্য একটি উজ্জ্বল ভবিষ্যৎ গড়ে তুলতে সহায়তা করে।

টাওয়ার হ্যামলেটেসরে জন্য একটি প্রাণবন্ত এবং সফল ভবিষ্যত গড়ে তোলার জন্য আমাদের এমন একটি অনন্য সুযোগ রয়েছে যা পটভূমি বা পরিস্থিতি নির্বিশেষে সকল বাসনিদাদরে উপকৃত করে। এই নতুন স্থানীয় পরিকল্পনা তৈরি মাধ্যমে, আমরা বর্তমান এবং ভবিষ্যৎ প্রজন্মদের উপকাররে জন্য আমাদের বরো গঠনে নেতৃত্ব দিচ্ছি। একসাথে, আমরা টাওয়ার হ্যামলেটেসকে এমন একটি জায়গায় পরিণত করতে পারি যখনে সবাই সাফল্য আর সমৃদ্ধলাভ করতে পারে।



Lutfur Rahman

Executive Mayor of Tower Hamlets

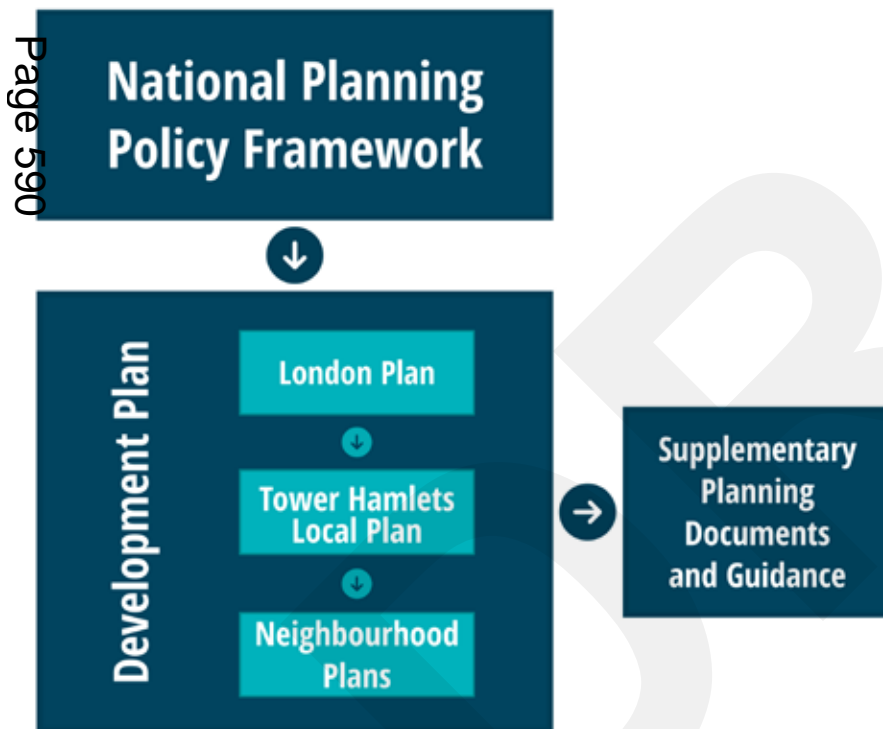


Introduction

This is the first draft version of a new Local Plan for Tower Hamlets that is being consulted upon in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

1. What is the Local Plan?

Figure 1: The Local Plan in relation to other planning documents



1.1 A Local Plan is a spatial strategy that sets out a vision and objectives, planning policies, and site allocations that respond to the challenges that local communities are facing and promote sustainable development in the borough. It is a planning policy framework that guides and manages development in the borough over a period of 10-15 years.

1.2 A Local Plan will be prepared by a Local Planning Authority and must be developed in line with planning policy requirements set out by national and regional government as well as in consultation with the local community.

1.3 An up-to-date local plan with a clear vision, objectives, and planning policies will ensure the most appropriate development decisions and address the needs and opportunities of an area. In practice, the Local Plan will provide a guide as to what can be built where, how infrastructure investments should be shaped, and determining the future development pattern for Tower Hamlets.

1.4 The Local Plan, together with the London Plan and Neighbourhood Plans, will form the statutory Development Plan framework for Tower Hamlets and be used to assess all planning applications.

1.5 The process of developing a Local Plan starts with engaging the community which the council commenced in January 2023. Once the document is drafted, statutory consultation takes place under Regulation 18 after which there is another round of drafting. This updated version of the document is submitted to the Secretary of State under Regulation 19, alongside any final comments or 'representations'. If the Secretary of State deems the document to meet the basic legal requirements, an Independent Inspector will be appointed to undertake and examination in public of the draft Local Plan.

Figure 2: Key stages of the plan making process, highlighting the current stage of production



2. Why is a new Local Plan being produced?

2.1 All Local Planning Authorities are required by the National Planning Policy Framework to have an up-to-date Local Plan. Without an up-to-date Local Plan, Tower Hamlets would see a reduced ability to apply local discretion on deciding planning applications. A new Local Plan will ensure a better understanding of current needs, address known and emerging challenges and make the most of the borough's unique assets and opportunities.

2.2 The council's current Local Plan "Managing growth and sharing the benefits", was adopted in 2020. It provides the planning policy framework for the borough up to 2031. However, specific objectives, policies and guidance contained in, and informing the Plan, may be considered outdated, particularly due to changes in national and regional guidance, in particular the London Plan (2021), new Levelling Up & Regeneration Bill and the draft consultation National Planning Policy Framework.

2.3 Of particular importance is ensuring that a new Local Plan for the borough best responds to the needs and aspirations of the local community, responding to the impacts from the COVID-19 pandemic and cost of living pressures, and providing the best opportunity for local residents to thrive in Tower Hamlets.

2.4 A new Local Plan will also need to consider and plan for parts of the borough where the planning powers are currently held by the London Legacy Development Corporation (LLDC) planning authority. This includes the areas of Fish Island, Hackney Wick and Bromley by Bow. The planning powers of this area will be handed back to the



relevant boroughs, including Tower Hamlets, by December 2024 as agreed by the Mayor of London.

2.5 Cumulatively, these trends, challenges, and opportunities will have a significant impact on the borough's housing, employment, town centres, infrastructure, and environment for the next 15 years. As a result, the council has committed to the preparation of a new Local Plan as a priority to respond to these changes. The council will continue to take a leadership role in planning positively for the borough and ensuring equality of opportunity.

3. What are the statutory requirements in developing a Local Plan?

3.1 The draft Tower Hamlets Local Plan has been prepared within the wider planning framework which provides the context for the document and sets requirements for the plan making process, the structure and contents of local plans and how a vision, policies and site allocations should be implemented.

Legislative framework:

3.2 The Planning and Compulsory Purchase Act 2004 is the primary legislative act that provides the basis for the plan-led system in England. It is supported by other legislative instruments, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the council to prepare and adopt the Local Plan and other supporting documents.

National guidance:

3.3 The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework (NPPF) (2021). This sets out the Government's planning policies for England and how they should be applied. It includes requirements for the preparation of local plans and is also a material consideration in the decision-making process for planning applications.

3.4 Local plans are independently examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are 'sound'. Plans are 'sound' if they are:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

3.5 The NPPF is supported by National Planning Practice Guidance (NPPG) which contains further detail on the plan-led system, decision-making, consultation, appraisals, and process-related requirements.

Regional framework:

3.6 The Local Plan must also be in general conformity with regional planning policies. For Tower Hamlets and all Greater London Boroughs, this is provided within the London Plan, which is produced by the Mayor of London and is referred to as the 'Spatial Development Strategy'. This hierarchy ensures a considered, balanced, and consistent approach to planning across all boroughs. The London Plan forms part of the Tower Hamlets development plan, meaning it must be taken into account in planning decisions. The London Mayor also prepares London Plan Guidance (LPG) documents that support implementation of the London Plan.

4. What informs the development of the Local Plan?

Evidence base

4.1 To support policies and site requirements, robust and justifiable evidence must be produced. This will ensure that the Local Plan is considered sound and best represents the community's interest. Evidence base documents will consider market trends, population projections, on-site realities, expert input, and a range of quantitative and qualitative data to provide the best available information. The evidence has been prepared by either the council or other organisations including government bodies and comprises research studies, technical data strategies, site masterplans and other technical information to cover the wide range of local plan policy areas. The evidence has also incorporated findings from the 2021 Census data that has been released to date. Growth and population projections have been informed by the Greater London Authority's updates and releases.

4.2 A series of evidence base documents have been completed or are under production – these will be listed throughout the document for each relevant section and policy area. Completed documents and/or interim reports are available on the council's 'Let's Talk' consultation platform.



Integrated Impact Assessment

4.3 The preparation of a new local plan must be continuously assessed in relation to potential social, economic, and environmental impacts. A series of impact assessments have been conducted throughout the Local Plan process to ensure impacts are mitigated, avoided and provide alternative options. These assessments have considered sustainability objectives, health, equalities, habitats regulation, and community safety. All of these assessments will be continued through the whole Local Plan process and will be updated in later consultation stages. An Integrated Impact Assessment that has appraised this Regulation 18 draft new Local Plan is available on the council's 'Let's Talk' consultation platform.

Viability

4.4 Local plans must be assessed in relation to their economic/ financial viability as to whether they are deliverable. This includes assessing the policies and site requirements provided within a local plan and considering how feasible it is for development opportunities to deliver what is being asked.

Duty to cooperate

4.5 The Localism Act (2011), subsequent regulations and the NPPF place a duty on local planning authorities to cooperate with neighbouring boroughs and other statutory bodies when preparing, or supporting the preparation of policies which address strategic matters. Tower Hamlets has and will continue to work positively with neighbouring boroughs and other relevant public bodies to identify and address issues of strategic importance during the preparation and implementation of the new Local Plan.

Consultation and engagement

4.6 There will be three main engagement/consultation stages as part of the Local Plan process. These stages provide an opportunity for all community members and stakeholders to provide feedback on what a new local plan should include, whether initial ideas and concepts are right, whether the themes are consistent with community aspirations or if anything has been missed. All feedback will be reviewed in detail and used to inform the next stages of the Local Plan process.

5. Consultation and engagement

5.1 The draft Local Plan has been developed together with all key stakeholders including with the Mayor of Tower Hamlets, elected councillors, local residents, neighbourhood forums, community groups, landowners, developers, and statutory bodies.

5.2 Early engagement on the new Local Plan was a non-statutory consultation event, running from Wednesday 25 January 2023 until Wednesday 8 March 2023. It consisted of:

- Digital engagement materials:
 - Details on the Tower Hamlets website;
 - Let's Talk Tower Hamlets consultation page;
 - ArcGIS StoryMap platform;
 - PDF engagement documents;
 - Google Forms survey;
 - Word document version of survey; and
 - Social media.
- Emails to mailing list and stakeholders, including residents, consultees, and councillors.
- Public events:
 - 3 webinars;
 - 2 online drop-in sessions;
 - 2 in-person drop-in sessions; and
 - In-person public engagement sessions.

- Flyers and posters at Idea Stores and libraries; flyers handed out on streets.

5.3 Following the early engagement, consultation in accordance with Regulation 18 of the Town and Country (Local Planning) (England) Regulations 2012, was undertaken for a six week period from 6th November to 18th December 2023. The purpose of the Regulation 18 consultation was to gain feedback on the new draft policies, including their suitability and potential impacts. This engagement process included:

- Digital engagement methods:
 - A dedicated webpage in the council's consultation portal;
 - A mapping and survey system called StoryMaps;
 - Online drop-in and webinar events.
- Emails to mailing list and stakeholders, including residents, statutory consultees, and councillors.
- Public events:
 - Six in person presentations covering different themes and geographic areas;
 - Drop-in sessions at the Town Hall; and,
 - Attendance at meetings of community organisations.

5.4 The feedback and input received from the above processes significantly contributed to the preparation of this draft Local Plan. Early engagement and Regulation 18 submissions both came from a wide range of respondents. These included key stakeholders in the borough, both those listed under the specific and general consultation bodies in the council's statement of community involvement and the wider public.

There was significant involvement from residents and individuals who live and/or work in the borough, producing a diverse sample of views and experiences of Tower Hamlets.

5.5 A summary of the early engagement for the new Local Plan can be found at <https://talk.towerhamlets.gov.uk/local-plan>.

5.6 A summary of the Regulation 18 consultation for the new Local Plan can be found [here](#).

6. How to get involved in the Regulation 19 stage of the Local Plan process

6.1 The Draft Local Plan has been published by Tower Hamlets Council Local Planning Authority (LPA) in order for responses to be made on it before it is submitted for examination by a Planning Inspector.

6.2 In complying with the stages and requirements for producing a Local Plan, as prescribed by national policy, legislation, and through the council's own Statement of Community Involvement, the council will ensure a comprehensive and robust Regulation 19 consultation which looks to test the soundness of the proposed submission document against the four criteria set out in national guidance.

6.3 At this stage of the plan making process, in accordance with national guidance, it is requested that consultation responses focus on legal and procedural compliance, mainly the soundness of the Draft

Local Plan and the duty to cooperate. There are four tests of soundness which require the Draft Local Plan to be:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

6.4 All relevant information relating to this stage of consultation, including the Draft Local Plan, supporting documents and a model representation form can be found on the council's website. Hard copies of the Local Plan and the model representation form will also be available at the Town Hall and Idea Stores and libraries across the borough for inspection.

6.5 You can review the Draft Local Plan to understand its contents and supporting evidence base by:

- Visiting the dedicated Let's Talk page ([insert link](#));
- Using our interactive StoryMap ([insert link](#));
- Speaking to officers of the council, visiting the Town Hall, libraries, or Idea Stores; and,
- Attending an in-person or online event;

6.6 If you wish to make a response seeking a modification the Local Plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria above. You can make a formal response on the soundness of the Draft Local Plan by:

- Completing and submitting response form on our Let's Talk page;
- Submitting a response to localplan@towerhamlets.gov.uk; and,
- Submitting a written response to the Plan Making Team, Housing and Regeneration, Tower Hamlets Town Hall, 160 Whitechapel Road, London, E1 1BJ

6.7 Your representation should be supported by evidence wherever relevant. It will be helpful if you also say precisely how you think the plan should be modified. To ensure an effective examination, it is important that the inspector and all other participants in the examination process are able to know who has made representations on the plan. Therefore, when completing the response form it is vital you provide your name and contact details.

6.8 You can help by:

- Forwarding information of this project to people, groups, or organisations you think may be interested;
- Making a post on social media to help spread the word; and
- Sharing feedback on how we're consulting on this project.

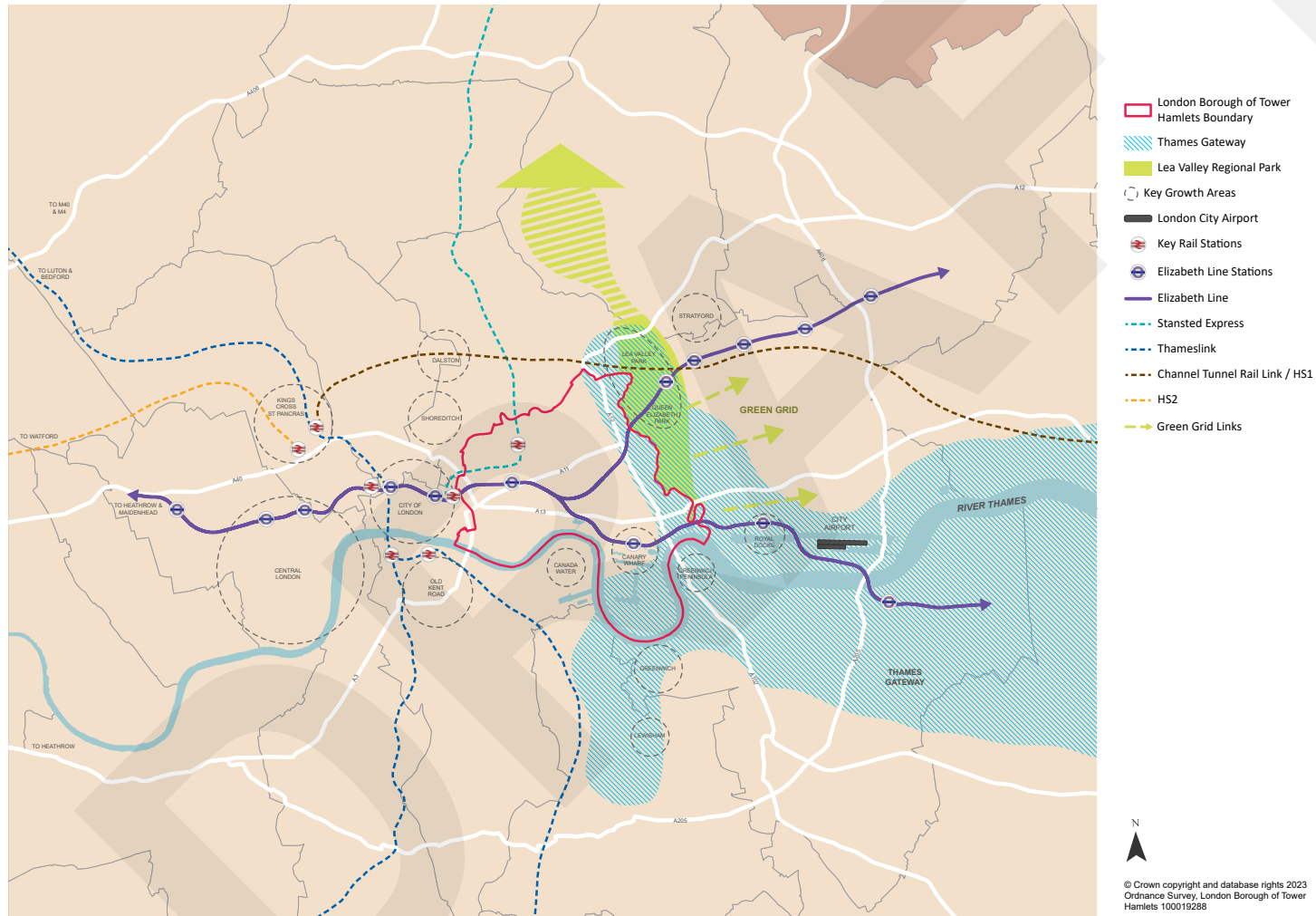
7. Next steps

7.1 Following the Regulation 19 stage and reflection on the contents of representations received the Draft Local Plan will be submitted to the Secretary of State for an Independent Examination in Public, along with all representations received. The Secretary of State will appoint a Planning Inspector who will consider all responses received at the Regulation 19 stage, examine the Draft Local Plan and decide whether it is sound and legally compliant. The Inspector may require modifications to the Local Plan and will decide whether or not to recommend adoption of the Local Plan.



Setting the Scene

Figure 3: Strategic location map, showing Tower Hamlets in the wider context.



8. Setting the scene

8.1 This chapter provides an overview of Tower Hamlets, its people, economy, housing profile, indicators of deprivation, built form, environment, and town centres. It highlights how the borough is a microcosm of London, having the fastest population growth in the country and having always been a gateway for people of all backgrounds to live, work, and visit the borough.

8.2 Tower Hamlets is a dynamic and exciting borough with a wealth of opportunities for businesses, residents, and visitors alike. With its diverse population, rich history, and thriving economy, Tower Hamlets truly is a unique and exciting location to live, work, and visit.

History

8.3 Tower Hamlets is a borough with a rich and dynamic history, with evidence of Roman settlements and Viking invasions. The 19th century marked a pivotal moment for the borough as it became a prominent hub for shipping and manufacturing industries. However, the area suffered extensive damage during World War II, leading to significant regeneration and the establishment of many migrant communities. Encompassing much of the traditional East End of London, Tower Hamlets has emerged as a focal point for London and the UK, strategically located within the wider south-east region of England.

Context

8.4 Covering approximately 7.63 square miles, Tower Hamlets shares borders with several London boroughs, including the City of London to the west, Hackney to the north, and Newham to the east, as well as being bounded by the river Thames to the south. Neighbouring areas across the river include Lewisham, Southwark, and the Royal Borough of Greenwich. Tower Hamlets is renowned for its diversity and multiculturalism, with a vibrant cultural scene and numerous historical landmarks, including the iconic Tower of London and Tower Bridge.

8.5 Part of the borough (Fish Island, Hackney Wick, and Bromley-by-Bow) currently falls within the boundary of the LLDC, the local planning authority responsible for coordinating the growth and regeneration of the Queen Elizabeth Olympic Park and surrounding areas as part of the 2012 London Olympic Games legacy. The planning powers for this area will be passed back to LBTH by the end of 2024.

8.6 Tower Hamlets connectivity has been enhanced and the borough has been made even more attractive for businesses and residents alike, with the borough's transportation network receiving a significant boost with the long-awaited arrival of the Elizabeth line, with stations at Whitechapel and Canary Wharf.

Figure 4: Context map of the borough



People

8.7 From 2011 to 2021, the population of Tower Hamlets increased by 22.1% from 254,100 to 310,300. This marks a significant proportional increase and represents the fastest population growth of any local authority in England. This population increase together with the overall size of the borough has Tower Hamlets being recorded as the most densely populated local authority area in England with 15,695 residents per km², compared to the national average of 424 per km².

8.8 The borough has the youngest population profile of any local authority area across England where the average age sits at 30 years. Across the country, the overall average sits at 40 years. The number of people in Tower Hamlets aged 35 to 49 years rose by around 21,000 (an increase of 42.8%), while the number of residents between 75 and 84 years fell by just under 600 (10.5% decrease).

8.9 The rich, ethnic diversity of the Tower Hamlets population has continued with the 2021 Census data showing:

- The Bangladeshi population remains by far the largest in England by way of proportion (34.6%) and overall size (107,333).
- At 22.9% the White British population in Tower Hamlets is the fourth smallest in England and Wales behind Newham, Brent and Harrow.
- In 2021 there were 45,187 White Other residents in Tower Hamlets; 14.6% of the overall local population, a significant increase compared to 2011.
- In 2021, 6,180 residents identified as Somali or Somalilander, this is 2% of the overall population.

- The Black African population has increased; 5% of residents of Tower Hamlets identified as Black African which, at 5% of the local population is double the proportion of England and Wales as a whole (2.5%) but lower than the rate in London (7.9%).
- The local Chinese population in Tower Hamlets (3.3%) is the third highest proportion in England and Wales, behind City of London and Cambridge.
- Tower Hamlets has the fourth largest Roma population in England and Wales after Brent, Sheffield, and Newham (2,225 people identified as Roma in Tower Hamlets).

8.10 In 2021, 39.9% of people in Tower Hamlets described themselves as Muslim (up from 38.0%), while 22.3% described themselves as Christian (down from 29.8% the decade before). In 2021, 26.6% of Tower Hamlets residents reported having "No religion", up from 21.0% in 2011. The rise of 5.6 percentage points was the largest increase of all broad religious groups in Tower Hamlets.

8.11 73% of residents in Tower Hamlets reported that English is their main spoken language and an additional 20.7% of residents stated that, whilst it is not their main language, they can speak English well or very well. 6.2% of residents don't speak English well or at all. After English, Bengali is the most commonly spoken language in Tower Hamlets (11%) then Italian (2.2%) and Spanish (1.7%).



Deprivation and inequality

8.12 Tower Hamlets remains a borough of extremes and contrasts. Deprivation and poverty across the population is widespread. While there are pockets of affluence in locations proximate to the City Fringe, River Thames and Canary Wharf, there remains a significant disparity across a range of indicators related to education, overcrowding, income, and employment.

8.13 The council conducted a poverty review between March to June 2021. This review found that in 2019/20, 28 per cent of children in Tower Hamlets were living in a low-income family. Once housing costs are considered, 56% of children in Tower Hamlets were living in a low-income family - the highest level of child poverty in the England. 44% of older people in Tower Hamlets live in low-income households - the highest proportion in England. In 2018/19, 1.21% of Tower Hamlets households were estimated to be destitute. Tower Hamlets is in the 20 local areas in the country with the highest rates of destitution.

8.14 The 2022 local area statistics revealed that 15,385 (26.7%) children in Tower Hamlets were living in relative low-income families and 12,522

8.15 (21.8%) children in Tower Hamlets were living in absolute low-income families before housing costs - this is the second highest proportion among London Boroughs after the City of London (The City of London has a significantly smaller population size than any other local authority area given its location, commercial focus, and geographical area). These indicators of deprivation and inequality are contributed to by a number of factors, including:

- more families in Tower Hamlets have nobody in work than average, despite a decline in unemployment in recent years;
- a growing number of working families are on a low income - more than 3 in 4 children in poverty are in a family where at least one person works;
- the cost of living is high in the borough, particularly the cost of housing; and
- changes to the social security system mean that many people cannot afford essentials - larger families and lone parents with dependent children have been particularly affected.



Housing

8.16 Tower Hamlets plays an integral role in the strategic regeneration and development of Greater London, providing homes for the wider city, continually being measured against the highest housing targets across all London boroughs.

8.17 According to the March 2021 Census, Tower Hamlets had a total of 120,539 households. The majority (81%) of households in the borough live in purpose-built flats, the second highest proportion in England and Wales after the City of London and twice the proportion in the London region. In terms of ownership, there was a slight decrease in the number

of owner-occupiers from 24.2% in 2011 to 23.1% in 2021. This is the lowest proportion of owner-occupiers of any area in England and Wales.

8.18 Of the households in Tower Hamlets, 31.5% had one bedroom, 39.9% had two bedrooms, 20.0% had three bedrooms, and 8.6% had four or more bedrooms. Since 2011, the largest increase in households came from four or more-bedroom households (28% increase) and one-bedroom households (26% increase), with slightly smaller increases in two-bedroom households (15%) and three-bedroom households (17%).

8.19 There has been a decrease in social renting households from 39.6% in 2011 to 35.9% in 2021, with 13.9% of households (16,697) renting from the local authority. On the other hand, there has been a rise in private renting from 32.6% in 2011 to 38.2% in 2021, making Tower Hamlets the 5th highest area for households renting privately in England and Wales in 2021.

8.20 Regarding overcrowding, 15.8% of households (19,130 households) were considered overcrowded based on the measure of having too few bedrooms. This was slightly lower than in 2011 when it was 16.4%. However, Tower Hamlets still had the fourth-highest rate of any area in England and Wales after Newham, Barking & Dagenham, and Brent.

8.21 Tower Hamlets has consistently delivered more homes than any borough within London, with the period between 2012-2021 showing a total of 21,097 dwellings being delivered. However, the need and demand for new homes remains significant - as of April 2022, there were 21,840 households on the council's Common Housing Register, providing a measure of the affordable housing need within the borough.

8.22 The overall median price for a property within Tower Hamlets across all types was £525,000 in September 2022 whilst the overall median rent across all bedroom types was £1,650 a month.



Built form

8.23 Tower Hamlets is made up of 24 places, each containing unique characteristics that shape and define the borough and that have coalesced over time. Much of the borough has been developed at a modest scale with many neighbourhoods composed of streets of terraced properties dating from the 19th century. Located alongside the River Thames, the economy of much of the borough depended on this watercourse and thriving docks characterised the area until the middle of the last century. The decline of the docks has brought significant change and regeneration to the borough. The former docklands have changed from largely working environments to provide new residential neighbourhoods for the borough's growing community. Many have been developed at high densities and including clusters of tall buildings that have transformed the borough's skyline.

8.24 Tower Hamlets contains substantial areas of historic and architectural interest, including 58 conservation areas (which cover around 30% of its total area) and over 2,000 listed buildings, with great variation in character and size. Some of these buildings are landmarks of national and international importance, including the Tower of London (a UNESCO world heritage site) and Christ Church, Spitalfields. Other notable historic buildings include the medieval parish church of St Dunstan (which predates the Tower of London) and the high-tech, former Financial Times Print Works (constructed in the late 1980s). One Canada Square is a landmark skyscraper located within the Canary Wharf Estate, standing at 235m above ground level and was the tallest building in the United Kingdom when constructed in 1990 and is the current third tallest building. The building played a significant role in the shifting of London's financial centre from the traditional Square Mile to

the historic docklands, east of the City of London. One Canada Square is a symbol of modern, progressive London and forms the backdrop to the dramatic skyline of Canary Wharf, which is visible over a wide area and globally recognised as an iconic London landmark.

8.25 Large parts of the borough, predominantly towards the Isle of Dogs, Lower Lea Valley, Olympic Legacy and City Fringe areas have undergone significant change and regeneration within our inner-city communities. In recent years there has been an increase in the number of tall buildings, causing notable changes to the borough's skyline. For a number of years, Tower Hamlets has had the largest pipeline of tall buildings of any local authority area in the United Kingdom (including consented and proposed developments).

8.26 Tall building clusters have also established in neighbouring boroughs and are visible from vantage points within Tower Hamlets. These include Dalston in the London Borough of Hackney, Stratford and Canning Town in the London Borough of Newham, the Greenwich Peninsula in the Royal Borough of Greenwich, Canada Water in the London Borough of Southwark and Lewisham town centre in the London Borough of Lewisham. Further investment and growth is taking place in the Lower Lea Valley, around the Royal London Hospital and Queen Mary University and at the former London Dock in Wapping.

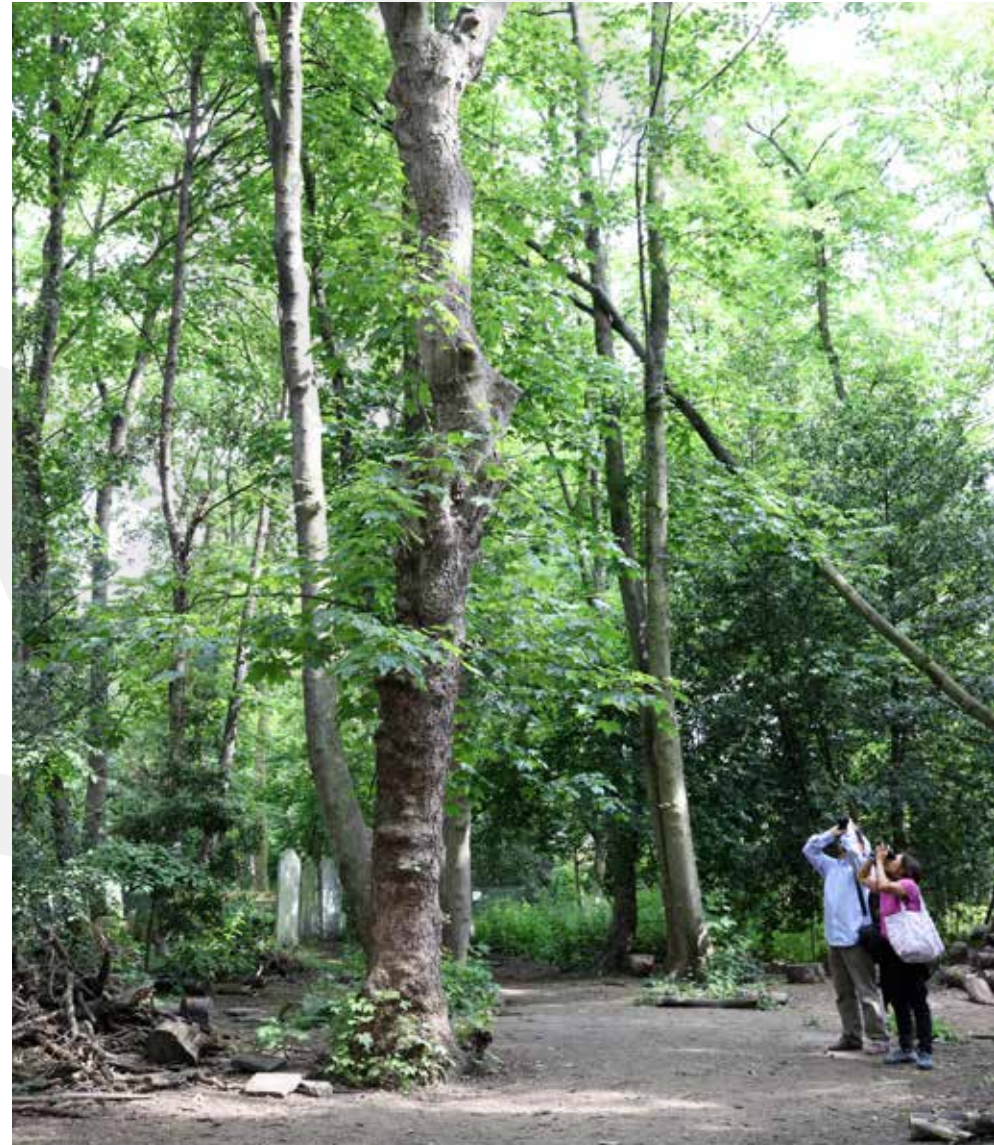


Environment and open spaces

8.27 Tower Hamlets is home to over 200 parks and open spaces, with more than 170 of these accessible to the public, covering an area of approximately 260.58 hectares. Of these spaces, 5 are Registered Historic Parks and Gardens with listed status ranging between Grade II* to Grade II, 16 are protected London Squares, and 52 are sites of historic interest. While larger urban parks, including Victoria Park, Mudchute Park, and Mile End Park, play a significant role in attracting visitors from across London, the overall provision of publicly accessible open space in the borough is lower than that of other inner London boroughs with similar characteristics and falls below national standards. Furthermore, the borough's topography and urban form make it susceptible to the effects of climate change, including flooding and the urban heat island effect.

8.28 One of Tower Hamlets' greatest natural assets is its access to the river Thames and the network of inland waterways that cut through the borough, which includes canals, reservoirs, and former working docks. The borough is also home to a rich biodiversity of rare and protected species, such as the black poplar (Britain's rarest native timber tree), the nationally scarce brown-banded carder bee, the streaked bombardier beetle (recently recorded from only four UK sites), bats, great crested newts, and the black redstart.

8.29 In March 2019, Tower Hamlets Council committed to becoming a net zero carbon council by 2025 and a net zero carbon borough by 2045 or sooner, as part of its efforts to play a role in addressing the climate emergency and moving towards a cleaner and greener future.



Business and the economy

8.30 Tower Hamlets has a vibrant economy which has played a significant role in supporting the vitality of the borough and its people, as well as making a healthy contribution to the overall economic growth of Greater London and the wider national economy.

8.31 Tower Hamlets' vibrant local economy can be attributed to the strong and unique presence of our markets which are mostly situated in our thriving local town centres. The local economy is also made up by many local retail businesses and micro and local independent businesses. This provides a unique character to the borough, creating a strong sense of community and diversity.

8.32 Tower Hamlets is also home to London's second financial district at Canary Wharf, which plays host to several major businesses, including financial services companies, law firms, and multinational corporations. It has also become a hub for the emerging tech industry and life sciences, with several technology and biotech start-ups choosing to set up base in the area.

8.33 The borough's creative industries, particularly in film, television, and music production, continue to thrive, with Tower Hamlets providing an ideal location for studios and production companies. Additionally, the area is home to a range of universities, colleges, and schools, making it a popular destination for students.

8.34 Tower Hamlets' close network of commercial areas, excellent transport links, and location on the edge of the City make it a popular choice for businesses and individuals to locate in the borough as well as have access to the wider London market if needed.



Employment

8.35 There were an estimated 323,000 jobs in Tower Hamlets in 2021, a number which is expected to increase to 439,000 by 2026. Average weekly earnings in Tower Hamlets are significantly higher than the London and UK averages, with the average full-time worker in the borough earning £797.30/week in 2020. Despite this strong economic growth, there is no correlation between the economic growth of the borough and better living standards for some people. A significant portion of residents are living next to a thriving economy unable to reap its benefits. Fewer than 15% of jobs in the borough are taken by borough residents, and Tower Hamlets has the highest worklessness rate in London and 14% of residents have no qualifications - twice the London average. Persistent inequality requires further intervention in order for residents to access the benefits from the economic development. The skills of many residents are ill suited to the new jobs that are being created.

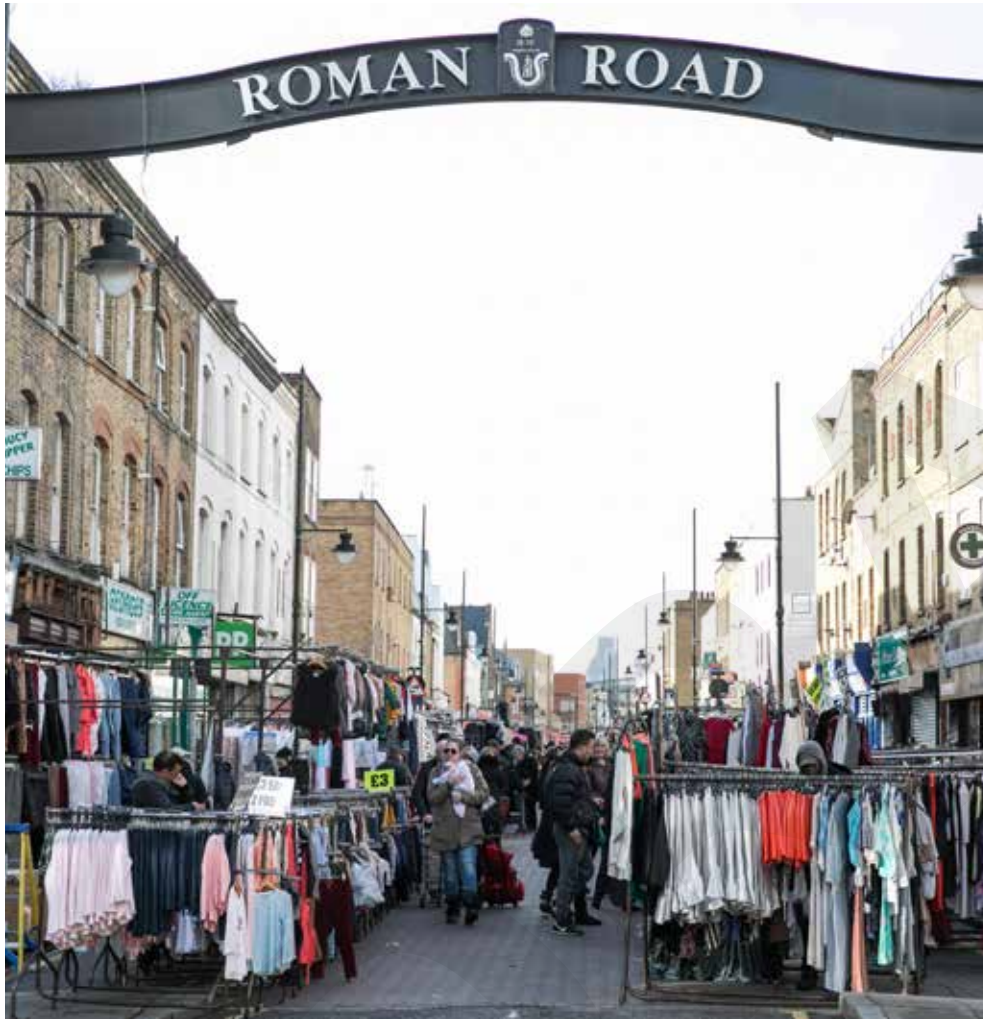
8.36 While the economic profile of Tower Hamlets is dominated by some of the world's largest financial and professional service organisations with 40% of all jobs within Tower Hamlets within this industry (Financial and Professional Services), primarily influenced by Canary Wharf and the City Fringe - the borough has a wide range of local businesses including small family companies, creatives, start-ups, light manufacturers, and small-to-medium sized enterprises (SMEs). The vast majority of businesses based in Tower Hamlets are small businesses with 98% of enterprises employing fewer than 50 people and nine in ten are 'micro' businesses which employ fewer than 10 people. 7% of enterprises are sole traders. Only 0.5% of the borough's enterprises employ 250 employees or more.

8.37 Emerging creative, digital, and ICT hubs can be found in areas such as Bethnal Green, Brick Lane, Cambridge Heath, and Whitechapel. The northern and eastern parts of the borough are more industrial in nature, with recent growth in the creative sectors in places like Bow and Fish Island.

8.38 Tower Hamlets has bucked the trend seen across England, with the 2021 census showing an increase in overall employment for people aged 16 years and over (excluding full-time students). The percentage of employed individuals in the borough rose from 55.7% in 2011 to 58.7% in 2021, while across England it decreased from 56.5% to 55.7%. Meanwhile, the percentage of people aged 16 years and over who were unemployed (excluding full-time students) in Tower Hamlets fell from 6.5% to 4.7%, with the percentage of economically inactive individuals aged 16 years and over who were retired decreasing from 7.6% to 5.8%.

8.39 Over the period 2023-2038, Tower Hamlets is expected to see demand for an additional 283,000sqm of office floorspace and 77,000 sqm of industrial floorspace.

8.40 It is important to note that the Census 2021 data was collected during the COVID-19 pandemic, a time of rapid and unprecedented change. The national lockdown, associated guidance and furlough measures may have had an impact on the labour market and our ability to measure it.



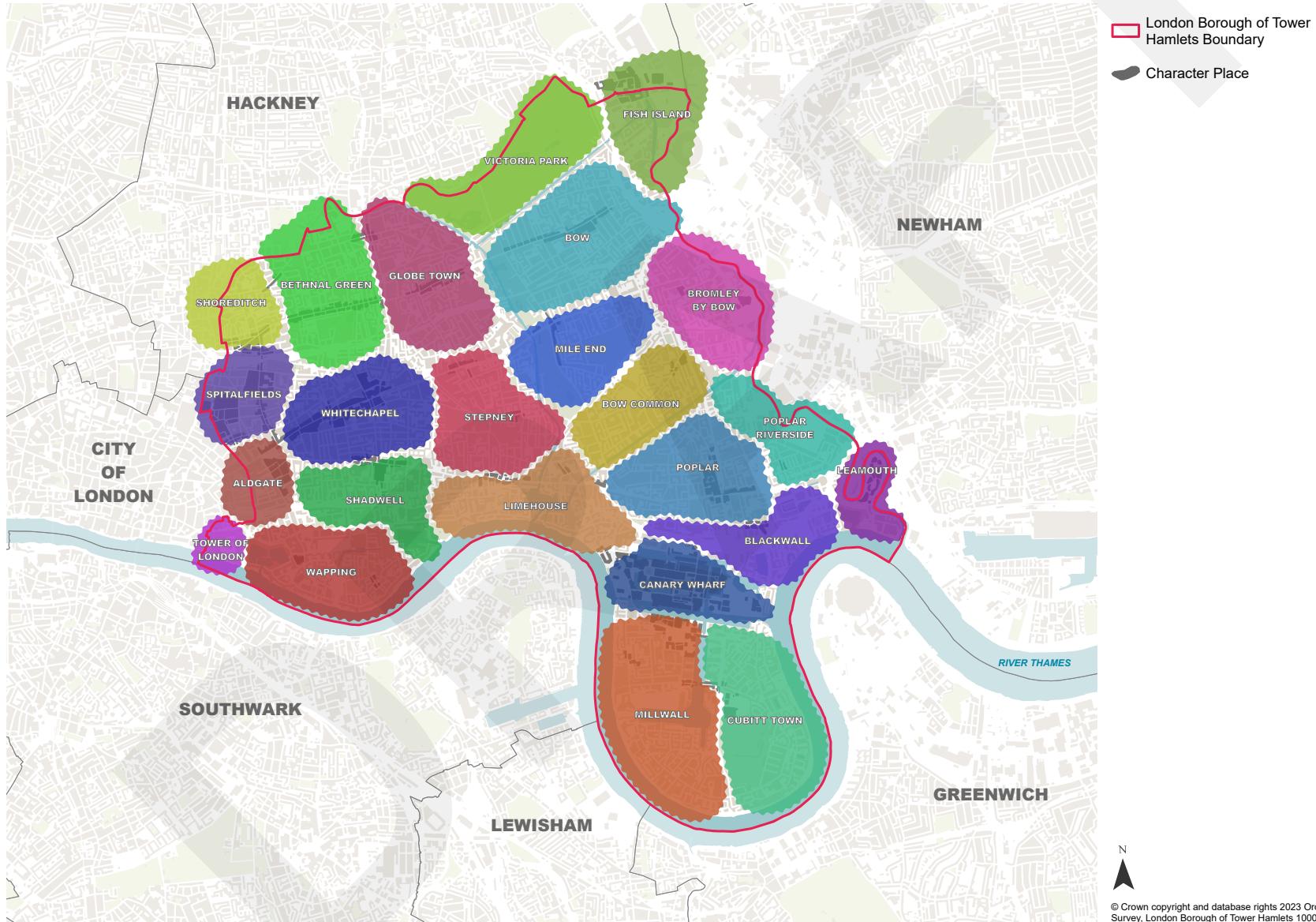
Town centres

8.41 Tower Hamlets is a diverse borough that contains a variety of town centres, each contributing to the vitality and vibrancy of the area. The borough contains parts of the London Plan's Central Activities Zone (CAZ), as well as one metropolitan centre in Canary Wharf, eight district centres, three specialist centres, three CAZ centres, 16 neighbourhood centres, and 14 neighbourhood parades.

8.42 The town centres serve a vital function in the wider community, with each offering a diverse and varied selection of amenities. The bustling markets in Whitechapel, Crisp Street, Roman Road, Columbia Road, and Petticoat Lane provide a unique shopping experience. Meanwhile, Spitalfields, Redchurch Street, Brick Lane, Canary Wharf, Hackney Wick, Whitechapel, Cambridge Heath, Columbia Road, and Bethnal Green offer a thriving night-time economy. Canary Wharf is home to a range of retail, leisure, and community offers, and the borough also has a growing arts and cultural scene, which includes galleries, museums, cinemas, theatres, studios, and drinking establishments.

8.43 These town centres play an important role in the wider strategic function of London and contribute significantly to the area's international appeal. In addition, the borough's community facilities, including libraries, leisure centres, community hubs, idea stores, places of worship, and the new Town Hall in Whitechapel, are highly valued by Tower Hamlets residents.

Figure 5: 24 Character places





Vision and objectives



**Empowering the next generation:
building a brighter future for Tower
Hamlets, together.**

9. Our vision for Tower Hamlets

9.1 Our vision for Tower Hamlets is to build a brighter future, to empower the next generation, and to promote a multicultural and diverse community that thrives within mixed, cohesive, and inclusive neighbourhoods. The council will prioritise inclusivity for people of all ethnicities, faiths, genders and sexual orientation, walks of life, designing our places to ensure that people are put first within the highest quality environments that meet the needs and ambitions of all our communities.

9.2 The council will strive to address overcrowding in the borough and meet the range of housing needs of our communities by delivering a significant amount of high-quality new homes. The issues caused by overcrowding including poorer health and educational outcomes, increased impacts on mental health and greater incidences of depression and anxiety will be mitigated with the focus on an increased capacity for housing. We will consider a mix of housing products, types, tenures, layout, and size to best match the borough's population, with a focus on affordable and social housing, particularly family homes that can meet the needs of our overcrowded residents. We will seek to focus on the delivery of affordable and social housing through a 50% overall target and a 40% on-site development requirement to tackle the overcrowding and housing crisis. The borough's Tall Building Zones (TBZ) will be expanded to optimise housing capacity and provide an uplift in affordable housing. Tower Hamlets will work towards a clean and green future where carbon emissions and overall energy usage are reduced. We will prioritise the reuse and adaptation of buildings and where not feasible, the recycling of building materials. We will support walking and cycling links alongside the use of, and improvements to,

the public transport network. The transport needs of all residents will be considered as part of future development opportunities, particularly where this supports mobility needs or for the purposes of employment. The borough's network of green and blue spaces, including Victoria Park, Mile End Park, Mudchute Park, the Thames, River Lea, Dock Basins, and canals, will provide opportunities for leisure, relaxation, and entertainment with a variety of uses encouraged to support health and well-being while still ensuring their enjoyment and function as open spaces is retained.

9.3 The borough, having regained the planning powers for parts of Bromley-by-Bow, Fish Island, and Hackney Wick from the LLDC, will continue to integrate and grow the distinctive opportunities these areas offer.

9.4 The borough's small businesses, start-ups, and markets including Whitechapel Market, Petticoat Lane Market, Bethnal Green Markets, Roman Road Market, Columbia Road Market, Watney Market, Crisp Street Market, Brick Lane Market, and other local traders will be prioritised and at the heart of decision-making. The key employment areas of Canary Wharf, Whitechapel, and the City Fringe will continue to evolve into dynamic centres of innovation and global hubs for the financial, technology, professional, life-sciences, biotech, and digital sectors. The continued benefits of the Elizabeth line arrival will further unlock the unique opportunities available within the borough. A community wealth building approach will be adopted, alongside the provision of genuinely affordable workspace will be prioritised for local small businesses, local start-ups, makers, the creative industries, and emerging and thriving small and medium-sized enterprises.



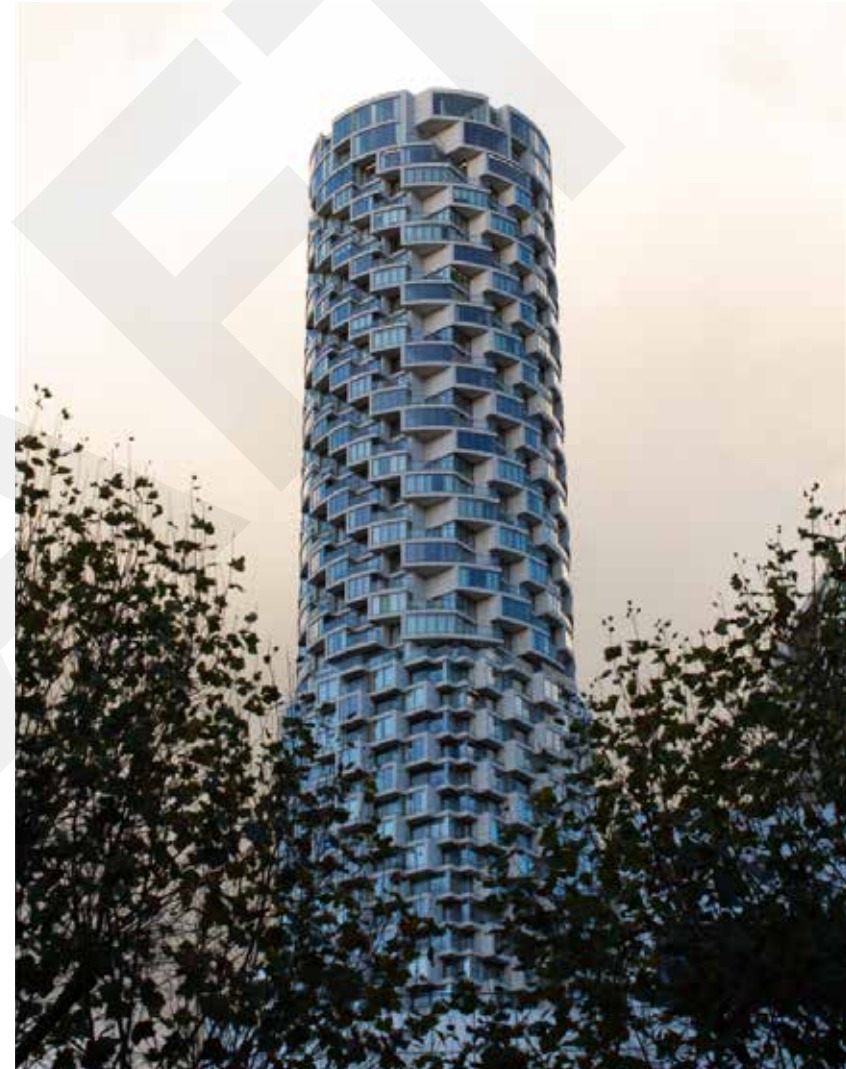
9.5 We will identify and coordinate the provision of infrastructure necessary to support our growing population, including promoting the delivery of new parks, public transport improvements, educational, health, community, cultural, and recreational facilities across the borough.

9.6 Our unique town centres, markets, historical, and cultural attractions will be revitalised to support local communities and become some of London's top attractions. With the borough's growing

population, young people will be at the forefront of anticipated regeneration with jobs, homes, spaces, and environments geared towards their success.

9.7 Exceptional design and architectural innovation will be ensured across the borough to ensure our distinct buildings, skylines, and streetscapes provide a high-quality environment for our residents and remain a recognisable feature of London. We will celebrate the vibrant history and urban landscape of Tower Hamlets through thoughtful design and placemaking, highlighting our rich, historic, and significant character areas. Tower Hamlets will emerge from the economic impacts of the COVID-19 pandemic and Brexit to maintain its status as an international hub for business, culture, and tourism. Our unique location, with strong links to the City of London, Stratford, London City Airport, and beyond, will allow for a rich mix of strategic functions that benefit the community.

9.8 By 2038, Tower Hamlets will have made significant strides in addressing overcrowding, delivered thousands of new homes to support the community, provided opportunity for markets and small local businesses to thrive, and improved the overall health and safety of residents. The borough will have continued to play a role in supporting London's growth and economy through sustainable development. The borough's strong and inclusive communities will be thriving within healthy environments, ensuring a brighter future for all.



10. Key objectives and principles

The Local Plan's strategic objectives provide a link to the delivery of the vision for Tower Hamlets. These objectives address the key challenges of the borough over the 15-year plan period.

The objectives have been informed by and reflect many of the key documents prepared by the council, including the Strategic Plan (2022-2026).

10.1 Empowering our communities culturally, economically, and politically:

- a. Growth will be delivered through high-quality, best practice design outcomes that optimise land and the opportunity made available by the borough's unique assets. Such growth will be delivered to retain, reinforce, and protect the historic character of Tower Hamlets to ensure the identity of our neighbourhoods, communities, and townscapes remain special and distinctive.
- b. Important views and landmarks across the borough that make architectural, cultural, or aesthetic contributions will be protected and where possible enhanced.
- c. Arts and cultural event spaces and businesses will be encouraged to flourish and supported to thrive as part of the distinct identity of communities.
- d. Communities will be empowered to be involved within the planning system at the earliest opportunity; through consultation, making the process more transparent and accessible, and providing support for the process of neighbourhood planning.



10.2 Tackling overcrowding and housing in our borough:

- a. Tower Hamlets will respond to the growth of the borough through positively managing the delivery of new homes to meet the diverse needs of the wider population.
- b. Tackling overcrowding across the borough will be prioritised to combat levels of increased poverty, physical and mental illness, and poor living standards through increasing overall housing supply, setting a target of 50% genuinely affordable homes across the borough and ensuring the delivery of larger sized homes within affordable and social rented units.

- c. The delivery of genuinely affordable, family-sized, low-cost social rent homes will be prioritised in lieu of intermediate products to respond to the borough's most critical need.
- d. High-quality housing stock will be delivered along with the provision of a range of housing products that cater to specific needs, including for older people.
- e. The borough's emphasis on mixed and inclusive communities will be reinforced to encourage community cohesion that both enables communities to welcome new residents and ensure existing residents remain rooted within their local neighbourhood.
- f. New homes will be located and designed to ensure equitable access to high-quality local services, amenities and public spaces.
- g. The capacity of development sites across the borough will be optimised, making efficient use of land, ensuring appropriate densities and exploring the potential for tall buildings. h. The use of innovative building types and technologies will be encouraged in suitable locations to provide sustainable high-quality internal and external living environments.
- h. The provision and enhancement of infrastructure including community and youth services will be identified and coordinated.

10.3 **Supporting young people and accelerating education:**

- a. Tower Hamlets will continue to support the development of skills, training, and career opportunities for young people, ensuring long term prospects within the borough's key industries and sectors.
- b. Public space, play areas, and community infrastructure will be of high quality, and be safe, fun, and welcoming for all young people to support recreational use, active and healthy lifestyles.
- c. Access to education, learning interventions, opportunities for financial support, and childcare provision will be prioritised to support young people and the community.
- d. Community functions across the borough will be supported, including an investment in youth services to support young people with study spaces, career advice, the development of life skills, and leisure activities.
- e. Investment in young people across the borough and effective support for educational aspirations will be secured to ensure increased opportunities at the country's top universities. Initiatives including the council's priority to deliver an Institute of Academic Excellence will be supported.



10.4 A thriving local and global economy that boosts jobs, skills, businesses and tackles inequalities:

- a. Local traders, entrepreneurs, start-ups, and small local businesses will be supported and provided with opportunity to thrive. Access to genuinely affordable workspace options will be delivered across the borough.
- b. The borough's markets including Whitechapel Market, Petticoat Lane Market, Bethnal Green Markets, Roman Road Market, Columbia Road Market, Watney Market, Chrisp Street Market, and Brick Lane Market will be strongly supported and invested in with their maintenance, promotion, and general upkeep at the heart of decision-making.
- c. Local businesses will take advantage of the borough's proximity to world-class visitor attractions (including the Tower of London world heritage site, the Tower Bridge, and Brick Lane), encouraging visitors to explore more of the borough.
- d. The current skills gap and inequalities amongst the working population will be closed, through improving access to education, training, careers, social mobility, and increasing the mix of employment sectors.
- e. Local job opportunities, education, and skills opportunities (including apprenticeships, internships, work placements, and graduate placements) will be prioritised through development schemes, with a particular emphasis on promoting inclusion to support under-represented groups (e.g., SEND residents, women, and BAME residents).

- f. The borough's role as a key location for employment opportunities will continue to flourish, optimising the economic benefits of Canary Wharf, Whitechapel, the City Fringe, and growing business and economic hubs across Tower Hamlets.
- g. The benefits of the new Elizabeth line, including the stations at Whitechapel and Canary Wharf, and other transport schemes will act as a further catalyst for investment and economic growth in the borough.

10.5 **Securing infrastructure delivery to protect and strengthen public services:**

- a. Tower Hamlets will meet the duties to deliver essential physical, digital, community, and green infrastructure, linked to effective infrastructure planning and delivery including through the securing of obligations through Section 106 Agreements.
- b. The timely provision of sufficient infrastructure, optimised capacity and densities to meet current and future needs will be secured, taking account of the cumulative impact of future development, especially in deficient areas.
- c. Additional transport investment (including improvements to bus, rail, and river services, new river crossing opportunities, and pedestrian and cycle connections) will be championed to support growth.
- d. Improvements in services, programmes, and facilities that support adults social care, children's services, children with SEND, and children in trouble with the law will be promoted across development opportunities.

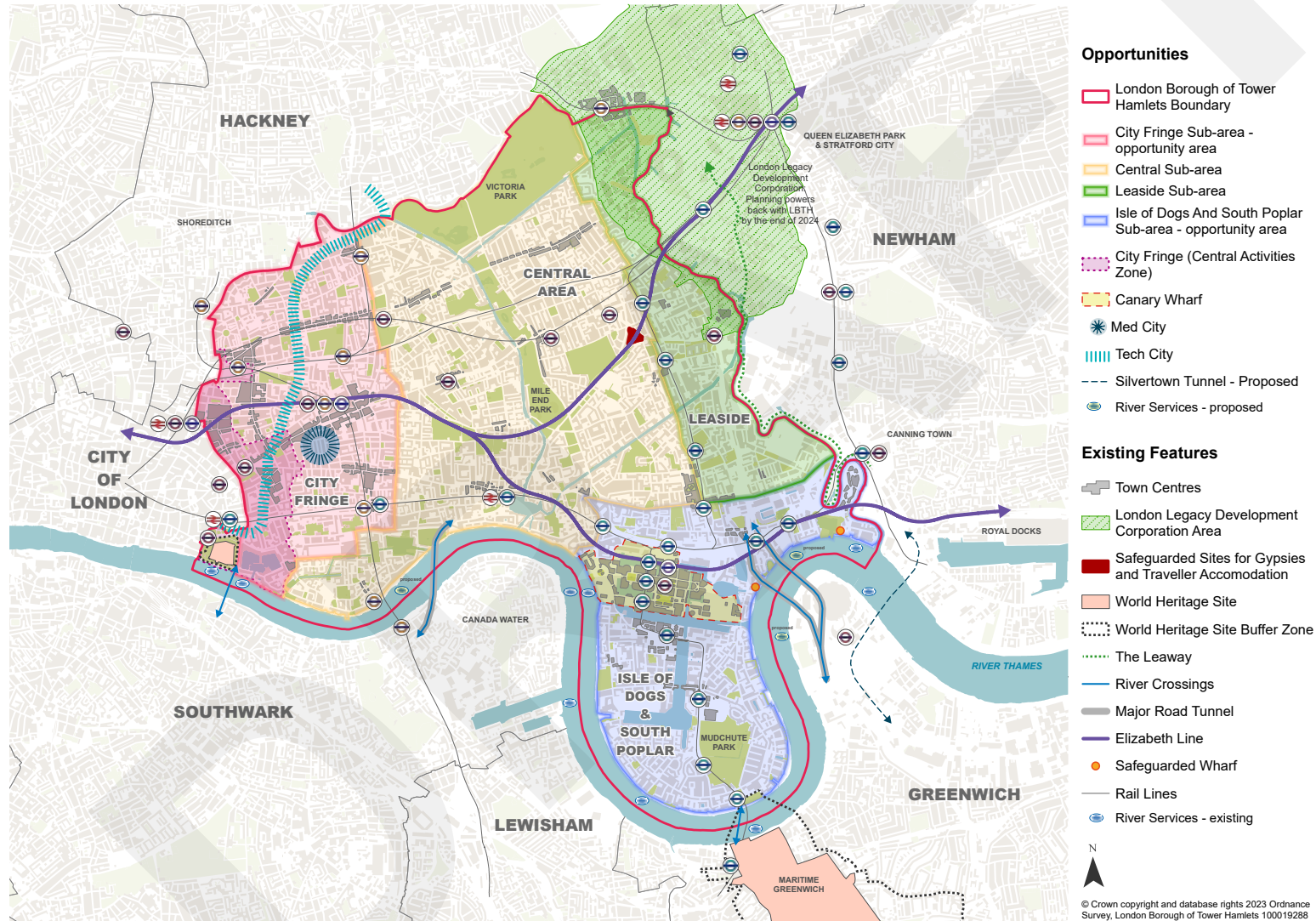
- e. The borough's network of libraries and idea stores will be supported and invested in with their contributions to the borough's residents invaluable.
- f. Partnerships and collaborations across the borough will be promoted including opportunities for integrated health and care services to meet residents' needs.

10.6 **A clean and green future:**

- a. Tower Hamlets will become a net zero carbon borough by 2045 or sooner.
- b. Tower Hamlets will play its part in tackling the climate emergency through ensuring zero carbon developments are delivered across the borough alongside the exploitation of low carbon energy sources and through the support of retrofit opportunities on existing buildings to be climate resilient.
- c. The use of sustainable transport modes including walking, cycling and electric vehicles will be promoted to realise long-term energy use reductions and carbon emissions. Energy efficiency and other green measures will be maximised through development.
- d. The number of electric vehicle charging points in the borough will be increased and support provided to those in the community who depend on their car for work or mobility in accordance with the Mayor's commitments outlined in the 'Cleaner and greener future for Tower Hamlets' document (2023).

- e. The ecological, biodiversity, and recreational value of the borough's natural assets will be protected and promoted to take advantage of our green spaces and waterways. An overall net gain in biodiversity will be delivered across the borough to increase the resilience and significance of our ecosystem.
 - f. The borough's poor air quality will be addressed to provide a safer living environment, through a range of innovative methods and solutions with strict requirements on developments to be applied.
 - g. Leisure, retail, jobs, services, and associated necessary infrastructure will be located to best support local neighbourhoods and to reduce the need for long-distance travel. This will assist local residents in supporting physical activity, active travel, greener streets, and public spaces.
 - h. Flood risk will be mitigated through the use of multi-functional green spaces including sustainable drainage systems, improved flood defences, and innovative water management methods.
- 10.7 **Healthy, safe and inclusive neighbourhoods:**
- a. People of all ages, background, and abilities will be provided with an environment that encourages and enables active and healthy lifestyles. Social interaction and accessibility will be promoted in buildings, streets, and spaces to create high-quality places that are valued, enjoyed, and feel safe for all.
 - b. The borough's neighbourhoods will become safer and perceptions of safety will improve by delivering high-quality, legible, visible, and permeable spaces that are inclusive and accessible to everyone. The built environment will comprise welcoming spaces that design out crime and improve resilience to emergencies.
 - c. Socially cohesive, mixed, balanced, and healthy communities will be promoted together with walkable neighbourhoods to enhance the population's wider health and well-being and to address the wider determinants of mental health and deprivation. The effects from the high level of growth and construction will be managed to ensure minimised impacts to local communities.
 - d. Initiatives to develop programmes and spaces for women from ethnic minority backgrounds and faith communities will be supported to empower women and to ensure an inclusive and cohesive community.
 - e. Opportunities to deliver health facilities will be promoted across the borough with an investment in drug treatment, rehabilitation, and recovery programmes, including culturally sensitive projects targeting those under-represented in drug and treatment services.

Figure 6: The key diagram



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11. Delivering the Local Plan



DV1 – Areas of growth and opportunity within Tower Hamlets

DV2 – Delivering sustainable growth in Tower Hamlets

DV3 – Healthy communities

DV4 – Planning and construction of new development

DV5 – Developer contributions

DV6 – Social value

DV7 – Utilities and digital connectivity

DV8 – Site allocations

Introduction

11.1 The following policies set out a holistic approach to helping realise and implement the vision of the Local Plan and how sustainable development and growth will be delivered in Tower Hamlets. Together, they support our aspiration to build a brighter future, tackle overcrowding and the housing crisis, create a clean and green borough, empower the next generation, and to ensure a multicultural and diverse community that thrives within mixed, cohesive, and inclusive neighbourhoods. This is about shaping the future of life in Tower Hamlets.

11.2 This section contains the following policies:

- Policy DV1: Areas of growth and opportunity within Tower Hamlets
- Policy DV2: Delivering sustainable growth in Tower Hamlets
- Policy DV3: Healthy environments
- Policy DV4: Planning and construction of new development
- Policy DV5: Developer contributions
- Policy DV6: Social value
- Policy DV7: Utilities and digital connectivity
- Policy DV8: Site allocations

Policy DV1 Areas of growth and opportunity within Tower Hamlets

1. To meet the borough's pressing needs the council will promote development proposals in locations across the borough, particularly where they support housing delivery, and work with the community and stakeholders to support the principles of sustainable development and good growth. This will be achieved through:

- a. promoting the majority of the borough's growth towards:
 - i. the borough's site allocations where significant development opportunities are identified;
 - ii. highly accessible locations which have good links to public transport, walking and cycling networks, and local services;
 - iii. the opportunity areas, as illustrated in figure 6, of the City Fringe, Poplar Riverside, and the Isle of Dogs and South Poplar; and
 - iv. the Central sub-area of the borough, through gradual intensification and optimised site capacity while respecting and enhancing the area's well-established character.
- b. promoting comprehensive design and development to ensure co-designed site masterplanning.

2. The council will require development proposals that are within or part of a site allocation to deliver design-led site optimisation that accords and is compatible with the identified land uses, infrastructure requirements and site allocation specific design and delivery principles.

3. The council will prioritise development proposals for residential use which comply with the affordable housing policies of the Local Plan.

4. The council will promote, protect, and support the 'everyday economy,' that creates new jobs, businesses, services, and local employment opportunities for residents across the borough. This will be achieved through:

- a. promoting affordable workspace opportunities to support local businesses, start-ups, entrepreneurs, and small-to-medium sized enterprises (SMEs);
- b. protecting and enhancing the borough's Preferred Office Locations (POL), Central Activities Zone (CAZ) and Canary Wharf Fringe for commercial and employment-led development, strategic CAZ functions or other uses considered appropriate in accordance with the role and function of their designation;
- c. protecting and supporting intensified industrial development within the borough's Strategic Industrial Locations (SIL) and Local Industrial Locations (LIL);
- d. supporting a mix of employment accommodation types for secondary, local or specialist need within the borough's Local Mixed-use Employment Locations (LMEL), and
- e. promoting the protection and retention of railway arch space for a wide range of industrial uses and community spaces across the borough.

5. The council will promote the borough's town centres, including high streets and street markets, and ensure these continue to be the focus

of shopping, leisure, cultural, and community activities, and will include a broad range of uses that are accessible to a significant number of people via foot, cycle, or public transport.

6. Where appropriate the council will require developments to deliver significant new infrastructure to support growth within the four sub-areas, including:

- a. improvements to the transport network and wider strategic and local connections;
- b. green grid projects;
- c. community infrastructure;
- d. outdoor sports pitches, new parks, and public open spaces; and
- e. the delivery and coordination of essential new and upgraded utilities and services across the borough.

7. The council will support opportunities to maximise the delivery of social value to positively contribute to additional social, economic, environmental, and community benefits, including economic well-being, social inclusion, equal opportunity, and community cohesion.

Supporting text

11.3 This policy recognises that the whole borough has a role to play in addressing development needs, while seeking to ensure new development is in keeping with the principle of good growth and can deliver sustainable communities. Part 1 of this policy sets out the broad locations and opportunity areas within the borough where growth (primarily housing delivery) and investment will be targeted over the lifetime of the plan. The growth will also be complemented by development on small sites. Significant housing delivery is needed across the borough help alleviate overcrowding and to ensure genuinely affordable housing is provided to those most in need.

11.4 Part 1(a)(i) looks to direct the majority of the borough's growth towards the borough's site allocations. These are sites that have been identified across a range of locations within each of the sub-areas to address the housing and employment needs of the borough as well as facilitate the delivery of key supporting infrastructure, such as publicly accessible open space, schools, and other social infrastructure. These sites are shown on the Policies Map. Further information on the detailed site-specific requirements that will inform the design, scale, and layout of new development within these allocations is set out in Section 4.

11.5 Part 1(a)(ii) aims to direct growth to highly accessible locations with good links to existing or commitment to the delivery of public transport, cycling and walking networks, and town centres in line with policies TC1 and MC1.

11.6 Part 1(a)(iii) seeks to direct growth towards the three opportunity areas (City Fringe, Poplar Riverside, and Isle of Dogs and South Poplar) which have been identified in the borough by The London Plan (GLA, 2021) and have significant potential to accommodate new development and support urban renewal given their capacity for growth and existing

and planned infrastructure. These areas are shown on the key diagram (see Figure 6).

11.7 Part 1(b) expects all development proposals to demonstrate comprehensive design and development. Piecemeal delivery on sites will be resisted. Piecemeal delivery is where individual developments on shared sites or adjacent sites are delivered in different ways and at different times without coordination between the developments, leading to a poor quality of placemaking and lack of vision for the wider area. Instead, development proposals on shared sites or on sites in proximity to other development sites must demonstrate co-designed site masterplanning has taken place which realises the site vision and design principles, creating high-quality places and neighbourhoods, and ensuring that the timing of delivery is supported by the necessary infrastructure.

11.8 Part 2 aims to ensure that development proposals within or part of the borough's site allocations realise the site vision and design principles, and ensure the timing of delivery is supported by the identified infrastructure requirements. This can be achieved through design-led site optimisation which seeks to ensure that development makes the best use of land through the consideration of design options, determining the most appropriate density and form of development for the site's context, capacity for growth and connections to jobs, services, infrastructure, and amenities.

11.9 Part 3 of the policy highlights the council's prioritisation of affordable housing delivery in the borough and the need for development to comply with the affordable housing policies of the Local Plan to alleviate the large-scale levels of overcrowding and lack of affordable housing in the borough.



11.10 Part 4 of the policy seeks to ensure new development promotes, protects, and supports the "everyday economy" which focuses on jobs, opportunities, and the experiences of local people and residents across the borough.

11.11 Part 4(a) looks to promote the provision of affordable workspace across the borough to support the "everyday economy," particularly local businesses, start-ups, entrepreneurs, and SMEs.

11.12 Part 4(b) seeks to protect and enhance employment-led development, or other strategic CAZ functions and appropriate uses, in the following strategic locations: the Preferred Office Locations

(POL); CAZ and Canary Wharf Fringe (as identified on Figure 16). In particular to support Tech City - a strategically important business cluster within the heart of the City Fringe sub-area, centred on digital and creative companies, particularly around Shoreditch, Spitalfields, and Whitechapel, and a new state-of-the-art life science research hub around the existing Queen Mary University campus and Royal London Hospital site in Whitechapel alongside residential and commercial uses.

11.13 Part 4 (c) seeks to protect the borough's Strategic and Local Industrial Locals. Given the borough's limited area and increasing demand for industrial land it is necessary to protect such locations to ensure there is land to meet such employment and business needs.

11.14 Part 4(d) and (e) support the need for mixed and innovative uses in employment areas and also maximising opportunities in railway arch spaces.

11.15 Part 5 emphasises that the council will promote the borough's town centres as the economic, transport, social and civic hearts of our communities, offering the greatest accessibility to jobs, services, shops and public transport. They have faced great challenges as a result of global circumstances over the past few years, most notably the COVID-19 pandemic and its follow-on consequences. In order to stimulate recovery and to nurture vibrancy back into our town centres, high streets, and street markets, there is a need to diversify and increase accessibility to attract more people and businesses throughout the day and evening as well as meet changing customer demands. The network and hierarchy of centres is set out in policy TC1, with each centre performing a different but complementary role.

11.16

11.17 Part 6 outlines the requirements on developments to deliver new infrastructure and utilities to meet the demand from significant levels of development in the borough and the resulting population growth across the Local Plan sub-areas of City Fringe, Isle of Dogs, Central Area and Lower Leaside. A range of facilities, services, and infrastructure will need to be delivered. This includes:

- a. improvements to the transport network and wider strategic and local connections;
- b. green grid projects (including East India Dock, the Lea River Park and Whitechapel Green Spine);
- c. community infrastructure, such as schools, youth clubs, early education and childcare facilities, purpose built special educational needs schools/teaching units, new parks, open space, health centres, sports centres and leisure facilities;
- d. outdoor sports pitches, new parks and public open spaces; and
- e. coordinating the delivery of essential new and upgraded utilities and services infrastructure across the borough to ensure utilities networks and connections can serve new developments, supporting the creation of new neighbourhoods and enhancing facilities on sites of intensification.

11.18 As well as requirements for additional infrastructure, much of the borough's existing infrastructure is at or close to full capacity and in many cases requires investment. Developers are therefore expected to contribute towards meeting the additional infrastructure needs arising from new development. Further details (including the mechanisms through which developers will be expected to contribute towards

infrastructure provision) are outlined in Policy DV5, Section 4 (relating to site allocations) and Section 5 (relating to the monitoring and delivery framework).

11.19 As well as requirements for additional infrastructure, much of the borough's existing infrastructure is at or close to full capacity and in many cases requires investment. Developers are therefore expected to contribute towards meeting the additional infrastructure needs arising from new development. Further details (including the mechanisms through which developers will be expected to contribute towards infrastructure provision) are outlined in Policy DV5, Section 4 (relating to site allocations) and Section 5 (relating to the monitoring and delivery framework).

11.20 Part 7 sets out that Social value refers to a broader concept of value beyond just monetary contribution. It focuses on people and contribution to the community, assessing the positive value created for the local economy, improvements in social well-being, and enhancements to protect the local environment. There is a precedent for considering social value as a key factor in procuring contracts after the passing of the Public Services (Social Value) Act 2012. When applied to development, social value looks at the wider social contribution a development creates for society across its whole lifecycle, from how it is constructed to how it is managed, considering its direct and indirect impacts. This is in-line with Part 2 of the NPPF 'Achieving Sustainable Development', which outlines the three objectives of the planning system: to promote economic well-being, improve social progress, and protect and enhance our natural and built environment.

11.21 This policy will be implemented through a number of mechanisms such as supplementary planning guidance, masterplans, and opportunity area frameworks, which provide more detailed guidance to coordinate and manage development alongside the London Plan.

London Plan policies:

- H2 Small sites
- GG1 Building strong and inclusive communities
- SD1 Opportunity Areas
- SD4 The Central Activities Zone (CAZ)
- SD5 Offices, other strategic functions and residential development in the CAZ
- SD8 Town centre network

Local Plan policies:

- All policies

Evidence base:

- The London Plan, 2021
- City Fringe Opportunity Area Planning Framework, 2015
- Isle of Dogs and South Poplar Opportunity Area Planning Framework, 2019
- South Poplar Masterplan SPD, 2021
- Central Area Good Growth SPD, 2021
- Queen Mary University London SPD, 2021
- Tower Hamlets Conservation Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan

Policy DV2 Delivering sustainable growth in Tower Hamlets

1. The council will support development proposals that contribute towards delivering the Local Plan vision and objectives where they:
 - a. ensure a design-led approach is taken to development, which requires:
 - i. high-quality design and delivery;
 - ii. optimising capacity, the efficient use of land, ensuring appropriate density, and exploring the potential for tall buildings;
 - iii. the promotion and enhancement of the historic environment, character, and setting of the area; and
 - iv. the protection of the natural environment, transport capacity, and infrastructure.
 - b. contribute towards an inclusive, cohesive, and mixed environment that is designed and useable for all. This will be achieved through:
 - i. creating healthy, equitable environments by encouraging physical activity, promoting good mental and physical well-being, and reducing environmental factors which can contribute to poor health, including overcrowding, poor air quality, and mitigation against damp and mould;
 - ii. creating mixed and inclusive communities;
 - iii. understanding the local population and their needs, and conducting appropriate community engagement to achieve this;

- iv. delivering tenure-blind developments;
 - v. increasing opportunities for social interaction;
 - vi. providing local training, employment, and enterprise opportunities in the construction and end use of a development;
 - vii. supporting the use of local goods and services as part of developments;
 - viii. providing local careers, social mobility and tackling poverty; and
 - ix. delivering social infrastructure, transport infrastructure, and public realm improvements which are inclusive and accessible to all.
 - c. contribute towards a clean and green future that ensures:
 - i. zero carbon developments, sustainable design, construction, and operation, and prioritise the whole lifecycle of buildings;
 - ii. the use of circular economy principles and prioritisation of the reuse and recycling of buildings and materials;
 - iii. low carbon energy and heat production;
 - iv. ambitious mode share targets for sustainable travel, and promoting sustainable freight;
 - v. mitigated impacts of poor air quality; and
 - vi. mitigated flood and drought risk.

Supporting text

11.22 This policy seeks to deliver sustainable development and growth in Tower Hamlets, addressing the specific environmental, social, and economic challenges facing the borough. It seeks to ensure each individual development positively contributes to implementing and delivering the vision and objectives of the plan.

11.23 For the purposes of part 1(a) of this policy, we will consider the application and design in its entirety including its relationship to its surroundings. Impacts will be considered unacceptable when they do not meet the standards and requirements provided in the policies in the plan or where they result in negative impacts that cannot be adequately mitigated. Development proposals will also be expected to conform with guidance from the council on securing design quality.

11.24 Part 1(b) requires the design of the built environment and the provision of accessible services to directly contribute to reducing inequalities (including health and wealth inequalities) and promoting community cohesion through mixed and inclusive communities. This policy addresses these objectives and helps to empower our communities and deliver healthier, more inclusive, safer, and cleaner spaces throughout the borough. Planning has a particular role to play in ensuring the built environment is accessible to all and benefits the local community. In order to demonstrate compliance, developments will be expected to provide details within the planning application statement identifying how they have met the principles outlined above. Development proposals should consider these principles from the outset and are encouraged to engage with the council through pre-applications where appropriate to ensure they are meaningfully met.

11.25 Part 1(c) seeks to address the need to achieve a clean and green future for the borough, a key priority in the council's Strategic Plan (2022-

2026), reflecting the significant need to reduce carbon emissions to tackle climate change and meet the goal of becoming a carbon neutral borough by 2045, as well as addressing the pressing need to improve cleanliness and air quality so that residents, workers, and visitors can enjoy a healthier and cleaner borough. Improvements in the standard of development through zero carbon development, sustainable operation and circular economy principles will reduce carbon emissions and help the borough achieve this goal. Mode share targets should seek to meet those set out in the Mayor's Transport Strategy.

London Plan policies:

- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG6 Increasing efficiency and resilience
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D9 Tall buildings

Local Plan policies:

- All policies

Evidence base:

- Tower Hamlets Council Strategic Plan, 2022
- Tower Hamlets Health and Well-being Strategy, 2021
- Tower Hamlets Joint Strategic Needs Assessment, 2017
- Healthy Streets for London, 2017
- Mayor of London's Transport Strategy, 2018

Policy DV3 Healthy communities

1. Development proposals are required to maximise health benefits, minimise harm to health, and promote health equity for new and existing communities. This will be achieved by:

- a. designing for an inclusive built and natural environment, which considers and responds to the needs of the whole community regardless of age, gender or ability, and promotes physical activity where possible, including layouts that encourage walking and cycling.

providing accessible and inclusive high-quality open spaces, culturally sensitive community facilities, and an equitable urban realm that supports walking, wheeling, other forms of active travel and social interaction; and

- c. ensuring internal spaces are well-ventilated to prevent damp and mould occurring and are appropriately sized to avoid overcrowding.

2. Major development proposals are required to complete and submit a rapid Health Impact Assessment (HIA) as part of their planning application.

3. Development proposals of a scale referable to the Greater London Authority (GLA) (as set out in legislation) are required to complete and submit a detailed HIA as part of their planning application and must ensure the following is undertaken:

- a. the scope of the detailed HIA is agreed with the council's development management and public health services prior to commencement of the assessment, and at the earliest opportunity;
- b. the assessment is undertaken at an early stage of the development process and there is clear demonstration that the assessment has informed the overall design and end use(s) and occupation of the proposal;
- c. the assessment is undertaken in accordance with the council's latest HIA guidance, and responds to the latest local public health data and community insight gathered by the applicant's team; and
- d. Recommendations within the HIA are secured and monitored as part of a planning obligation.

Supporting text

11.26 Part 1 of this policy seeks to ensure development contributes towards a healthy built environment in accordance with the NPPF, the London Plan (GLA, 2021) and the objectives of the Tower Hamlets Health and Well-being Strategy (2021-2025). The policy seeks to ensure that the health impacts of all development proposals are considered at the earliest opportunity, so that the positive health benefits are maximised, and the negative health impacts are minimized. This includes mitigation against overcrowding, damp, mould and seeking to encourage more active lifestyles. It should be ensured that the needs of vulnerable groups are met by the development.

11.27 Part 2 of this policy requires major development proposals to complete and submit a rapid HIA, which should be undertaken using the council's most current HIA guidance. Definition of what constitutes a major development proposal can be found in the glossary in Appendix 1.

11.28 Part 3 of this policy requires development proposals of a scale referable to the GLA to complete and submit a detailed HIA, which should be undertaken using the council's latest HIA guidance, and the scope of this assessment agreed with the council's development management and public health services prior to commencement and at the earliest opportunity (part 3(a)). Definition of what constitutes a development proposal of a scale referable to the GLA can be found in the glossary in appendix 1. A HIA can also be submitted as part of an Integrated Impact Assessment.

11.29 As required in part 3(b), the HIA process should begin as early as possible, and it is expected to be initiated at pre-application stage so that the consideration of health can meaningfully influence proposals and how they will be used post completion. Actions should be identified



that aim to enhance the positive impacts and mitigate the negative impacts on the wider determinants of health. The outcome of these actions should be clearly identifiable within the planning application, demonstrating how the proposal has developed its design and strategy in accordance with the findings from the HIA and an engagement process with the local community.

11.30 Part 3(c) of the policy requires the HIA to be undertaken in accordance with the council's latest guidance, and respond to the latest local public health data and community insight gathered by the applicant's team. The HIA submission should visually demonstrate how the design has developed to adapt to serve these identified needs and

improve on the previous strategy.

11.31 Wherever community engagement is required as part of a HIA, steps should be made to ensure all voices, in particular vulnerable groups, are consulted upon. This is to ensure that their needs are understood and that they can inform the recommendations of the assessment.

11.32 As required by part 3(d) of the policy, recommendations within the HIA are to be secured and monitored as part of a planning obligation. This will be achieved through undertaking an independent post occupancy evaluation of residents and users of the development to assess whether the development is equitably meeting the needs of its occupants and the wider neighbourhood, identify areas for improvement and a plan of action to help elicit improvements and provide learning that informs better decisions in the future.

London Plan policies:

- GG3 Creating a healthy city

Local Plan policies:

- All policies

Evidence base:

- Tower Hamlets Spatial Planning and Health Needs Assessment, 2023
- Tower Hamlets Health and Well-being Strategy, 2021
- Tower Hamlets Joint Strategic Needs Assessment, 2017
- Healthy Streets for London, 2017
- Tower Hamlets Air Quality Action Plan, 2022
- Tower Hamlets Air Quality Annual Monitoring Report



Policy DV4 Planning and construction of new development

1. Major development proposals should sign up to the Tower Hamlets Code of Construction Practice (CoCP) and where appropriate, a constructors' forum. All construction sites in the borough should meet or exceed requirements set out in the Tower Hamlets CoCP.
2. Development proposals should undertake consultation with the council and neighbouring residents and businesses likely to be affected by their works, prior to commencement, for coordination and mitigation of disruption.
3. Development proposals should ensure consultation with the development and utility coordination team of Tower Hamlets as early as possible in the development process.
4. Major development must consider the cumulative impact of their development on the amenity of local residents and businesses in the vicinity of the site. This should be addressed through:
 - a. outlining measure to address these cumulative impacts in the Construction Management Plan (CMPs) and Site Environmental Management Plans (SEMPs).
 - b. Working collaboratively with other nearby developers and the council.
5. The Council will secure financial contributions towards coordination and integration of development activity to help address the cumulative impact of construction from sites across the borough.
6. Development is required to employ the highest standards of sustainable construction, including:
 - a. sustainable construction methods, such as the use of sustainably sourced, low embodied carbon and recycled materials; and
 - b. the use of demolished material from the development site, where practicable, in order to minimise the transportation of waste, reduce carbon dioxide emissions, and to facilitate the transition to a circular economy.

Supporting text

11.33 This policy recognises that the high levels of growth within the borough are mainly taking place alongside, or within, areas which are already densely inhabited or have been allocated for large scale development. It therefore seeks to ensure development minimises its impact on the local environment, existing and emerging communities.

11.34 Part 1 sets out how the council expects developers to sign up to the Tower Hamlets Code of Construction Practice (CoCP) and a constructors' forum (where appropriate) to better manage and mitigate the cumulative impacts arising from construction on the borough's key development sites. The Tower Hamlets CoCP seeks to set out simply and clearly what constitutes acceptable site practice within the borough. It is intended to help developers, architects, engineers and construction professionals to plan, cost and manage the environmental mitigation required to protect the health, safety and well-being of our residents and businesses.

11.35 Part 2 ensures that there is ongoing communication and regular updates, at each phase of delivery, by those responsible for the development's delivery to the Council. This aids the facilitation of development coordination.

11.36 Developers will also be expected to sign up to the Considerate Constructors Scheme (CCS), which is a national initiative which seeks to promote safe and considerate building practice and engineering works and improve standards of neighbourliness. Sites that are registered under the scheme are independently assessed and monitored against a code of considerate practice, designed to encourage higher

standards of conduct. We may also consider membership of alternative constructor schemes as also meeting the requirements of this policy. Developers are also encouraged to sign up to the Construction Logistics and Community Safety (CLOCS) standard which ensures constructors achieve the safest, leanest, and greenest construction vehicle journeys.

11.37 Part 3 requires development proposals to consult the development and utility coordinator teams of Tower Hamlets as early as possible in the development process. This is to allow the scheme to meet the requirements of the CoCP and to liaise with local utility and service providers in advance of commencement of development and to minimise disruption.

11.38 Part 4 of the policy seeks to ensure that construction impacts from the site and from other major developments within the vicinity of the proposal site are assessed and mitigation actions identified. Developers should take account of noise, vibration, artificial light, odour, air quality, fumes, dust or pollution, hours of operation, delivery timings and routes and location of equipment accordingly to reduce this impact. This should be evidenced through the Construction Logistics Plan (CLP), Construction Management Plan (CMP) and Site Environmental Management Plan (SEMP). Further guidance on producing a CLP can be found in the Sustainable Design and Construction Supplementary Planning Guidance (GLA 2014) and our latest CoCP.

11.39 Given the very high levels of construction activity occurring in already high-density locations across the borough, the council consider that strategic solutions are required to address to cumulative impacts of construction activity. This can only be achieved through collaboration between the council and other developers.

11.40 As set out in part 5, the council will secure a financial contribution towards co-ordination and integration of development activity, including leading and/or delivering projects and interventions by the council to address the cumulative impacts.

11.41 Part 6 requires development to employ the highest standards of sustainable construction. It seeks to reduce development waste and encourage the process of limiting waste to begin early in site development. The design and materials used in the construction of new buildings (including the need to choose sustainable materials, sustainable construction methods and incorporate circular economy principles) can make a significant difference to the energy requirements and associated level of carbon emissions. Sustainable construction methods include volumetric building, panelised systems and offsite manufacture (Modern Methods of Construction) which all have benefits in terms of limiting waste and increasing build quality and providing the opportunity for design for disassembly. Evidence of a commitment to low carbon and low emission energy sources for construction and related transport should also be demonstrated. Applicants should evidence how the development will meet the requirements set out in Part 5 of the policy in the design and access statement and/or the sustainability statement, as part of the planning application. More detailed guidance can be found in the Sustainable Design and Construction Supplementary Planning Guidance (GLA 2014) and the Circular Economy Statement LPG (GLA 2022).

London Plan policies:

- SL1 Improving air quality
- SL2 Minimising greenhouse gas emissions
- SL7 Reducing waste and supporting the circular economy

Local Plan policies:

- PS1 Design and infrastructure-led approach to development
- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- CG4 Embodied carbon, retrofit and the circular economy
- CG10 Air quality
- CG11 Noise and vibration
- MC1 Sustainable travel
- MC3 Impacts on the transport network
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Tower Hamlets Code of Construction Practice, 2023
- Circular Economy Statement LPG, 2022
- Control of Dust and Emissions SPG, 2014
- Sustainable Design and Construction Supplementary Planning Guidance (GLA 2014)

Policy DV5 Developer contributions

1. Development proposals will be required to:
 - a. pay Community Infrastructure Levy (CIL) charges required by any charging schedules which are in operation for the area within which the development is located, including the Mayor of London's Community Infrastructure Levy (MCIL);
 - b. enter into Section 106 agreements to provide affordable housing and make provision to mitigate the impacts of the development where necessary or appropriate, having regard to any relevant policies, supplementary planning documents or guidance; and submit a financial viability assessment as part of the planning application, where required, which may be subject to scrutiny by the council/appointed consultants, at the applicant's expense, where they do not meet planning policy requirements or do not propose to deliver required Section 106 planning obligations.
2. Proposal which seek to provide CIL-in-kind in exchange for the delivery of strategic infrastructure are required to:
 - a. provide robust justification for CIL-in-kind in comparison to contributions towards strategic infrastructure;
 - b. set out in detail the proposed type of infrastructure which would qualify as CIL-in-kind; and
 - c. engage early in the development process with the council's infrastructure planning team.
3. Where development proposals are seeking CIL-in-kind in exchange for the delivery of strategic infrastructure, discussions should be opened with the council at the earliest possible opportunity to determine what kinds of infrastructure will be granted CIL-in-kind on the site.
4. Vacant building credit has the potential to adversely impact our ability to meet the affordable housing target and will not apply in the borough. This policy acts as an exemption from its application in Tower Hamlets.

Supporting text

11.42 In order to ensure that the policies and infrastructure requirements of the Local Plan are delivered in a way that achieves sustainable development, we will seek contributions from developers to fund improvements to infrastructure and the environment. Contributions will be made through the Community Infrastructure Levy (CIL) (which applies a standard charge to developers to fund supporting infrastructure such as transport, schools, health and community facilities) and/or Section 106 agreements (which address the provision of affordable housing and site-specific infrastructure or development mitigation requirements).

11.43 The spatial vision and objectives emphasise the importance of managing growth and shaping change. This puts planning for infrastructure at the heart of the Local Plan, ensuring that new development in the borough contributes towards the provision of infrastructure that is needed to support growth and enable everyone in the borough to benefit from the opportunities this infrastructure will bring.

11.44 Developer contributions can help to contribute to the success of a development and the needs of the wide community in line with the key priorities set out in the Local Plan vision. For instance, they can enhance the benefits that arise from a development to the local community and equally ensure it does not give rise to unacceptable development impacts.

11.45 The council will work collaboratively with our partners to deliver the infrastructure necessary to support the growth and development identified within the Local Plan, understanding the contribution that this

growth can make to achieve the wider objectives of the plan and other relevant strategies. The Infrastructure Delivery Plan (IDP) identifies the types of infrastructure required to support the anticipated growth in the borough, and additional infrastructure requirements will be identified during the course of the plan period as appropriate. The IDP sets out the projects across a range of infrastructure requirements which will help deliver the infrastructure needed to serve existing and emerging communities and businesses. The IDP is periodically updated to ensure it is responsive to the infrastructure requirements of the borough. These updates will be undertaken in consultation with both internal and external stakeholders such as service areas and infrastructure providers.

11.46 In order to implement Part 1(a), development must follow both the borough-wide Community Infrastructure Levy (CIL) charging schedule, or any subsequent adopted version; and the Mayor of London's Community Infrastructure Levy (MCIL) charging schedule, or any subsequent adopted version, and supplementary planning guidance.

11.47 The borough-wide CIL (revised and adopted in January 2020) will be used to deliver infrastructure to address the cumulative impact of development in the borough. Necessary items required to mitigate the impact of development such as affordable housing, may be secured through Section 106 obligations.

11.48 The MCIL will help fund strategic transport projects. We collect these receipts from developments in Tower Hamlets and pass them onto Transport for London (TfL). Developments in the borough may be liable for both the Mayoral and borough-wide CIL and, in certain circumstances, pursuant to supplementary planning guidance,

11.49 Part 1(b) seeks to address the use of Section 106 planning obligations to secure the provision of affordable housing and mitigate the impact of development where these cannot be addressed through planning conditions or the CIL. Section 106 planning obligations will be sought where they are:

- a. necessary to make the development acceptable in planning terms;
- b. directly related to the development; and
- c. fairly and reasonably related in scale and kind to the development.

11.50 The measures sought through a planning obligation will vary depending on the nature and scale of a development, its location and impacts. Further information about the requirements for obligations are included throughout this plan. The Planning Obligations Supplementary Planning Document (SPD) provides detailed guidance on our approach to planning obligations. Development which is subject to a Section 106 agreement should apply the SPD, and will be assessed on an individual basis. The obligations identified in the Local Plan and Planning Obligations SPD are not an exhaustive list and the council may wish to negotiate other forms of planning obligations which meet the CIL Regulation 122 tests depending on the individual circumstances of a site and scheme. The methodologies for calculating certain financial obligations are set out in Appendix 2.

11.51 A monetary contribution to cover the monitoring of planning obligations will be secured. This will be calculated on a case-by-case basis, taking into account the nature of the proposed development, obligations secured, and the estimated cost of monitoring.

11.52 Financial contributions may be sought financially or 'in kind' –

where the developer builds or directly provides the matters necessary to fulfil the obligation negotiated as part of the planning application. Where provision is made within developments, this will be credited to the scheme and may offset financial contributions that may otherwise be sought. In-kind delivery of planning obligations will be at the discretion of the council and only in appropriate circumstances.

11.53 Part 1(c) aims to ensure developers maximise contributions towards the delivery of affordable housing and infrastructure in line with the vision and objectives of the plan, whilst still ensuring development can be delivered. Development should follow the guidance set out in the financial viability appraisals and must comply with the Mayor of London's Affordable Housing and Viability London Plan Guidance and the Tower Hamlets' Development Viability SPD. This sets out how the Local Plan policies should be applied in a development viability context when determining planning applications. It aims to provide greater clarity to both applicants and the public and ensure that the principles of sustainable development are at the forefront of decision-making in Tower Hamlets.

11.54 Financial viability is a key consideration in terms of the application of Section 106 planning obligations, and where development does not meet planning policy or propose to provide required planning obligations, financial viability assessments are required to be submitted in accordance with the prevailing local validation requirements checklist or any relevant supplementary planning document. The issue of financial viability should be considered at the earliest opportunity. If an applicant is engaged with us in this regard prior to the submission of a planning application, then the chances of a positive outcome for all sides are greatly increased.

11.55 In the exceptional circumstances where viability constraints prevent the delivery of all policy requirements, there may be some site-specific exceptions where an alternative prioritisation is considered more appropriate. Where necessary to deliver the provision of infrastructure required as part of a site allocation or considered necessary by internal or regional consultees, and proven via viability evidence, additional sources of funding to enable the delivery of the required infrastructure may be identified by the council.

11.56 Part 2 sets out that developments which seek CIL-in-kind will need to be supported by information which justifies and sets out what the CIL-in-kind comprises and how this equates to the strategic infrastructure development contribution. Part 2 emphasises the importance of early discussions with the council in instances where developers are seeking CIL-in-kind. In some instances, the delivery of strategic infrastructure as part of a development proposal may make the development eligible for CIL-in-kind, but this will be at the discretion of the council, following discussions with the Infrastructure Planning team.

11.57 Part 3 sets out our approach to the application of the vacant building credit, which provides an incentive for brownfield development on sites containing vacant buildings. Viability evidence finds there is no need to apply the vacant building credit mechanism in the borough to 'kick start' development (Tower Hamlets Local Plan Viability Assessment 2017). In addition, the effect of the vacant building credit will be to reduce affordable housing contributions and this is contrary to our need to deliver affordable housing through the planning system. The Affordable Housing and Viability Supplementary Planning Guidance (GLA, 2017) sets out the extent to which vacant building credit should be applied in London and concludes that its application is unlikely to be suitable in London.

London Plan policies:

- D2 Infrastructure requirements for sustainable densities
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H7 Monitoring of affordable housing
- T9 Funding transport infrastructure through planning

Local Plan policies:

- HC1 Meeting housing needs
- HC2 Affordable housing and housing mix
- HC7 Purpose-built student accommodation
- HC8 Large-scale purpose-built shared living
- CG1 Mitigating and adapting to a changing climate
- CG2 Low energy buildings
- CG3 Low carbon energy and heating
- CG4 Embodied carbon, retrofit and the circular economy
- CG8 Water efficient design
- EG3 Affordable workspace
- CI1 Supporting community facilities
- RW2 New and enhanced waste facilities
- MC3 Impacts on the transport network
- MC4 Parking and permit free
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Planning Obligations SPD, 2021
- Development Viability SPD, 2017
- Affordable Housing and Viability SPG, 2017
- Tower Hamlets Infrastructure Delivery Plan

Policy DV6 Social value

1. The council will support opportunities to maximise the delivery of social value to positively contribute to additional social, economic, environmental and community benefits, including economic well-being, social inclusion, equal opportunity, and community cohesion.
2. Major development proposals are required to submit a social value strategy which clearly sets out how social value will be achieved through the construction and operation of the proposed development. The social value strategy must identify how:

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the social value contribution is proportional to the scale of the development; and

the development will support social inclusion, economic well-being, equal opportunity and community cohesion throughout its lifecycle. This shall include demonstrating how the development will maximise wider social value contributions across the following themes:

- i. reducing poverty and promoting equality and cohesion in Tower Hamlets;
- ii. boosting local jobs, skills, opportunities, and economic inclusion (including careers and social mobility);
- iii. inclusive growth and strengthening the local economy;
- iv. empowering communities to become more resilient and increase participation; and
- v. working towards a clean and green future.

3. Where appropriate, the delivery of social value interventions will be secured by planning obligation. Social value interventions will be treated separately to planning obligations required by other policy such as affordable housing or employment and training requirements.
4. The implementation of social value interventions is secured and compliance is monitored as part of a planning obligation.

Supporting text

11.58 Part 1 of the policy sets out the council's intention to maximise the delivery of social value through development, ensuring positive contribution to community benefits including economic well-being, social inclusion, equal opportunity, and community cohesion.

11.59 Part 2 of the policy sets out the requirement for major development proposals to submit a social value strategy. The social value strategy shall identify how the development will deliver social value benefits throughout its lifecycle including during its construction and operational phases, demonstrating that social value delivery has been integrated into the design of the scheme. The strategy will ensure that the development will maximise its positive contribution to economic well-being, social inclusion, equal opportunity, and community cohesion based on site-specific analysis and consultation. Such strategies can be informed by the councils' most up to date guidance on social value in development.

11.60 Part 2(a) requires the social value contribution of a development proposal to be proportional to the scale of development. The social value strategy should demonstrate this and should be introduced as early as possible, so that the consideration of social value can meaningfully influence proposals. Therefore, it is strongly encouraged that the strategy is considered at pre-application stage, should the applicant seek that service. At the design/ pre-application stage it is expected that the social value strategy will be of a higher level, setting out social value goals and identifying when these will be delivered throughout the lifecycle of the scheme. Subsequently, prior to commencement, it is expected that the social value strategy will have been refined and developed in more detail, setting out the social value outcomes that will be delivered by the development.

11.61 Social value should be considered early in the development process and applicants should engage with the council's development management and infrastructure planning teams.

11.62 Part 2(b) requires the social value strategy to demonstrate how the development proposal will support social inclusion, economic well-being, equal opportunity, and community cohesion throughout its lifecycle. To demonstrate this, the strategy should provide a structure as to how social value will be implemented through each stage of the proposal, setting-out clear goals and implementation strategies and outlining measurable targets to ensure effective monitoring, reporting, and assessment.

11.63 The social value strategy will outline how site-specific local needs analysis and community engagement was conducted to understand and co-design what social value could be added through the lifecycle of the development, in response to a real, evidence-based need to benefit the surrounding local community. The Council's development management and infrastructure planning team will offer guidance on groups which could be suitable to be part of the co-design process. Guidance on co-design and community consultation is set out in the Optimising Site Capacity: A Design-led Approach LPG (GLA, 2023).

11.64 The social value strategy will focus on the themes set out in part 2(b), which have been developed in accordance with both national approaches and best practice for measuring social value (including the National TOM's framework) and the priorities set out in the Tower Hamlets Strategic Plan 2022-26:

- i. reducing poverty and promoting equality and cohesion in Tower Hamlets: upholding the council's commitments to reducing poverty and inequality across the borough (including the impacts of the cost-

of-living crisis), as well as promoting diversity and cohesion;

- ii. boosting local jobs, skills, opportunities, and economic inclusion: creating high-quality jobs, training opportunities, and skills and careers support for local people, with a particular focus on those facing barriers to employment;
- iii. inclusive growth and strengthening the local economy: positively contributing to the local economy through inclusive placemaking, supporting local and independent businesses, progressive procurement activities and promoting responsible business practices amongst supply chains;
- iv. empowering communities to become more resilient and increase participation: proactively engaging with local people and businesses (with a particular focus on underserved communities and groups) to shape proposals, and investing in communities to become more resilient through initiatives that will improve safety, health, and well-being; and
- v. working towards a clean and green future: implementing policies and initiatives that support the council's vision to become a carbon neutral borough, improving air quality and reducing waste (including promoting the circular economy).

11.65 It is acknowledged that existing planning obligations would sit in some of the themes above and therefore already provide some social value benefits to the local community. However, the content of the social value strategy should be independent of these, and target areas that the planning obligations do not address, to provide additionality and to complement any existing obligations. The strategy should be project specific, allowing flexibility for each development to develop a social

value strategy that is informed by its site-specific local needs analysis and consultation.

11.66 Examples of potential social value contributions, that should be project specific:

- spatial and environmental improvement works that improve health and well-being, adopt gender inclusive design, and create safer spaces;
- encouraging more local representation in Design Review Panels (including upskilling local residents to participate) – with a particular focus on underrepresented communities and groups;
- contributions (including donations, resources and staff volunteering) to local community projects that tackle poverty and the cost-of-living crisis;
- providing training and skills opportunities (including internships, work experience and graduate placements) for individuals facing barriers to employment i.e. long-term unemployed, Young People Not in Education, Employment or Training (NEETs), care leavers, ex-offenders, and residents with special educational needs and disabilities (SEND residents);
- careers and social mobility initiatives – including engaging with local schools and colleges to deliver work experience placements, career talks, and site visits for young people;
- delivering support and advice for small and independent businesses and voluntary, community and social enterprises (VCSEs) – for example, workshops on fit-out and design;
- making procurement opportunities more accessible for local small and independent businesses throughout the development lifecycle – including VCSEs and diverse business owners;

- ensuring suppliers pay London Living Wage and commit to responsible business practices;
- protecting the environment and mitigating the impacts of climate change through all aspects of the development, not just the built form – for example, by committing to encouraging active travel and using sustainable delivery methods;
- promoting positive health and well-being in the community and for employees;
- contributions (including donations, resources, and staff volunteering) to local tackling poverty initiatives, local community groups, VCSEs and charitable organisations; and
- community engagement activities to measure happiness and well-being of occupiers and people that use the development upon completion.

11.67 Part 3 of the policy sets out how social value commitments outlined in the strategy will be considered independently and as additions to complement any other planning obligations or contributions, and will be secured via a planning obligation to ensure the implementation of any approved social value strategy, requiring where appropriate that compliance with the relevant parts of the strategy is confirmed prior to the commencement and the occupation of the development.

11.68 As required in part 4 of the policy, the social value observations will be secured and monitored as part of a planning obligation. This will include monitoring and review of expected outcomes prior to, during and post construction.

London Plan policies:

- GG1 Building strong and inclusive communities
- GG3 Creating a healthy city
- GG5 Growing a good economy
- D5 Inclusive design
- D8 Public realm
- E3 Affordable workspace

Local Plan policies:

- All policies

Evidence base:

- Good Growth Principles in the London Plan

Policy DV7 Utilities and digital connectivity

1. All strategic development proposals must ensure there is sufficient utilities infrastructure capacity, (including electricity, heat, water supply, digital connectivity, and drainage) to meet demand during construction and operation. To do this, major development proposals will be expected to:

- a. engage with the Council on the content of a utilities statement which sets out the requirements for utilities and services infrastructure which are necessary to service the development;
- b. undertake engagement with utilities and service providers at the before submitting of a planning application to ensure the construction approach and end design of the development address utilities providers' requirements, and to ensure utilities networks and connections can serve the development;
- c. provide evidence of the engagement to the council, along with relevant load and consumption data and proposed routing, in a utilities statement for review and coordination; and
- d. demonstrate that the spatial, visual, amenity, and environmental impacts of new, expanded, or reconfigured utilities and services infrastructure will be avoided, remedied, or mitigated.

2. Major development proposals must prioritise connections to decarbonised heat networks to support the delivery of net zero carbon emissions solutions for clean, green, and integrated energy systems. Development with significant heat rejection, such as data centres, must be built ready to supply waste heat to a heat network, including all necessary on-site infrastructure required to facilitate a future connection.

3. Major development proposals are required to deliver Fibre To The Premises (FTTP) broadband and where possible mobile telecoms, small cell 5G and 6G digital infrastructure. A digital infrastructure statement must be submitted as part of the utilities statement to demonstrate how this will be achieved, which should:

- a. establish how FTTP will be provided to serve the development and that it will be engaged at first occupation and be of a sufficient standard to meet the requirements of future occupiers of the development; and
- b. Where required demonstrate the impact on the digital connectivity of existing residents, businesses and local communities.

4. For all other residential and employment development proposals, FTTP will be encouraged by the council as a means of expanding the local fibre network.

Supporting text

11.69 This policy seeks to ensure that new homes and developments in Tower Hamlets are supported with sufficient utilities and service infrastructure, and new developments have access to clean energy, heat, water and sewerage, mobile connectivity and fast broadband connections. Recent studies undertaken by the Tower Hamlets Infrastructure Delivery Coordination Pilots Programme (IDCPP) have found that the traditional methods of utility and services procurement are not an efficient solution with which to support new growth and development, including the decarbonisation of our energy and transport systems. Although progress has been made on improving the energy and water efficiency of new developments to better manage utilities demand, additional connections to utilities and services are still required.

11.70 Council engagement with developers has demonstrated there is a need to coordinate approaches with local utilities providers for the planning of utilities and connections. This will deliver improved efficiency for the delivery of utilities and minimise delays to developments and their utilities connections. Site utility information should therefore be shared with the council to achieve this objective.

11.71 Part 1 (a) requires that strategic development proposals submit a utility statement, which considers the relevant utilities needed to service the proposed development. The framework and contents for utility statements will be informed by the most current guidance at the time of the development proposals assessment. It is recommended that advice on the contents of the utilities statement is sought in advance of the submission of a development proposal ideally in advance of submission of a planning application or at pre-planning stage and engagement with

the council's infrastructure planning team is recommended. The scope or necessity of the components a utility statement can be determined as a result of such engagement with the Council.

11.72 Part 1(b) requires strategic development proposals to engage with utilities providers at the earliest opportunity in the design and construction process. This includes water supply, wastewater drainage and the SuDS Approval Body, electricity and energy including heat network operators, digital connectivity, and mobile communications. Development proposals should be supported by evidence of this engagement. This is to ensure there will be sufficient utilities and service capacity to meet the increased demand, and that the predicted demand increase will not impede the utilities availability for current or predicted future growth.

11.73 Part 1(c) requires strategic development proposals to submit a utility statement in line with the scope set out in Part 1(B) for assessment as part of their application, to support the coordinated delivery of utilities capacity, maximise efficient routing, and reduce the impacts of connection installations. Aggregated information from utility statements will allow early conversations with utility and service providers that inform their capacity and route planning, supporting on-time delivery and coordination and reduce disruption, which could not be achieved through applications by individual developers.

11.74 Utility statements should set out the expected demand and present evidence received from utility and service providers in the consultation that there is sufficient capacity to meet their development's as well as further projected growth needs.

11.75 As a minimum, utilities statements should include:

- location and size of existing utilities and services;
- proposed connection points routes to/from the site and site entry points;
- equipment required on and off-site to allow the connection;
- cover water, electricity and energy supplies, drainage and digital connections;
- make reference to other relevant reports and provide overview of key information, such as the drainage strategy;
- provide connection sizes, peak loads, annual demands, volumes, capacities as required for applications with each provider;
- describe function, operation and key maintenance of each item;
- provide a programme for works; and
- cover construction and occupation including phasing where applicable.

11.76 Developments which result in offsite upgrades will be subject to conditions to ensure occupation is aligned with the delivery of the required utilities infrastructure. Developments with exceptionally high utilities demands, such as data centres, must demonstrate that these requirements will not undermine the deliverability of planned homes and developments in the borough. Where this cannot be demonstrated, development proposals may be refused, or be subject to providing sufficient capacity ahead of delivery.

11.77 Part 1(d) requires applicants to demonstrate that new or expanded utilities infrastructure will not have any negative impacts to amenity or environment, such as noise, odour or vibration, or that any identified

impacts will be mitigated. Design of new utilities infrastructure should be considered, particularly where infrastructure is delivered in close proximity to existing or proposed developments, to integrate utilities into the urban landscape.

11.78 Part 2 of this policy identifies the need for new developments to connect to heat networks. All heat sources, including ambient and waste heat and significant heat rejection, present opportunities to decarbonise the borough's heating systems and achieve its net zero carbon emissions target. All new developments that emit waste heat must ensure on-site provision is made to future-proof an easy connection to future heat networks. This includes the provision of heat exchangers, thermal stores, pipework connections at the site boundary, and heat supply agreements to heat network operators. Heat network operators supplying to residential properties shall be registered participants in the Heat Trust scheme and each heat network shall be a Heat Trust registered scheme. Where existing heat networks have not decarbonized, sleeving shall be applied for the connection of new development.

11.79 In addition, a new primary electrical substation will be required on the Isle of Dogs by 2030 as identified in the Opportunity Area Framework and the Isle of Dogs Feasibility Study (Electrical Connectivity) to support ongoing development as well as the electrification of heat and transport and to reduce the pressure on the congested electrical routes currently supplying the island. This will be established on the site of a customer requiring electrical connection.

11.80 Parts 3 and 4 of this policy pertain to the delivery of digital infrastructure. Digital infrastructure plays a vital role in our daily lives which enables people to access the connectivity and services they

need where they live, work or travel. The council considers that digital infrastructure, including the delivery of Fibre To The Premises (FTTP) (also called full fibre gigabit broadband), existing 4G and 5G mobile telecoms and future wireless technologies including 6G, to be essential infrastructure to support the delivery of sustainable development. Part R1 of the Building Regulations 2010 requires buildings to be equipped with at least 30 MB/s ready in-building physical infrastructure, however new developments using full fibre to the property or other higher-grade infrastructure can achieve connectivity speeds of 1GB/s. Developers should engage early with a range of network operators, to ensure that development proposals are designed to be capable of providing this level of connectivity to all end users. Mechanisms should also be put in place to enable further future infrastructure upgrades. Innovation is driving reductions in the size of infrastructure, with marginal additional unit costs, but greater digital connectivity is needed in more locations.

11.81 This policy seeks to ensure that development proposals provide the necessary standards and do not have a negative impact on digital connectivity within the borough for existing residents and local people, as well as future occupiers. As well as achieve national ambitions to deliver gigabit broadband to at least 99% of premises nationwide and coverage of standalone 5G to all populated areas of the UK by 2030.

11.82 Further guidance on delivering digital infrastructure is set out in the Tower Hamlets Digital Infrastructure Strategy (2022) and the GLA Sub-regional Digital Strategy (emerging). Development proposals should consider the most up-to-date digital and utility guidance published by the council at the time of their assessment.

London Plan policies:

- S13 Energy infrastructure
- S15 Water infrastructure
- S16 Digital infrastructure

Local Plan policies:

- All policies

Evidence base

- Proposals for heat network zoning, 2022
- London Heat Network Manual II, 2021
- Sub-regional Integrated Water Management Strategy (SWIMS) for East London, 2023
- Isle of Dogs and South Poplar Integrated Water Management Plan (IWMP), 2020
- Isle of Dogs, South Poplar and Leaside Local Area Energy Plan, 2022
- Tower Hamlets Surface Water Integrated Management Strategy
- Isle of Dogs and South Poplar Opportunity Area Framework, 2019
- Isle of Dogs Feasibility Study (Electricity Connectivity), UKPN, 2023
- UK Digital Strategy, 2022
- Sub-regional Digital Strategy
- Digital Infrastructure Strategy and Action Plan: Isle of Dogs, South Poplar, and Lower Leaside Areas, 2022
- Utilities and Heat Network Topic Paper, 2024
- Foul Sewerage and Utilities Statement

Policy DV8 Site allocations

1. Development proposals on site allocations should meet the following requirements:
 - a. apply all Local Plan policy requirements unless specified through the site allocation text;
 - b. deliver required infrastructure on earlier phases of development as far as possible;
 - c. open discussions with the council at the earliest possible opportunity, where CIL-in-kind is sought in exchange for the delivery of strategic infrastructure, to determine what kinds of infrastructure will be granted CIL-in-kind on the site;
 - d. provide new publicly accessible open space of at least 0.4ha, and where family housing on allocations is delivered, it should be delivered in close proximity to the open space;
 - e. where strategic publicly accessible open spaces are required in the site allocation text, they must consist of at least 1 hectare of contiguous open space, and must be additional to other local plan open space requirements;
 - f. provide a buffer zone of 8m to fluvial watercourses and 16m to tidal watercourses; and
 - g. on sites with decommissioned gasholders, the space taken up by the gasholders is not considered to be employment space, and so employment floorspace does not need to be re-provided as part of redevelopment for this floorspace.

Supporting text

11.83 This policy sets out some requirements that apply to all of the site allocations included in the plan.

11.84 Part 1(a) specifies that the local plan must be read as a whole, and allocations should not be treated as isolated sets of requirements that sit outside of the other planning policies in this document. For reasons of efficiency, the site allocations do not set out standard requirements relating to issues like the delivery of affordable housing, biodiversity improvements, the improvement of air quality, or many other topics covered in the local plan policies – these requirements should be assumed to apply unless the site allocation text specifies that they do not.

11.85 The site allocations set out required infrastructure that must be delivered to make a development acceptable, and part 1(b) emphasises that the delivery of this infrastructure, including sustainable transport improvements, should be focused on the earlier phases of delivery where possible. It is accepted that not all infrastructure will be able to come forward at the very start of development, but there should be a general principle that the delivery of infrastructure is front-loaded to ensure that the needs of the community will be met as new residents move into a development.

11.86 Part 1(c) sets out the council's approach to the delivery of social infrastructure such as health, educational, and community facilities on site allocations. The site allocations in this plan will be delivered over a long period of time, and it is possible that needs which are forecast at the time of preparing the plan may not materialise over the fifteen years of the plan period. This can particularly be the case for schools, where future pupil numbers and demographic trends can be difficult



to accurately predict. The council has therefore taken a precautionary approach to allocating social infrastructure in this plan, and when applications for development on site allocations come forward discussions should be held with the council at the earliest possible opportunity to determine whether the social infrastructure needs have changed since the time when the plan was prepared. In some cases, it may prove that a particular piece of social infrastructure is no longer needed, but the need for another kind of infrastructure has increased and this can be delivered instead. In other cases, it may be that there is no further need for social infrastructure on a particular site, and

alternative uses can be considered. This will need to be assessed on a site-by-site basis, which is why developers are encouraged to begin early discussions around this.

11.87 Part 1(d) sets out that all site allocations in the plan are expected to deliver some new publicly accessible open space. Some site allocations specify that a strategic open space should be delivered, and this is elaborated in part 1(e). For allocations that do not specify the need for a strategic open space, publicly accessible open spaces that meet local needs should be delivered instead, with a target of delivering at least 0.4 hectares across the site (it is acknowledged that on smaller allocations this level may not be achievable, however some amount of new publicly accessible open space is expected to be provided and discussions should be opened with the council at the earliest opportunity to discuss this). In all cases, family housing within site allocations should be delivered in close proximity to publicly accessible open space.

11.88 Part 1(e) explains that for publicly accessible open space to count as strategic infrastructure (and therefore to meet the requirements of site allocations that include open space as required infrastructure, and to potentially be liable for CIL-in-kind), it must consist of at least 1 hectare of contiguous open space. Smaller, non-contiguous open spaces, even where they add up to a total of 1 hectare across a site, will only be considered to meet local needs for open space, not strategic needs. This applies even where such spaces are claimed to be connected via green routes or pedestrianised pathways. All publicly accessible open space should be additional to other open space requirements in the Local Plan, such as communal amenity space and play space requirements – spaces that are counted towards the required total of communal amenity space or children’s play space

cannot also be counted towards the provision of new publicly accessible open space.

11.89 Development which is in proximity to watercourses must incorporate buffer zones to support the incorporation of flood risk management into development proposals.

11.90 There are some site allocations that contain decommissioned gasholders, and part 1(g) specifies that the floorspace taken up by the gasholders is not considered to count as employment space for the purposes of policy EG4, and therefore there is no expectation that this floorspace needs to be re-provided as an employment use in any redevelopment. Any other existing employment use on such sites will still need to be re-provided.

11.91 In addition to these requirements, it should be noted that some of the site allocations in the Leaside sub-area originated in the London Legacy Development Corporation Local Plan. As part of the process of developing this local plan, the requirements for these sites and any adopted guidance related to them will be reviewed and may be updated.

London Plan policies:

- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- G4 Open space
- SI 12 Flood risk management

Local Plan policies:

- All policies

Evidence base:

- Optimising Site Capacity: A Design-led Approach LPG, 2023

12. Homes for the community



HF1 – Meeting housing needs

HF2 – Affordable housing and housing mix

HF3 – Protection of existing housing

HF4 – Supported and specialist housing and housing for older people

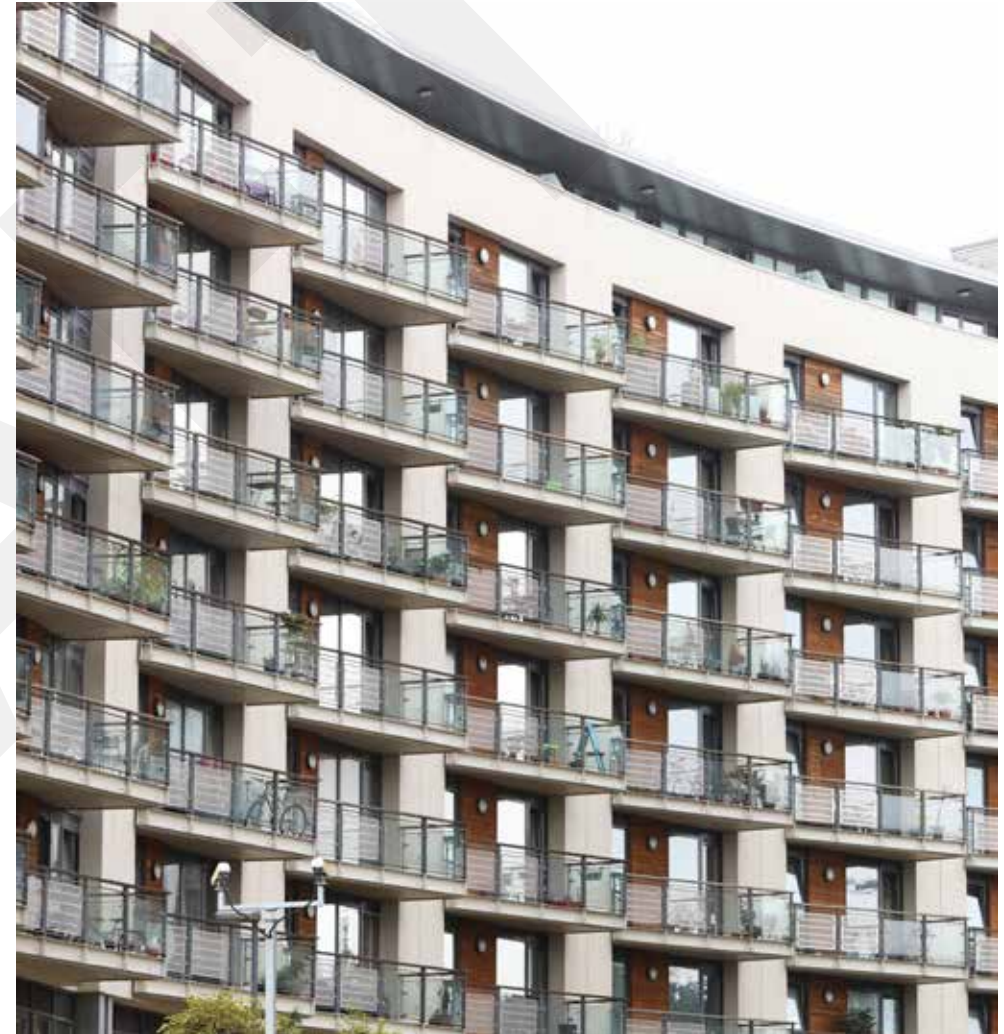
HF5 – Gypsy and traveller accommodation

HF6 – Purpose-built student accommodation

HF7 – Large-scale purpose-built shared living

HF8 – Housing with shared facilities (houses in multiple occupation)

HF9 – Housing standards and quality



Introduction

12.1 Tower Hamlets is facing an acute housing shortage, with a particular lack of social rented homes to meet the needs of local residents. This leads to overcrowding, as residents are unable to move into their own accommodation and need to live with family, friends, or shared homes even when these circumstances lead to health and well-being issues.

12.2 The borough's strategic ambition is to ensure that everyone in Tower Hamlets lives in a good quality home that they can afford. To meet this need, this plan seeks to enable the delivery of an ambitious number of new homes, with a focus on larger, family-sized social rented homes, as this has been identified as the area of most acute need. This chapter sets out the policies that will support the borough in meeting these needs.

12.3 In addition to increasing the overall supply of new homes in the borough, there is also an acute need to ensure that all homes are of a good quality and meet the needs of their residents. This chapter includes policies that support the development of good quality homes that meet the needs of a wide variety of residents. It also supports the development of specialist housing that supports the needs of particular groups, such as older residents, those with special needs, and those experiencing homelessness. To meet this need, Policy HF2 imposes a requirement for development proposals to provide affordable housing, with rates varying depending on the nature of the development.

12.4 All parts of the borough are expected to experience redevelopment or intensification to increase densities in recognition of the substantial need for new housing. The areas with the greatest identified opportunities for growth are the areas designated as Opportunity Areas in the London Plan:

- a. Isle of Dogs and South Poplar sub-area: the places of Canary Wharf, Blackwall, Leamouth, and northern parts of Millwall and Cubitt Town;
- b. City Fringe sub-area: the places of Whitechapel, Wapping, and Aldgate; and
- c. Leaside sub-area: the places of Poplar Riverside and Poplar, and the area of the LLDC which sits within Tower Hamlets.

12.5 Additionally, significant opportunities exist outside of these areas, which this plan seeks to harness.

Policy HF1 Meeting housing needs

1. The council will secure the delivery of at least 52,095 new homes across the borough between 2023-2038. This will be achieved through:
 - a. promoting the delivery of new housing in locations across the borough, particularly within the borough's opportunity areas, highly accessible locations, and site allocations (as shown on the policies map);
 - b. supporting new housing delivery on sites below 0.25 hectares (small sites) in size;
 - c. supporting new housing delivery on windfall sites (land not allocated within the Local Plan);
 - d. supporting estate regeneration schemes;
 - e. supporting proposals that would bring back into use long-term empty homes and derelict empty homes; and
 - f. supporting development proposals for housing as a
2. The council will prioritise the delivery of affordable homes across the borough and require developments to contribute towards the creation of sustainable, mixed, and inclusive communities that respond to local and strategic need. This will be achieved through:
 - a. securing affordable homes from all residential development proposals; and
 - b. requiring a mix of unit sizes and tenures to meet local need on all sites providing new homes.
3. The council will prioritise the delivery of self-contained (Class C3) homes in new residential developments when assessing development proposals for non C3 forms of housing.
4. Where they can deliver on the requirements of part 2 of this policy, the council will support development proposals which seek to meet the needs of specific groups:
 - a. families with children;
 - b. for those who rent their homes;
 - c. older people;
 - d. key workers and service families;
 - e. communities seeking to commission or build their own homes; and
 - f. students in appropriate locations.
5. The council will support development proposals that meet the needs of:
 - a. Disabled and vulnerable residents and those who need specialist housing;
 - b. Gypsy and Traveller communities; and
 - c. Emergency accommodation.
6. The council will expect residential development proposals to be of a high quality, sustainable, and take appropriate account of cumulative development.

Supporting text

12.6 Part 1 of this policy sets out the strategic housing targets¹ for Tower Hamlets as well as our objectives of ensuring the creation of mixed and inclusive communities, sustainable places, and quality living environments within the borough.

12.7 The borough's housing target relates to total net housing supply. The strategic target is composed of the housing supply target of at least 34,730 new homes between 2019/2020 and 2028/2029 – established in policy H1 Increasing housing supply of the London Plan (GLA, 2021) – with the period beyond this being informed by the later phases of London Plan Strategic Housing Land Availability Assessment (SHLAA) 2019. The target includes self-contained residential units and non-self-contained residential accommodation, including specialist housing for older people, people with specialist care needs and students in use Classes C2, C3 and C4 or sui generis.

12.8 A proportion of the London Legacy Development Corporation's housing target as set by the London Plan 2021 is located within the boundary of Tower Hamlets. The delivery of this proportion will be supported through the adoption of the LLDC's site allocations in the Tower Hamlets Local Plan, extant masterplans and planning permissions.

12.9 Significant housing growth opportunities are identified in the locations specified in Part 1(a),² supported by capacity assessments of allocated sites. The borough's limited area requires optimising deliverable capacity in other locations across the borough. This will be achieved through a number of different mechanisms: the regeneration of previously developed land, the intensification of the built form in



opportunity areas, windfall developments, the delivery of small sites and appropriate development in highly accessible locations along transport corridors.

12.10 Part 1(b-e) supports the delivery of housing through town centre intensification, estate regeneration, and infill development on sites less than 0.25 hectares, bringing back long-term vacant properties into residential use and the development of windfall sites.

¹ Housing Land Supply Topic Paper

² Allocated sites and opportunity areas

12.11 Part 1 (d) acknowledges that the regeneration of existing housing estates will play a role in delivering the homes the borough needs. Such regeneration should not only seek to deliver an increased number of new affordable homes but to result in improved and expanded social facilities, enhancement of environmental amenity, open space and public realm that responds to the resulting increase in demand generated by the increased number of residents in the regenerated estate. Such schemes should be guided by the Council's Estate Regeneration Pathway and engage early in the design process with the Council's regeneration team.

12.12 Part 1(e) recognises that the borough contains a stock of vacant and derelict homes. In order to meet housing needs, it will be essential to bring these homes back into use. Grants are available from the council to allow owners to carry out works to homes to bring them back into use, and council tax penalties are imposed on homes that have been left empty for more than two years.

12.13 Part 1(f) regarding housing as a temporary meanwhile use, will be supported in locations which are appropriate for residential development and meet the requirements of all applicable policies. The temporary use of land for residential purposes is supported by London Plan Policy H3 Meanwhile use as housing. It is expected that such developments will be time limited to ensure that the long-term intended use of a site is ultimately delivered.

12.14 Part 2 sets out how development proposals should create mixed and inclusive communities through providing affordable housing and a range of different sized homes, with a focus on addressing overcrowding in the borough through delivering family/larger sized affordable (social) units as part of all developments.

12.15 Part 3 recognises that the acute need for more standard C3 housing in the borough means that the supply of this type of housing will normally be prioritised over other types of housing such as purpose-built student accommodation and large-scale purpose-built shared living. These types of housing are addressed in more detail in policies HF6 and HF7 respectively.

12.16 Part 4 recognises our duty to create a policy framework to enable the quality delivery of homes for families with children, those who rent their homes, older people, key workers and service families, and students. This will be achieved through working with partners to facilitate the appropriate quantity and quality of housing and ensuring that it provides affordable housing in accordance with Part 2.

12.17 Part 4(e), in line with the requirements of paragraph 62 of the NPPF, establishes support for those who wish to build their own home. The current self-build register indicates there is interest in self-build in the borough, however high local land values and housing targets are resulting in the predominance of flatted developments which limits opportunities for viable self-build. Group self-build has the best potential to deliver significant additional housing output in higher cost areas. We would therefore encourage group self-build as a more viable model of self-build in the borough.

12.18 Part 5 recognises that the borough has a duty to support the development of housing that meets the needs of disabled and vulnerable residents and the Gypsy and Traveller communities. Part 5 (a) considers specialist housing which meets the needs of disabled and vulnerable residents and how such developments should be integrated into the wider area through careful design and the sharing/joint use of facilities thus encouraging a sense of community belonging and social

interaction, where applicable. The Council's Housing with Care Strategy and the London Plan establish the need for those elderly residents with additional support needs.

12.19 Part 5 (b) Gypsy and Traveller accommodation need will be secured through safeguarding the existing Gypsy and Traveller site at Old Willow Close and seeking to deliver additional safeguarded pitches adjacent to the site. Additional support is offered through policy HF5 Gypsy and Traveller accommodation which sets out a framework for further sites to come forward.

12.20 Part 5 (c) acknowledges the need for emergency accommodation which will provide accommodation for the most vulnerable members of our communities such as those who find themselves homeless.

12.21 Part 6 requires development proposals to appropriately respond to the character of the surrounding area and site-specific constraints, as well as provide a high-quality living environment taking account of the relevant London Plan Guidance and London Borough of Tower Hamlets SPDs. Further design guidance is provided in the People Places and Spaces policies.

London Plan policies:

- Policy H1 Increasing housing supply
- Policy H2 Small sites
- Policy H3 Meanwhile use as housing

Local Plan policies:

- HF2 Affordable housing and housing mix
- HF3 Protection of existing housing
- HF4 Supported and specialist housing
- HF5 Gypsy and traveller accommodation
- HF6 Purpose-built student accommodation
- HF7 Large-scale purpose-built shared living
- HF8 Housing with shared facilities (houses in multiple occupation)
- HF9 Housing standards and quality

Evidence base:

- Tower Hamlets Local Housing Need Assessment, 2023
- Strategic Housing Land Availability Assessment, 2017
- London Legacy Development Corporation Local Plan, 2020
- Tower Hamlets Tackling Overcrowding
- Housing Design Standards LPG, 2023
- Housing SPG, 2023
- High Density Living SPD, 2023
- Housing with Care Strategy (LBTH, 2024)

Policy HF2 Affordable housing and housing mix

1. Development proposals will be required to optimise the delivery of affordable homes on-site and contribute to the London Plan and Tower Hamlets strategic target for 50% of all new homes to be affordable.

Residential development proposals must:

- a. provide a financial contribution for affordable homes on sites delivering 2 to 9 new residential;
- b. deliver a minimum of 40% affordable housing (by habitable room) on-site when seeking to provide 10 or more new residential units;
- c. deliver a minimum of 50% affordable housing (by habitable room) on-site through the redevelopment of affordable housing, estate regeneration schemes and industrial land for residential use; and
- d. deliver the required amount of affordable homes in accordance with a 85% social homes and 15% intermediate homes tenure split.

2. Development proposals that do not deliver the required amount of affordable housing, tenure, or unit mix, or proposals that do not accord with other relevant policies of the Local Plan, will be subject to viability testing to derive the maximum viable level of affordable housing.

3. Development proposals for phased residential development must prioritise the early delivery of affordable housing. They must demonstrate how family-sized homes and affordable housing will be provided across all phases and must be considered cumulatively as each phase progresses.

4. Development proposals seeking to deliver off-site affordable homes will not be supported, unless it can be robustly demonstrated that:

- a. there would be a minimum of 50% (by habitable room) affordable housing overall;
- b. a higher proportion of (low-cost) social rented family-sized homes would be delivered;
- c. a higher quality of built environment can be provided both off-site and on-site, through the delivery of public realm, green spaces, play spaces, and community facilities;
- d. there would be no over-concentration of one type of housing, allowing mixed and inclusive communities to be delivered both off-site and on-site with a mix of tenures and unit sizes;
- e. the location of the off-site affordable housing allows the same level of accessibility to local infrastructure and services that would be provided for housing delivered on-site.
- f. the off-site location would not otherwise deliver housing and affordable housing.

5. Development proposals seeking to provide a payment in lieu affordable housing contribution will not be supported unless it can be robustly demonstrated that:

- a. exceptional circumstances apply;
- b. a suitable off-site location cannot be found for the delivery of affordable homes; and
- c. the contribution would secure a higher level of affordable housing provision than the council's 50% strategic target.

6. Affordable housing contributions for amendments to extant permissions will be calculated on the basis of the total number of dwellings of the overall amended development proposal.

7. Affordable housing contributions relating to development proposals for additional housing supported by existing development will be calculated on the basis of the additional component of development.

8. Development proposals are required to deliver a mix of unit sizes in accordance with local housing need, outlined in the table 1:

Table 1: Housing mix

Housing mix	1-bedroom	2-bedroom	3-bedroom	4-bedroom
Affordable housing (rented)	15%	20%	40%	25%

Development proposals for market units should provide a healthy mix of units (at least 15% 3 bed+). Development proposals with an over-reliance on studios and/or one-bedroom units will be resisted. The housing mix in intermediate units should take account of the requirements set out in the London Plan, associated guidance, as well as the LBTH Local Housing Needs Assessment to ensure products will meet an identified need.

9. Schemes that include the demolition of existing affordable housing must:

- a. replace the existing affordable housing with equivalent floorspace and the same housing tenure(s).
- b. seek to achieve an overall uplift in affordable housing by delivering a minimum of 50% affordable homes (by habitable room) in the final development or a minimum of 35% affordable homes (by habitable room) will be delivered within the uplift, whichever is the greater. In either case development proposals will need to meet the council's preferred tenure split within the affordable units.

Supporting text

12.22 Tower Hamlets faces an acute housing need – in particular for low cost rented family housing – a need which is replicated across London. In addition, LBTH faces considerable challenges in delivering homes which are affordable to local people on average incomes, who are unable to access social housing or afford market housing, particularly if they have children³.

12.23 Part 1 sets a strategic target of achieving 50% affordable homes through private development, developments by Registered Providers, the third sector, community led projects, as well as council-led initiatives. This target is considered to best reflect local housing need as evidenced in the Local Housing Need Assessment and the Housing with Care Strategy.

12.24 Part 1(a) sets out that development proposals for between 2 and 9 additional residential units will be required to provide a financial contribution to the development of affordable housing.

12.25 Part 1(b) sets out that on development proposals for 10 or more residential units, at least 40% affordable housing is expected.

12.26 Further details are set out in Appendix 2 Financial Contribution Calculation Methodologies and the borough's Planning Obligations Supplementary Planning Document.

12.27 Part 1(c) expects development proposals on public land or designated industrial land, or delivered as part of the redevelopment of existing affordable housing or an estate regeneration scheme to provide at least 50% affordable housing.

12.28 The affordable housing provision, as per Part 1(d) should be comprised of:

12.29 a. 85% low cost rented element, of which 50% should be affordable rental products and the remaining to be other social rent products as agreed with the council (social rent will also be accepted particularly where this enables schemes to access grant); and

12.30 b. 15% intermediate element, which can include London living rent, shared ownership, and other intermediate products (where supported by the council).

12.31 Affordable rental products are to be inclusive of service charges in order to ensure new homes are genuinely affordable for those on low incomes. In suitable locations a component of affordable housing can be provided as Specialist Housing to meet need identified for those with additional care need in line with the Council's Housing with Care Strategy.

12.32 In addition to the requirements in Part 1, developments are expected to maximise the provision of affordable housing, having regard to availability of public subsidy, implications of long term or phased development (including provision for re-appraising scheme viability at different stages of development) as well as financial viability which should, in particular, take account of prevailing local and regional viability guidance.

12.33 The requirements of Part 1 apply to all types of housing falling into use Class C3, including Build-to-Rent accommodation. Other types of housing, including student housing, large-scale purpose-built

³ These needs have been identified through the Tower Hamlets Local Housing Need Assessment, which sets out the housing requirements arising from expected population growth

shared-living and specialist and supported housing are addressed in the relevant policies in this chapter and will include different affordable housing requirements.

12.34 Levels of affordable housing lower than those set out in Part 1 will only be accepted where robustly justified through viability evidence and where it is demonstrated that there are clear barriers to delivery. Applications that do not meet policy requirements will be subject to viability reviews. Further guidance is provided in the Borough's Development Viability SPD and the Viability and Affordable Housing SPG (GLA, 2017).

12.35 Where the development provides more than the minimum level of affordable housing required in Part 1, the tenure of the additional affordable homes will be subject to negotiation. GLA developed products (including the London Affordable Rent and London Living Rent) may be subject to change over the plan period. Our affordable housing service will provide further guidance on suitable products when assessing applications. Rent levels are determined as part of the viability assessment of each planning application and undertakings are made to retain similar rent levels at the point of completion. The ownership of affordable homes must be transferred to one of our approved local registered providers or other approved affordable housing providers.

12.36 The provision of affordable housing will be calculated using habitable rooms as it ensures the provision of a range of housing sizes more likely to meet the needs identified in the latest housing needs assessment. Any variation on aggregate floorspace across both bedroom mix and tenure should be presented in the accommodation schedule.

12.37 Part 4 expects affordable housing to be delivered on-site. This is important in promoting mixed and inclusive communities. In exceptional circumstances, specific site constraints may require that affordable housing is provided off-site or through payments in lieu. These cases give rise to particular policy requirements to maximise the provision of affordable housing. Payments in lieu towards affordable housing will be secured by planning obligation.

12.38 Part 4(e) requires off-site affordable housing contributions to allow the same level of accessibility to local infrastructure and services as if they were delivered on-site. Development proposals will be required to demonstrate this through submitting a detailed comparison of available infrastructure on-site and with the off-site location and should include as a minimum an assessment of: Public Transport Accessibility Level (PTAL) scores, availability, proximity, and capacity of services such as medical centres, retail, and community facilities.

12.39 Part 5 expects development proposals that include cash in lieu contributions for affordable housing to provide evidence demonstrating that exceptional circumstances in relation to the site or nature of the development would not allow the delivery of the full amount of affordable housing on-site and that all opportunities for off-site development have been investigated and found unfeasible. In order to off-set the harm caused by not delivering affordable housing on-site, development proposals that include a robustly justified cash-in-lieu contribution to affordable housing are expected to provide a payment that amounts to more than 50% affordable housing across the development.

12.40 Part 6 seeks to ensure that affordable housing contributions sought through Minor Material Amendments (MMA) (S73 applications)

reflect the full scale of the overall development, rather than the uplift proposed in the MMA application. In development proposals for the construction of additions or extensions that result in new dwellings being added to existing buildings, an affordable housing contribution will be sought based on the number of new dwellings being proposed.

12.41 Part 7 of the policy reflects the particularly high need for larger, family-sized units in the affordable rental tenure. This is to address an urgent need for larger units to combat the impacts of overcrowding, and may be reviewed later in the plan period. While a unit mix is not prescribed for market and intermediate dwellings, there should be a healthy mix (at least 15% 3 bed+ units), and developments weighted towards studios and one-bedroom units in these tenures will be resisted

12.42 Part 8(a) recognises that, given the high level of need for affordable housing in Tower Hamlets, proposals that include the demolition of affordable housing must ensure that there is no net loss of affordable housing. This should be measured by floorspace rather than by unit numbers or habitable rooms to take account of the fact that older housing estates may contain units that are larger than those required under current planning policies, and to ensure that there is no reduction in real terms.

12.43 Part 8(b) expects proposals for the redevelopment of existing affordable housing to provide either 40% affordable housing on the uplift in habitable rooms, or 50% overall, whichever results in the higher amount of affordable housing by habitable rooms. In both cases, proposals will be expected to meet the council's preferred tenure split as set out in Policy HF2. It should be noted that estate regeneration proposals are not eligible for the London Plan's Fast Track approach to affordable housing and will have to provide viability testing.

London Plan policies:

- H2 Small sites
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H8 Loss of existing housing and estate regeneration
- H12 Supported and specialist housing

Local Plan policies:

- DV1 Areas of growth and opportunity within Tower Hamlets
- DV2 Delivering sustainable growth in Tower Hamlets
- DV5 Developer contributions
- DV6 Social value
- HF1 Meeting Housing Needs

Evidence base:

- Development Viability SPD, 2017
- Viability and Affordable Housing SPG, 2017
- Local Housing Need Assessment (LBTH, 2023)
- Housing with Care Strategy (LBTH, 2024)

Policy HF3 Protection of existing housing

1. Development proposals resulting in the net loss of residential floorspace, self-contained homes, or family-sized homes will not be supported.
2. Development proposals which compromise the supply of self-contained housing will not be supported – in particular family homes.
3. Development proposals which involve the conversion, subdivision, or amalgamation of individual or multiple family homes will only be supported where there is no net loss of family-sized dwellings (3-plus bedroom units). The retained family unit should have access to private external amenity space.

Supporting text

12.44 Policy HF3 seeks to protect existing and safeguard the future supply of self-contained homes across the borough. To meet the housing need of Tower Hamlets over the plan period we must ensure that the supply of self-contained homes and in particular family-sized homes is maintained.

12.45 Part 1 seeks to ensure that there is no net loss of existing residential floorspace through development in the borough. This is to ensure we meet identified local need as well as strategic targets for housing. Family housing requires particular protection, due to high levels of identified need.⁴

12.46 Part 2 seeks to protect existing and safeguard the future supply of self-contained housing. This is to ensure we meet identified local need as well as strategic targets for housing. Development for non-self-

⁴ Local Housing Need Assessment

contained units will not be supported where it utilises land identified for self-contained housing through a current planning permission, or through the borough's development plan. It is recognised that other policies in this plan identify suitable locations for other land uses. Developments of other land uses, where supported by policy and/or site allocations, are not considered to undermine the supply of self-contained units. Family housing requires particular protection, due to high levels of identified need.

12.47 In order to manage the current shortage of family homes (three or more bedrooms), part 3 ensures that proposals to convert family homes into smaller self-contained flats will be resisted, unless the conversion enables the retention of a family unit (3-plus bedrooms). Where possible, the family-sized unit should have access to external amenity space.

London Plan policies:

- H8 Loss of existing housing and estate redevelopment
- Hg Ensuring best use of stock

Local Plan policies

- HF1 Meeting housing needs
- HF4 Supported and specialist housing
- HFg Housing standards and quality

Evidence base:

- Good practice guide to estate regeneration, 2016
- Housing SPG, 2016

Policy HF4 Supported and specialist housing and housing for older people

1. Development proposals for new specialist and supported housing and housing for older people will be supported in principle where it can be demonstrated that it:
 - a. is of high quality, considers the needs of intended occupiers, and meets relevant best practice guidance for this form of accommodation;
 - b. integrates residents into the surrounding community;
 - c. is located in close proximity to public transport, community facilities, local shops and services;
 - d. includes amenity and accommodation facilities for staff where necessary;
 - e. includes provision of affordable units, where appropriate; and
 - f. provides an appropriately detailed and resourced management plan.
2. Where practical, development proposals for new housing for elderly people should deliver small-scale community facilities or town centre uses that allow for interaction between residents and the local community in suitable locations and where supported by council commissioning teams.
3. Existing specialist and supported housing and housing for elderly people will be protected where it is considered suitable for its use and meets relevant standards for this form of accommodation.
4. The redevelopment of any site which includes specialist and supported housing and housing for older people is only considered acceptable where the existing provision is considered to be of low quality, a decanting strategy is provided, and:
 - a. it has been demonstrated that there is no longer an identified need for its retention in the current format;
 - b. the needs met by this form of housing will be re-provided elsewhere within the borough, resulting in no net loss of provision and is both available and affordable; or
 - c. re-provision as part of the development proposal would result in improved standards and quality of accommodation and the accommodation would be re-provided at comparable rent levels.

Supporting text

12.48 This policy aims to ensure that there is a sufficient supply of appropriate housing available for people with specialist care needs, older people, homeless people, disabled people, and vulnerable people to live as independently as possible in accordance with our statutory duties. It also seeks to protect appropriate staff accommodation ancillary to a relevant use.

12.49 The Tower Hamlets Housing Strategy (2016-2021) and the draft Housing and Care Strategy 2024 seek to support the delivery of more choice so that development meets a wide range of housing needs. The London Plan provides an indicative benchmark for specialist housing for older people. The benchmark for Tower Hamlets is 45 units a year. Further need for both supported and specialist housing and housing for older people is set out in the Local Housing Need Assessment 2023.

12.50 Examples of specialist housing include:

- sheltered housing – commonly self-contained homes with limited on-site support (usually within use Class C3);
- residential care homes – commonly bedsit rooms with shared lounges and eating arrangements (within use Class C2);
- nursing homes – similar to residential care, but accommodating ill or frail elderly people, and staffed by qualified nursing staff (also within use Class C2);
- dual-registered care homes – residential care homes where nursing care is provided for those residents who need it (also within use Class C2);
- extra-care homes – combinations of the above providing independent living alongside care and support, and sometimes also offering support for older people in the wider community;

- homeless shelters and transitional housing for those experiencing homelessness (sui generis use, C2 use or C3 use depending on the nature of the facility); and
- staff accommodation ancillary to a relevant use.

12.51 In order for development proposals to be considered high-quality in accordance with Part 1(a) they must provide a high-quality living environment both internally and externally. Internal proposals should include components such as, but not limited to, suitably sized kitchens, bathrooms, laundry facilities, lounges, and external amenity spaces. Developments must also consider the needs of the intended occupiers. Advice on how to suitably consider occupiers with additional support needs can be sought from the council's housing and adult health service teams.

12.52 In accordance with Part 1(b), opportunities to integrate the development into the wider area should also be explored to encourage a sense of belonging (especially among people from different generations) as well as to protect against the health impacts of loneliness and isolation. This expectation should inform the layout of the development and the design of associated public realm.

12.53 In accordance with Part 1(c), development proposals must demonstrate that they are accessible in terms of location and individual mobility needs. Close proximity to local services is considered to be a walkable distance of no more than 10 to 15 minutes. Where appropriate, the proposed scheme should provide necessary storage for mobility scooters and wheelchairs, where relevant, and provide pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances. The particular locational needs of facilities will vary according to the intended residents and their levels of mobility. Where mobility is limited, development proposals



should be located within 5 minutes walking distance of local shops, services, community facilities, and public transport to ensure that residents can continue to participate in their local community.

12.54 Part 1 (d) sets out the need for staff facilities at specialist housing developments. Such developments may require 24-hour care and therefore staff being present on site for extended periods of time. Facilities such as break spaces, changing rooms, showers, toilets and even rest spaces for overnight should be considered.

12.55 Part 1(e) requires that development proposals include provision of affordable housing. This requirement will vary based on the nature of the proposal. All development proposals for C3 housing will be required to provide affordable housing in accordance with Policy HF2. While non-C3 housing should also provide affordable accommodation, it is recognised that, due to the particular costs or nature of a facility, it may not be possible to provide the amount of affordable housing required by Policy HF2. In these cases, development proposals should demonstrate that they are providing the maximum viable amount of affordable housing. It should be noted that specialist older persons housing is eligible for the London Plan's Fast Track Route for the provision of affordable housing; other types of specialist housing are excluded from the fast-track approach and typically take bespoke approaches to the provision of affordable housing.

12.56 Part 1(f) requires that development proposals for specialist or supported accommodation provide a management plan. If the proposed facility is new and not yet operational, the applicant should set out which local authorities or charities the provider will be working with and seek agreement with the council as to the percentage of occupiers that will be existing Tower Hamlets residents. Management plans should demonstrate the residential population mix and other management practices that minimise safeguarding risks, maximise opportunities to create and sustain social networks and access appropriate support, and ensure that the development minimises amenity impacts. Management plans should also include details of numbers of staff on site and staff routines, how residents will be placed within the accommodation, the level of care provided, how resident independence would be sustained, expected comings and goings, safeguarding practices, health and

safety procedures and the maintenance of the accommodation and any communal spaces provided.

12.57 Part 2 seeks to incorporate, where practical, small-scale community and town centre uses within the development proposal. Such components can improve the health and well-being of residents as they offer opportunity to play and active role in their community through continued interaction and stimulation with the surrounding existing and wider community.

12.58 Part 3 sets out that existing accommodation will be protected where it is considered suitable and meeting the needs and standards required.

12.59 Part 4 provides criteria for the assessment of development proposals that include the redevelopment of specialist housing. In order to comply with these criteria, development proposals will need to demonstrate that they have consulted with council commissioning teams and external providers to demonstrate that (a) there is no longer an identified need for the existing facility in its current format, taking account of impacts that consented developments may have on the supply of this type of facility; (b) the needs met by this form of housing will be re-provided elsewhere in the borough, resulting in no net loss of provision and that the proposed space is both available and affordable – in this case, an existing facility should be identified that is able to accommodate the existing need without placing any additional pressure on the facility or compromising the ability of the borough to meet future needs for this type of facility; or (c) the facility will be re-provided as part of the development proposal with improved standard of accommodation and at comparable rent levels to the existing facility – in this case, development proposals will need to submit a decanting

plan to show how disruption to existing residents will be minimised and prioritising a single permanent move over a move to a temporary facility and a move to the re-provided facility.

12.60 All proposals for specialist and supported housing and housing for older people will be referred to our adult health service to consider the approach to safeguarding, and ensure that a good quality service can be provided to vulnerable people.

London Plan policies:

- H12 Supported and specialised accommodation
- H13 Specialist and older persons housing

Local Plan policies:

- DV5 Developer contributions
- H2 Affordable housing and housing mix
- PS4 Attractive streets, spaces and public realm
- PS5 Gender inclusive design

Evidence base:

- Tower Hamlets Local Housing Need Assessment, 2023
- Tower Hamlets Local Housing Strategy
- Tower Hamlets Housing and Care Strategy

Policy HF5 Gypsy and Traveller accommodation

1. Accommodation for the Gypsy and Traveller community will be secured through safeguarding the existing Gypsy and Traveller site at Old Willow Close, seeking to deliver additional safeguarded pitches adjacent to the site and development proposals at suitable locations.
2. Development proposals for Gypsy and Traveller accommodation will be supported in principle, where it can be demonstrated that:
 - a. the proposed site is suitable for housing and in an accessible, safe location;
 - b. the proposal employs high-quality design and is sympathetic to local character and heritage;
 - c. the proposal maintains and enhances the quality of the environment and residential amenity; and
 - d. the site is not located in an area of high flood risk (flood zone 3).

Supporting text

12.61 This policy safeguards the existing Gypsy and Traveller site at Old Willow Close and securing any new pitches that arise as a result of the completion of the Elizabeth line at Old Willow Close. Should there be need for additional accommodation identified through the Greater London Authority Gypsy and Traveller Accommodation Need Assessment, development proposals which meet this need will be considered against the criteria set out above and in line with government guidance.

12.62 This policy aims to ensure that new Gypsy and Traveller sites are well integrated into their surroundings and respect the interests of existing settled communities. Any new provision should be prioritised for permanent facilities, rather than transit sites, due to the local Gypsy and Traveller need.

London Plan policies:

- D13 Agent of change
- H14 Gypsy and Traveller accommodation

Local Plan policies:

- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- CG6 Managing flood risk

Evidence base:

- Tower Hamlets Gypsy and Traveller Accommodation Assessment 2016

Policy HF6 Purpose-built student accommodation

1. Development proposals for purpose-built student accommodation (PBSA) will be supported only where it can be demonstrated that:

- a. the proposal would not compromise the supply of Class C3 self-contained homes;
- b. the site is located within a site allocation for PBSA (refer to policies map), is within the CAZ or the Borough's Metropolitan and District Town Centres and in a location with a PTAL of 4 to 6, or within short walking distance of a further or higher education institution;

the proposal would not result in an overconcentration of similar uses within the area, liable to give rise to residential amenity issues to neighbours, and not be detrimental to the mix and cohesiveness of communities and uses in the area;

- d. there is an agreement with one or more of London's Higher Education Institutions; and
- e. the proposal would not place significant pressure on local infrastructure.

2. Development proposals for PBSA are required to:

- a. deliver a minimum of 50% affordable C3 homes on-site, or
- b. where the location is not suitable for C3 affordable housing, deliver a minimum of 50% of units as affordable student accommodation on-site;

3. Development proposals for PBSA are required to:

- a. provide 10% of student rooms which are wheelchair accessible and adaptable, including access to a wheelchair-accessible shower room for independent use (as per London Plan 2021);
- b. provide an appropriate layout of living space, communal amenity space including well located and useable outdoor communal amenity space and internal communal facilities for each student in line with emerging guidance;
- c. secure the majority of the bedrooms in the development, including any affordable student accommodation bedrooms, through a nomination agreement for occupation by students at one or more higher education providers and make best endeavours to secure the remainder of the bedrooms through a nomination agreement for occupation by students at one or more higher education providers; and
- d. give priority of accommodation to local students leaving care, experiencing homelessness, or otherwise in need of alternative accommodation within the borough.

4. Temporary use of PBSA during holidays during the academic year for students attending non-term time courses will normally be supported, provided students without alternative holiday time accommodation are not displaced.

5. Development that proposes the net loss of existing PBSA will only be supported where:

- a. it can be demonstrated that the accommodation is no longer needed because the needs of students can be better met elsewhere, or
- b. adequate replacement housing will be provided which meets the criteria in Part 1 to 4 above.

Supporting text

12.63 In the context of this policy, student housing relates to student accommodation with an undertaking with an institution and accommodation provided by an institution.

12.64 This policy recognises that the delivery of a significant amount of student housing compromises the ability to deliver other priorities, in particular affordable housing, but also employment and infrastructure provision. As such, the delivery of student accommodation needs to be managed in accordance with strategic needs and local priorities, ensuring that the positive impacts it can bring to the local economy and the borough's higher education sector is combined with the delivery of the affordable homes and infrastructure the residents of LBTH need.

12.65 In accordance with part 1(a) of the policy, development proposals for student accommodation will not be supported where they compromise the supply of self-contained homes. In this case, the supply of self-contained homes is defined as: existing housing (use Class C3 and other types of housing, including specialist accommodation), sites with planning permission for housing (use Class C3) and sites allocated in this plan or other development plan documents for the development of housing.

12.66 Part 1(b) of the policy directs student accommodation to the most appropriate locations where the introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport. Close proximity is defined as adjacent to the institution or within walkable distance of 10 to 15 minutes.

12.67 Part 1(c) of the policy acknowledges that student accommodation and large scale purpose-built shared-living developments can have an



impact on the amenity of neighbouring occupiers, particularly in relation to noise and anti-social behaviour. Parts of the borough already have concentrations of PBSA and applications will be required to demonstrate the number of existing and the pipeline of future PBSA developments within a 400m radius, from the site boundary, of the site. Development proposals for student accommodation will need to demonstrate how these matters have been addressed through the layout and design of the development and how they will be addressed through the management of the facility.

12.68 Part 1 (d) requires a development proposal to demonstrate that there is a link between one or more of London's Higher Educational Institutions. This is to ensure that the accommodation provided will serve the need of students seeking education at providers within London. Proposals should also demonstrate that the bedrooms in the Purpose-built student accommodation development are needed by London's HEIs in that particular location, and that its design, layout, and rental levels meet the needs of London's higher education students. Higher Education Institutes should be involved in the early design process of the Purpose-built student accommodation.

12.69 To comply with part 1(e), development proposals for student accommodation will need to carry out an assessment of the provision of relevant infrastructure serving the development, including public transport, electricity, and water to ensure that the proposed development would not place significant additional pressure.

12.70 Part 2(a-b) supports the delivery of affordable student housing in accordance with the London Plan. Part 2(a) recognises the high level of need for traditional affordable housing in the borough and that student housing developments may occupy land that could otherwise be used for the delivery of traditional housing. If the development proposal includes the provision of affordable C3 housing, we will apply the requirements of Policy HF2 in terms of tenure mix and unit size mix. In accordance with the London Plan, development proposals for student housing are assessed on the basis that 2.5 student bedrooms are equivalent to 1 standard C3 dwelling. On that basis, development proposals that include 25 or more student bedrooms are considered major development and will be expected to provide affordable housing on-site. Development proposals that include fewer than 25 student

bedrooms will need to provide a cash-in-lieu contribution in accordance with the small sites affordable housing requirements set out in Policy HF2.

12.71 Part 2(b) acknowledges that there may be some sites that are proposed for purpose built student accommodation where traditional housing would not be appropriate. In those cases, the council will expect the provision of at least 50% of the rooms as affordable student accommodation. Development proposals should demonstrate that the delivery of on-site affordable C3 housing would not be appropriate and feasible. The cost should be no more than 55% of average student income for a UK full-time student living in London away from home. Planning obligations will be used to secure the affordability and availability of the affordable accommodation for as long as the student housing use continues.

12.72 Part 3(a) to (b) sets out the requirements for new student accommodation to ensure that it is of the highest quality and meets the needs of all students who would use the accommodation while locating such accommodation in areas which have the facilities and sustainable transport connections to support residents. In order to meet the needs of students with physical disabilities, 10% of student rooms must be wheelchair accessible (capable of being independently accessed and used). To meet this requirement, rooms and bathrooms must meet the requirements outlined in Figure 30 and Figure 52 in the British Standard BS8300: Design of an accessible and inclusive built environment. Wheelchair-accessible rooms should be located in level 5 or below. The GLA intend to publish London Plan Guidance (LPG) on PBSA proposals will be expected to comply with this LPG.

12.73 In order to demonstrate that there is a need for the proposed student accommodation, Part 3(c) requires student accommodation to either be operated directly by a higher education institution or have an agreement in place from initial occupation with one or more higher education providers to provide housing for its students. This agreement is known as a nomination agreement and must cover the development as long as it is used for student accommodation. A nomination agreement with one or more higher education providers must cover at least 50% of the bedrooms within the development, and all of the affordable student bedrooms. For the remainder of the student bedrooms, development proposals must demonstrate that best endeavours have been taken to secure nomination agreements with higher education institutions, including demonstrating that, in the first instance, all local higher education institutions have been approached and, in the second instance, that all higher education institutions based in London and the immediate vicinity have been approached. The nomination agreement will be secured through a S106 agreement.

12.74 The London Borough of Tower's Hamlets classes those who have left the care system as a protected characteristic. In order to comply with part 2(d), development proposals should demonstrate that they have engaged with the council's youth services to identify local students in need of alternative accommodation within the borough in order to attend college or university.

12.75 Part 4 seeks to support PBSA utilization as accommodation during non-term time holidays when it would normally be largely left under occupied. The PBSA could be used to provide accommodation for other students attending non-term time courses, seminars, or entry examinations. The accommodation should not be used for non-educational purposes. Some students may not have alternative holiday

time accommodation, including recent care-leavers and others. These students should not be displaced.

12.76 Part 5 relates to proposals involving the net loss of student accommodation. The loss of student accommodation should not create additional pressure on the existing housing stock and the supply of new housing, and thus it will only be supported where it can be demonstrated that it no longer serves a purpose or can be provided elsewhere.

London Plan policies:

- H4 Delivering affordable housing
- H15 Purpose-built student accommodation

Local Plan policies:

- HF2 Affordable housing and housing mix
- HF3 Protection of existing housing
- DV5 Developer contributions
- PS4 Attractive streets, spaces and public realm

Evidence base:

- Housing SPG (2016)
- Housing Design Standards LPG (2023)
- Local Housing Need Assessment (2023)
- British Standard BS8300: Design of an accessible and inclusive built environment
- High Density Living SPD, 2020

Policy HF7 Large-scale purpose-built shared-living

1. Development proposals for large-scale purpose-built shared-living (LSPBSL) will only be supported where it can be demonstrated that:
 - a. the proposal meets the definition of LSPBSL as set out in the London Plan policy H16;
 - b. it would not compromise the supply of Class C3 self-contained homes;
 - c. it forms part of a mixed-use development that provides ground floor spaces that serve the community, either with community uses or town centre uses where relevant at the ground floor and well-activated public realm spaces;
 - d. it is located within the CAZ or the Borough's Metropolitan and District Town Centres; and
 - e. it would not result in an overconcentration of similar uses, would not be detrimental to neighbouring residential amenity and would not be detrimental to the mix and cohesiveness of communities and uses in the area.
2. Development proposals for LSPBSL are required to:
 - a. deliver a minimum of 50% affordable C3 homes on-site; or
 - b. provide a financial contribution secured by planning obligation equivalent to 50% C3 affordable housing at the borough's required tenure and size mix.

3. Development proposals for LSPBSL are required to:
 - a. provide 10% of homes which are wheelchair accessible and adaptable, including access to a wheelchair-accessible shower room for independent use;
 - b. comply with relevant design guidance and standards and satisfy the most up to date housing space standards as the time of assessment;
 - c. provide communal space that meets the minimum requirements for houses in multiple occupation;
 - d. provide an appropriately detailed and resourced management plan to mitigate potential harm to residential amenity; and
 - e. be under single management

Supporting text

12.77 Large-scale purpose-built shared living (LSPBSL) is defined as non-self-contained market housing developments that include at least 50 units. This type of housing can provide accommodation to single person households who cannot or choose not to live in traditional self-contained housing or HMOs. London Plan Policy H16 provides additional policy requirements and guidance for the development of LSPBSL.

12.78 LSPBSL can play a role in meeting a component of the need for new homes in the borough. Development proposals should be situated in locations which are close to existing services, facilities and public transport.

12.79 In accordance with part 1(b) of the policy, development proposals for LSPBSL will not be supported where they compromise the supply of self-contained homes. In this case, the supply of self-contained homes is defined as: existing housing (use Class C3 and other types of housing, including specialist accommodation), sites with planning permission for housing (use Class C3) and sites allocated in this plan or other development plan documents for the development of housing.

12.80 Part 1(c) sets out that LSPBSL should be genuinely mixed-use developments which offer more uses than merely residential and therefore optimises land use given the preferred locations as set out in Part 1 (d).

12.81 In line with London Plan Policy H16 Part 1 (d) spatially directs LSPBSL developments to the CAZ and the borough's metropolitan and district town centres which would offer the readily available services to serve LSPBSL. These are areas which also offer access to public transport with high PTAL scores.

12.82 Part 1 (e) given the high density nature of LSPBSL, they can have particular impacts on their surrounding communities in terms of noise, privacy, and stress on existing infrastructure. To ensure that LSPBSL does not have a negative impact on the amenity of an existing community, development proposals will be required to provide an assessment of the potential impacts of the proposal, and the cumulative impacts of the proposal alongside other consented development in the surrounding area, on neighbouring amenity, and any measures necessary to mitigate these impacts.

12.83 The Council will monitor the pipeline of existing and consented LSPBSL schemes to determine their concentration across the borough and identify areas which could be subject to an overconcentration impacting upon balanced and mixed communities.

12.84 Additionally, information setting out existing and planned infrastructure within the vicinity of the development proposal will help inform understanding of how part 1 (e) has been addressed.

12.85 Parts 2 (a) and (b) In accordance with the London Plan, development proposals for LSPBSL are assessed on the basis that 1.8 bedrooms are equivalent to 1 standard C3 dwelling. On that basis, as required by Part 2(a)-(b), development proposals that include 18 or more bedrooms are considered major development and will be expected to provide affordable housing on-site or a cash-in-lieu contribution equivalent to the delivery of 50% affordable housing. Development proposals that include fewer than 18 bedrooms will need to provide a cash-in-lieu contribution in accordance with the small sites affordable housing requirements set out in Policy HF2.

12.86 In order to meet the significant need in the borough for affordable housing, part 2 of this policy requires development proposals for

LSPBSL to either provide a cash-in-lieu contribution to the provision of affordable housing elsewhere in the borough equivalent to the delivery of 50% affordable housing at the unit size and tenure mix set out in Policy HF2, or deliver 50% affordable housing on-site at the unit size and tenure mix set out in Policy HF2. Where the affordable housing is delivered on-site, this must be in the form of self-contained C3 housing and the development proposal should ensure that the service charges are affordable for the residents, meaning that they may need to restrict access to some shared amenities within the LSPBSL element. The affordable housing will need to meet the housing standards set out in Policy HFg.

12.87 In accordance with part 3(a), development proposals must provide a maximum of 10% of dwellings as wheelchair accessible units. Given the nature of LSPBSL developments, the communal amenities must also be designed to be wheelchair accessible, including kitchens, laundry rooms, lounges, and external amenity space.

12.88 To meet the requirements of parts 3 (c) and (b), development proposals should have regard to Policy HFg.

12.89 Communal amenity space should be generously sized and high quality and should be located within the site in such a way that it minimises exposure to noise and air pollution. A portion of the amenity space should be provided at ground level to ensure there is space useable by those who may not be comfortable using a rooftop space.

12.90 Part 3(d) requires development proposals for LSPBSL to provide a management plan, that plan should address the following:

- be under single management, with a minimum tenancy length of three months;
- management practices that minimise safeguarding risks;
- opportunities for residents to create and sustain social networks;
- measures that will minimise the accommodation's amenity impacts;
- security and fire safety procedures;
- maintenance of the internal and external areas of the building, including communal spaces and private rooms;
- how services for the residents will operate, for example the concierge service, gyms, room cleaning, or linen changing services, and their timings and access arrangements;
- the management of deliveries for servicing the development and residents; and
- arrangements for moving in and out of the accommodation.

12.91 Management plans will be secured via planning condition or a Section 106 agreement.

12.92 The GLA has produced London Plan Guidance regarding LSPBSL. Development proposals must have regard to this guidance.

12.93 Part 3 (e) requires that LSPBSL schemes be under single management and that such management companies will be responsible for ensuring compliance with any agreed management plan.

London Plan policies:

- H4 Delivering affordable housing
- H16 Large-scale purpose built shared living

Local Plan policies:

- DV5 Developer contributions
- PS4 Attractive streets, spaces and public realm

Evidence base:

- Large-scale purpose built shared living LPG, 2024
- Housing Design Standards LPG, 2023
- British Standard BS8300: Design of an accessible and inclusive built environment
- High Density Living SPD, 2020

**Policy HF8 Housing with shared facilities
(houses in multiple occupation)**

1. Development proposals for housing with shared facilities (Houses in Multiple Occupation (HMO)) will be supported where it can be demonstrated that:
 - a. it will not result in the loss of existing larger housing suitable for family occupation;
 - b. it will provide a cash-in-lieu contribution to the delivery of affordable housing in accordance with policy HF2;
 - c. they are located in an area of high transport accessibility; and
 - d. they comply with relevant standards and satisfy the housing space standards outlined in Policies HF9.
2. Developments for HMOs should include an appropriately detailed and resourced management plan.
3. The loss or self-containment of good quality homes for multiple occupation will be resisted unless:
 - a. it can be demonstrated that the accommodation is incapable of meeting the relevant standards for houses in multiple occupation; or
 - b. adequate replacement housing with shared facilities will be provided that satisfies criteria 1(a) to (d) above.

Supporting text

12.94 Houses in multiple occupation (HMOs) refer to residential properties that take the form of shared houses, flats, and non-self-contained dwellings. Planning permission is required for an HMO where there are more than six unrelated individuals forming a household who share a kitchen, bathroom, or toilet. This definition is different to that used by the mandatory licencing scheme. HMOs have traditionally provided lower cost housing, including for those under 35 years of age in receipt of the shared room rate housing benefit.

12.95 Applications should seek to address housing need, as outlined in Policies HF1 and HF2. It is considered this is best delivered through a mixed tenure scheme which could meet a range of housing needs. In addition, reflecting the changing role of HMO-style accommodation in the borough and the acute shortage of affordable housing, it is appropriate that all forms of market housing (including HMOs) contribute towards meeting the high affordable housing need.

12.96 Part 1(a) to (d) ensures development proposals contribute towards maintaining mixed and inclusive communities. Affordable housing contributions will be sought from all residential developments (as per the GLA's Housing Supplementary Planning Guidance and Tower Hamlet's SDP on development obligations).

12.97 Part 1 (b) sets out the requirements to provide affordable housing for this type of development. In accordance with the London Plan, development proposals for HMOs are assessed on the basis that 1.8 non-self-contained communal accommodation bedrooms is equivalent to 1 standard C3 dwelling. On that basis, development proposals that include 18 or more bedrooms are considered LSPBSL and covered by Policy HF8. Development proposals that include fewer than 18 non-self-

contained communal accommodation bedrooms will need to provide a cash-in-lieu contribution in accordance with the small sites affordable housing requirements set out in Policy HF2.

12.98 HMO developments must provide high-quality living space, in line with relevant standards as outlined in HF9 and PS3. Applicants should also ensure that HMOs satisfy the appropriate environmental health and fire safety standards. Part 2 sets the requirement for the inclusion of a management plan which should contain:

- management practices that minimise safeguarding risks;
- opportunities for residents to create and sustain social networks;
- measures that will minimise the accommodation's amenity impacts; and
- security and fire safety procedures.

12.99 Part 3 of the policy seeks to protect existing HMOs where they are of a suitable standard.

London Plan policies:

- H9 Ensuring the best use of stock

Local Plan policies:

- HF2 Affordable housing and housing mix
- HF3 Protection of existing housing
- PS3 Securing design quality

Evidence base:

- LBTH LHNA 2023

Policy HFg Housing standards and quality

1. All residential development is required to demonstrate that, as a minimum, it meets with the most up-to-date London Plan space and accessibility standards, in particular:
 - a. it provides a minimum of 2.5 metres floor-to-ceiling heights, and
 - b. at least 10% of dwellings are built to the 'wheelchair user dwellings' accessible housing standard M4 (3) and the remainder of dwellings are built to the 'accessible and adaptable dwellings' accessible housing standard M4 (2) both contained within part M (volume 1) of the building regulations:
 - i. Where units which meet the wheelchair user dwellings standards M4 (3) (2) (b) are to be delivered above the ground floor, access to a second lift must be provided.
 - ii. In exceptional circumstances, where units which meet the wheelchair user dwellings standards M4 (3) (2) (b) cannot be accommodated on site, contributions in-lieu will be considered.
 - c. To ensure wider accessibility development proposals must include powered and fully automated:
 - i. Communal gates
 - ii. Communal doors and first fire doors
 - iii. Doors to waste storage rooms
2. Development proposals for affordable housing should demonstrate that:
 - a. they are not externally distinguishable in quality from private housing; and
 - b. low cost rented family units should include a mix of units which offer homes with open plan living spaces and separate kitchen and living rooms.
 - c. should have well-appointed and adequately sized entrance lobby areas
3. Residential development proposals are expected to maximise the proportion of dual aspect units. Where single aspect units are proposed, justification should be provided demonstrating that no alternative design was feasible that would have reduced or eliminated single aspect units. Developments should also incorporate external shading to adapt to a warming climate.
4. Developments must use hard wearing, durable materials for the affordable housing elements of the development.
5. Development is required to protect or re-provide existing amenity space (private, communal, and child play space). Net loss of existing amenity space will be resisted.
6. Development will need to demonstrate how it will meet the following minimum amenity space (private, communal, and child play space) standards on site:
 - a. a minimum of 5 square metres of private outdoor space should be provided for each 1-2 person dwellings and an extra 1 square metre should be provided for each planned additional occupant in each larger dwelling;
 - b. balconies and other private external spaces should have a minimum width and depth of 1500 mm;

- c. for developments with 10 or more residential units, the minimum communal amenity space (excluding circulation areas, access routes and waste or bike storage) should be 50 square metres for the first 10 units plus a further one square metre for every additional unit thereafter;
- d. major developments should provide a minimum of 10 square metres of high-quality play space for each child and young person;
- e. Communal amenity space should:
 - i. receive sunlight;
 - ii. be adequately screened from parking areas;
 - iii. be located so as to minimise exposure to air and noise pollution;
 - iv. be inclusive for all users;
 - v. be overlooked by habitable rooms to ensure safety and surveillance;
 - vi. incorporate sustainable landscaping principles and practices;
 - vii. be accessible to all residents of the development, irrespective of tenure; and
 - viii. support an appropriate balance between informal social activity and play.
- f. Development proposals should locate play spaces at ground floor level or demonstrate why this is not practical. Development proposals that include child play space on rooftop spaces or internal floorspace should have direct access to outdoor amenity space and allow oversight of children outside from family sized homes.

Supporting text

12.100 Delivering the homes the borough needs will result in further optimisation of land use and therefore require an appropriately quality-driven response to maintain and improve standards of living in the borough. High density developments necessitate that development delivers higher than the minimum design, space, and amenity standards. The High Density Living SPD provides additional guidance regarding standards of accommodation for development proposals.

12.101 Part 1(a) and (b) seeks to ensure all housing development provides adequate internal space to meet relevant space, accessibility and amenity standards and provide an appropriate living environment. It requires development to comply, as a minimum, with the space and accessibility standards set out in the London Plan (GLA, 2021), the Housing Design Standards London Plan Guidance (GLA, 2023) and the Housing Supplementary Planning Guidance 2016), whilst having regard to the particular needs of residents in the borough as well as the increasingly dense character of the built form. If the GLA's space and accessibility standards are updated, the council may seek to implement these changes, so long as they are locally suitable. The council strongly urges developers/applicants to provide evidence of how the scheme will achieve high-quality design.

12.102 In order to implement Part 1(b) and meet standards in the Housing Supplementary Planning Guidance (2016), 10% of all new units across all tenures should be wheelchair user dwellings, but this may be varied to at least 10% of habitable rooms where a better outcome is provided in terms of delivery of larger units. All 'wheelchair user dwellings' (the M4 (3) standard) in the affordable rented tenure should meet the M4 (3) (2) (b) standard which meets the needs of occupants who use wheelchairs.



12.103 It is expected that units which meet the wheelchair user dwellings standards M4 (3) (2) (b) above the ground floor will be provided with access to a second lift for use when the primary lift is not functioning. The council has a preference that units which meet the accessible units standards M4 (3) will be provided below the fifth floor due to difficulties allocating wheelchair accessible units on higher floors. In some circumstances, site constraints (such as the inability to secure sufficient accessible parking, lack of lift circulation space, and restrictions on ground floor residential uses) could lead to applicants arguing that units which meet the wheelchair user dwellings standards M4 (3) (2) (b) may not be able to be delivered on site. In these

circumstances, we may accept payments in lieu of the provision of units which meet the wheelchair user dwellings standards M4 (3) (2) (b) through the 'Project-120' scheme. The payment in lieu will cover the typical installation costs of retrofitting an existing dwelling and will be secured by planning obligation.

12.104 Part 1 (c) ensures wider accessibility of development proposals, greater ease of use and safety for all residents.

12.105 Part 2 provides guidance that private and affordable housing should not be distinguishable. Different tenures should be mixed throughout a development, although it is recognised that separate cores may be required to enable effective management and minimise service charges for affordable units. Where separate cores result in separate entrances for market and affordable units, these entrances must also not be externally distinguishable and must be located so that they are of equivalent access and amenity value. The internal layout, floor levels and quality of affordable housing entrances must be of a high quality and sufficient area and thoughtfully designed to accommodate access and ease of movement of residents using, wheelchairs, mobility scooters or push chairs. Entrances and lobbies must also be well-appointed and adequately sized to ensure inclusive accessibility for those with mobility impairments or entering with small children in pushchairs, having regards to the guidance in the High Density Living SPD.

12.106 Part 2 (c) sets out that low cost rented family homes should generally be designed to include a mix of homes which offer open plan living spaces and also separate kitchen and living room which offers choice to meet the preferences of those living in the borough and in housing need.

12.107 Part 3 recognises the benefits of dual aspect dwellings to the

well-being of residents and the ability of housing to adapt to the impacts of climate change without the need for mechanical cooling. In order to justify the inclusion of single-aspect dwellings, development proposals will need to demonstrate that no alternative design or layout that includes a greater proportion of dual-aspect dwellings is feasible. In line with the policies in the Clean and Green Future chapter development must mitigate and adapt to climate change. Developments should incorporate overhangs, eaves, recesses, louvres or shutters to aid temperate control of internal spaces.

12.108 Part 4 recognises that due to higher occupancy rates and child yields, affordable housing is likely to be subject to more wear and tear than other housing tenures. In order for these homes to be fully fit for purpose, developers must use hard-wearing, durable materials to ensure the development remains of high quality throughout its lifetime and requires minimal service charges to clean and maintain. This should be evidenced in the design and access statement. In addition, all family-sized affordable homes should have separate kitchens and living rooms, due to local needs. For further guidance, please contact our affordable housing service and/or refer to the Tower Hamlets Housing Forum's Section 106 Design Guide.

12.109 Part 5 aims to ensure that all existing amenity space is protected. Where it would result in an improvement in quantity and/or quality of open space, re-provision will be allowed.

12.110 Part 6 seeks the provision of new outdoor amenity space on-site which is 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.

12.111



12.112 In considering the design and layout of private amenity space, it is important that the space meets the minimum standards set out in the policy (see part 5) to ensure that residents have sufficient space to carry out activities such as drying clothes or eating a meal outside.

12.113 Due to the positive impacts of access to nature in terms of well-being, a significant amount of amenity space should include soft landscaping. This also provides greater opportunity to incorporate biodiversity elements and sustainable drainage systems (SuDS). In considering the design and layout of communal space, it is important that this space is integrated into the overall design of the development and the wider public realm. The design should ensure that communal

space is overlooked and supports a range of activities including space for relaxation, gardening, urban agriculture, and opportunities to promote biodiversity, ecology, and intergenerational community cohesion.

12.114 In considering the design and layout of child play space, it is important to ensure that this responds to the needs of children within the development. This space should be well-integrated into the development and fully considered in the design of the communal space. However, play provision requirements must be provided in addition to other quantitative standards, such as open space provision and communal space provision. In order to demonstrate that the proposed play space is of high quality, applicants will be required to demonstrate how they have used Play England's 10 key design principles for creating successful play spaces. Development proposals that do not include on-site play space will not generally be supported. In exceptional circumstances, where a development proposal can demonstrate that all opportunities to provide the required play space on-site have been exhausted, the council may seek a cash-in-lieu contribution to support expansions or enhancements to existing play spaces. This will be secured by as a planning obligation.

12.115 Part 6(e) sets out standards for the development of communal amenity space, including child play space. More guidance regarding the design of communal amenity space can be found in the High Density Living SPD. In regeneration schemes it is recommended that input is sought from existing residents on the design of communal amenity spaces.

12.116 Part 6(f) recognises that ground floor space is preferable for the provision of child play space and that some residents and parents may be anxious using a rooftop space. In the first instance development

proposals should seek to deliver child play space at ground floor level and where this is not possible robustly demonstrate why it is not achievable. Where ground floor child play space cannot be delivered it must adjoin direct accessed amenity space which is overlooked by family homes to foster a sense of security.

London Plan policies:

- D6 Housing quality and standards
- D7 Accessible housing
- S4 Play and informal recreation

Local Plan policies:

- DV3 Health impact assessments
- PS3 Securing design quality
- PS4 Attractive streets, spaces and public realm
- CG7 Sustainable drainage
- CG9 Air quality
- CG10 Noise and vibration
- BO6 Plan and recreation spaces

Evidence base:

- High Density Living SPD, 2020
- Nationally Described Space Standards, 2015
- Tower Hamlets Child Yield Calculator, 2017

13. Clean and green future



- CG1 – Mitigating and adapting to a changing climate
- CG2 – Low energy buildings
- CG3 – Low carbon energy and heating
- CG4 – Embodied carbon, retrofit and the circular economy
- CG5 – Overheating
- CG6 – Managing flood risk
- CG7 – Sustainable drainage
- CG8 – Water efficient design
- CG9 – Air quality
- CG10 – Noise and vibration
- CG11 – Contaminated land

Introduction

13.1 Addressing the climate emergency is both a global and local issue, where the challenge to mitigate against the impacts of a changing climate begins in our homes, streets, and buildings. The Tower Hamlets Council Strategic Plan 2022-2025 sets out the council's ambition to address the climate crisis by ensuring that the borough ranks among the cleanest, greenest, and most energy efficient local authorities, not just in London, but the whole of the UK.⁵

13.2 In March 2019, Tower Hamlets became one of the first councils in the country to declare a climate emergency and adopt a Net Zero Carbon Plan for the Borough. This plan sets out commitments to reduce carbon emissions under the council's direct control (such as from council-owned and operated buildings and vehicles) to net zero by 2025. In 2021, the council joined the UK 100 Net Zero Pledge to become a Net Zero Borough by 2045 or sooner,⁶ five years ahead of national targets.⁷

13.3 There is a growing body of evidence that the built environment is a major contributor to greenhouse gas emissions. The Tower Hamlets Net Zero Carbon Partnership Action Plan (2021) estimates that buildings made up approximately 31% of the borough's emissions in 2016, and that the overall level of emissions from this sector would barely decrease at all by 2050 under a 'business as usual' scenario. In addition, Tower Hamlets currently produces the fourth highest levels of total carbon emissions out of all London boroughs.⁸ It is evident that significant changes must be made to achieve the council's net zero carbon commitments.

⁵ A Cleaner and Greener Future for Tower Hamlets (2023)

⁶ Tower Hamlets Net Zero Carbon Partnership Action Plan (2021)

⁷ The Climate Change Act 2008 (2050 Target Amendment) Order 2019

⁸ London Energy and Greenhouse Gas Inventory (LEGGI) (2020)



13.4 However, it is no longer adequate to focus on carbon emission reduction as the sole means of addressing the climate emergency. London is already experiencing the effects of a changing climate, from warmer winters to hotter summers, with increased risk of extreme weather events such as heatwaves and flooding. Many local residents and businesses have already experienced dramatic increases in energy costs, with families struggling to afford to heat their homes over the winter. Indeed, all measures taken to address the impacts of climate change are tantamount to protecting and improving people's

health, well-being, and quality of life. Climate change also impacts the resilience of natural habitats, and can harm the natural biodiversity of the borough's green and blue spaces. Adaptation and mitigation must be a crucial consideration in planning and development, to ensure that development in Tower Hamlets will not adversely affect, but rather improve, climate resilience within the borough and London as a whole.

13.5 Tower Hamlets is a low-lying borough that will severely suffer from increased flooding if the effects of climate change are not mitigated in the coming years. Whilst the Thames Barrier and other flood defences currently provide effective protection, their continued maintenance, along with further investment in flood defences, is required. Climate change will increase the risk of flooding, and it will be necessary to consider the ways of mitigating the risk of flooding for the lifetime of a development. The borough also has a number of critical drainage areas which are at higher risk of surface water flooding. London-wide vulnerability mapping indicates that Tower Hamlets at increased risk of overheating resulting from a changing climate, and greater mitigation and adaptation measures must be introduced to cope with the scale of these changes.⁹

⁹ Climate Risk Mapping, GLA (2022)

13.6 Despite this, London has lower rainfall than the national average, whilst having a very high population density. This combination has resulted in London being declared an area of serious water stress and could face future water shortages; a trend that is likely to be exacerbated by climate change.

13.7 The whole of the borough falls within an Air Quality Management Area (AQMA), parts of which exceed the World Health Organisation (WHO) guideline limits and national air quality objectives on harmful pollutants. Air pollution is associated with adverse health impacts which particularly affect the most vulnerable in society.¹⁰

13.8 The policies set out in this chapter support the council's strategic priorities to reduce future emissions arising from new development within the borough, by delivering low-energy developments that require minimum energy for space heating, providing ultra-efficient systems for heating and hot water, combined with high levels of insulation, that will minimise the costs to future occupants.

13.9 This section contains the following policies:

- CG1: Mitigating and adapting to a changing climate
- CG2: Low energy buildings
- CG3: Low carbon energy and heating
- CG4: Embodied carbon, circular economy and retrofit
- CG5: Overheating
- CG6: Managing flood risk
- CG7: Sustainable drainage
- CG8: Water efficient design
- CG9: Air quality
- CG10: Noise and vibration
- CG11: Contaminated land and storage of hazardous substances

¹⁰ Tower Hamlets Air Quality Action Plan (AQAP) 2022-2027

Policy CG1 Mitigating and adapting to a changing climate

1. The council will support development proposals that increase local resilience to the impacts of a changing climate by:
 - a. reducing operational carbon emissions through energy efficient and sustainable design, low carbon heat, and local renewable energy generation;
 - b. adapting to the impacts of a changing climate by ensuring developments mitigate the risk of overheating and flooding;
 - c. promoting efficient use of materials in the construction process in line with the principles of the circular economy, minimising waste and consumption throughout the lifecycle of a building;
 - d. prioritising the reuse and retrofit of existing buildings before design and construction of new buildings to minimise upfront embodied carbon emissions;
 - e. incorporating water efficiency measures to reduce water use and discharges; and
 - f. mitigating and improving poor air quality in the borough, and contributing towards delivering the objectives of the latest Tower Hamlets Air Quality Action Plan (AQAP).

Supporting text

13.10 This strategic policy seeks to support the council's commitment to becoming a net zero carbon borough by 2045, and ensure that future development will protect and enhance the key aspects of the borough's environment while improving the health of local residents by mitigating against the impacts of a changing climate.

13.11 New developments will be expected to be net zero carbon in operation where possible, with low energy use and high thermal efficiency. Developments will be expected to maximise renewable energy generation on site through the use of photovoltaic (PV) panels, reducing dependence on the National Grid and supporting access to low-cost clean energy. Delivering energy efficient buildings will also help to manage the increasing costs of energy bills faced by many borough residents and businesses.

13.12 To achieve net zero carbon, new developments must also minimise embodied carbon, and seek to drive down carbon emissions in the demolition, construction, and maintenance phases of a building. New developments should be designed with consideration of disassembly, reuse, or recycling to encourage sustainable material uses and minimise waste in line with circular economy principles.

13.13 Recent London-wide vulnerability mapping¹¹ indicates that Tower Hamlets is at increased risk of flooding and overheating as a direct result of a changing climate. New development must be planned, designed, and constructed to respond to future anticipated changes in climate, such as warmer winters and hotter summers, and the risks associated with such changes, including increased likelihood of extreme weather events such as droughts, heatwaves, intense rainfall, and flooding.

11 Climate Risk Mapping, GLA (2022)

13.14 In recognition of the borough's areas of flood risk, more vulnerable development should be located away from these areas, as shown on the Policies Map. As part of the council's commitment to reducing the risk of flooding, Tower Hamlets will work closely with national and regional bodies, neighbouring authorities, and relevant landowners to:

- maintain and improve the existing flood defences;
- raise flood defences in line with the Thames Estuary 2100 (TE2100) Plan;
- ensure effective emergency-planning practices are in place;
- keep up-to-date information about flood risk in the borough and likelihood of flood events; and
- enhance multi-functional green space with nature-based drainage systems to alleviate local surface water flood risk, in line with the drainage hierarchy.

13.15 New development must also address London's water stress by reducing water use. London is in an area of severe water stress, but planned growth and development will rapidly increase the demand for water. New developments will need to reduce demand on fresh and wastewater systems and champion sustainable futures through innovations in water efficiency, as well as rainwater harvesting and greywater collection and reuse.

13.16 Development plays a key role in improving air quality and reducing exposure to air pollution. Air quality modelling indicates that the most polluting areas in the borough are along arterial roads. In these areas of sub-standard air quality, nitrogen dioxide levels exceed national air quality objectives, and particulate matter exceed annual mean limits –

(PM_{2.5} levels greater than 10 µg/ m³ (WHO 2005 air quality guideline (AQG) limits) and PM₁₀ levels greater than 40 µg/ m³ (national objective limits). There are no safe levels of air pollution exposure, and health risks associated with particulate matters are a significant cause for concern. The Tower Hamlets AQAP outlines the mitigation measures to reduce people's exposure to air pollution and identifies the ways in which development can improve air quality in the borough.

London Plan policies:

- GG6 Increasing efficiency and resilience
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI5 Water infrastructure

Local Plan policies:

- DV2 Delivering sustainable growth in Tower Hamlets

Evidence base:

- Tower Hamlets Net Zero Carbon Plan, 2020
- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023
- Delivering Net Zero, 2023
- LETI Embodied Carbon Primer, 2020
- Strategic Flood Risk Assessment (2024)
- Air Quality Action Plan, 2022-2027
- Thames Estuary 2100 (TE2100) Plan

Policy CG2 Low energy buildings

1. Development proposals will be supported where they are designed and constructed to be net zero carbon in operation.
2. Development proposals must demonstrate through submission of an energy assessment that energy demand has been minimised, and are required to meet the following Energy Usage Intensity (EUI) standards:
 - a. All residential use proposals must achieve an EUI of no more than 35 kWh/m² GIA/yr.
 - b. Non-domestic buildings should achieve an EUI of no more than the following (where technically feasible) by building type or nearest equivalent:
 - i. Warehouses and light industrial units – 35 kWh/m² GIA/yr;
 - ii. Schools – 65 kWh/m² GIA/yr;
 - iii. Offices, Retail, HE teaching facilities, GP surgeries – 70 kWh/m² GIA/yr; and
 - iv. Hotels – 160 kWh/m² GIA/yr.
3. Development proposals must achieve a space heating demand of less than 15 kWh/m² GIA/yr.
4. Development proposals must demonstrate that the operational energy performance of the development will meet the targets within this policy through the use of a quality assurance standard.
5. Major developments must monitor their total energy use and renewable energy generation and submit the annual figures to the council for the first 5 years of operation.

Supporting text

13.17 Tower Hamlets needs to exceed the zero carbon policies set out in the London Plan for the borough to meet its net zero carbon commitments, and new policies must be bold to reflect the urgency with which the risks associated with climate change must be addressed.¹²

13.18 New buildings must be designed and constructed to net zero carbon standards to enable the council to meet its ambitious zero carbon targets. All new buildings should be designed and built to be net zero carbon in operation, with ultra-low levels of total energy use and space heating demand. These recommendations are in line with recommendations of the Climate Change Committee (CCC), the London Energy Transformation Initiative (LETI) and the Royal Institute of British Architects (RIBA)¹³. Development proposals which do not demonstrate how net zero carbon will be achieved will not be supported.

13.19 Delivering new homes that are as energy efficient as possible is an essential step to address the impacts of the cost-of-living crisis in Tower Hamlets. Buildings that require minimal energy for heating, providing ultra-efficient systems for heating and hot water, combined with high levels of insulation will minimise the costs for future occupants. Achieving the council's zero carbon aspirations will have direct benefits to local residents and communities.

13.20 Part 2 of this policy requires proposals to demonstrate that energy usage has been minimised, by meeting specific Energy Usage Intensity (EUI) target for domestic and non-domestic buildings. The EUI represents the total amount of energy used by a building divided by its floor area (based on gross internal area, or GIA). It is reported in kWh/m² year, and includes both regulated and unregulated energy use. Energy generated by on or off-site renewables does not affect the EUI value.

13.21 The EUI targets set out in this policy are supported by detailed energy modelling as part of the Delivering Net Zero study (2023), which modelled the predictive energy usage of eight building typologies, four domestic and four non-domestic, to identify best-practice targets for low energy-use.

13.22 Part 2(a) identifies an EUI target of no more than 35 kWh/m² GIA/yr for domestic buildings. The definition of domestic refers to a dwelling that houses a single or multiple households. This applies to C3 (Dwellinghouse) and C4 (House in multiple occupation) planning use classes. This target also applies to student or keyworker accommodation, care homes, and extra-care homes.

13.23 Part 2(b) Sets out different targets for non-domestic buildings based on their use, based on extensive predictive energy modelling within the Delivering Net Zero study (2023). Non-domestic buildings include warehouse and industrial, schools, office, retail, and HE facilities, GP surgeries, and hotels. Where a non-domestic development does not have an applicable category of use outlined in the policy, the applicant should discuss with the council to identify an appropriate EUI target.

¹² Tower Hamlets Net Zero Carbon Plan (2020) Pg 31

¹³ Delivering Net Zero (2023)

13.24 Part 2(b) Sets out different targets for non-domestic buildings based on their use, based on extensive predictive energy modelling within the Delivering Net Zero study (2023). Non-domestic buildings include warehouse and industrial, schools, office, retail, and HE facilities, GP surgeries, and hotels. Where a non-domestic development does not have an applicable category of use outlined in the policy, the applicant should discuss with the council to identify an appropriate EUI target.

13.25 Part 2(b) (vi) sets the EUI target for hotels at 160 kWh/m² GIA/yr. This is higher than the EUI set out in the GLA Energy Assessment Guidance. This can be attributed to the high energy consumption per m² in hotels due to high catering loads and domestic hot water usage. An updated target has been recommended in the Delivering Net Zero study (2023), which will drive energy and fabric efficiency in hotel design.

13.26 Part 3 requires development proposals to meet a space heating demand of 15 kWh/m² GIA/yr or less.¹⁴ This figure applies to all domestic and non-domestic building types. Space heating demand is the amount of heat energy needed to heat a building over a year, and is a measure of the thermal efficiency of a building. Space heating demand is influenced by a number of design and specification decisions, including building form and orientation, insulation, airtightness, windows and doors, and the type of ventilation system used. Buildings with a low space heating demand are more thermally efficient and lose heat slowly. This makes it easier to maximise the contribution from renewable energy sources and will result in lower heating and energy costs for residents and businesses.

13.27 For the council to achieve net zero carbon aspirations, it is essential that new buildings deliver the intended energy performance. It is common for the actual energy performance of a building to fail to meet the design standard, which is known as 'the performance gap'. Part 4 requires development proposals to use an assured performance method to demonstrate that the performance gap has been minimised. The assured performance method must be recognised by an accredited industry body. This includes (but is not limited to) the Passivhaus standard, the Building Energy Performance Improvement Toolkit (BEPIT), and the Association for Environment Conscious Building (AECB) standard. Other standards may be used with agreement of the council.

13.28 Furthermore, Part 5 requires major developments to report on energy performance for at least five years following completion, as per the London Plan "Be Seen" requirement, and following the GLA Energy Assessment Guidance (2022). The council intends to publish further guidance on submitting an energy assessment.

London Plan policies:

- GG6 Increasing efficiency and resilience
- SI 2 Minimising greenhouse gas emissions

Local Plan policies:

- DV2 Delivering sustainable growth in Tower Hamlets

Evidence base:

- Tower Hamlets Net Zero Carbon Plan, 2020
- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023
- Delivering Net Zero, 2023

¹⁴ 'UK housing – fit for the future?' Climate Change Committee (2019)

Policy CG3 Low carbon energy and heating

1. All development proposals must use clean and efficient sources of energy, maximising on-site renewable energy generation, storage, and use, through appropriate technologies. The amount of energy generated in a year should aim to supply 100% of the predicted annual energy demand of the building.
2. New developments must not be connected to the gas grid and heat must be provided through zero or low carbon fuels. Gas boilers in domestic or non-domestic developments will not be supported.
3. Major development proposals must prioritise connections to heat networks to support the delivery of net zero carbon emissions solutions for clean, green, and integrated energy systems.
4. Developments with significant heat rejection, such as data centres, must be built ready to supply waste heat to a heat network, including all necessary on-site infrastructure required to facilitate a future connection.
5. Development proposals must submit an energy assessment which demonstrates:
 - a. how on-site renewable energy and/or heat generation has been maximised; and
 - b. how heat network providers have been engaged with.
6. through the energy assessment that the development proposal:

Energy offsetting will only be considered as a last resort, and if it can be demonstrated

 - a. does not use fossil fuels on-site for heat or energy;
 - b. has a level of EUI and space heating demand compliant with levels set in Policy CG2; and
 - c. onsite renewable energy generation (e.g. through PVs) has been maximised.
 - d. If all conditions are met, the applicant should establish the shortfall between predicted renewable energy generation to enable the annual renewable energy generation to match the EUI in kWh. The applicant should pay a cash-in-lieu contribution equivalent to generating this energy shortfall.

Supporting text

13.29 This policy seeks to support the council's commitment to low carbon heating and supply of clean energy. New buildings cannot continue to burn fossil fuels for heating if Tower Hamlets is to stay within carbon budgets. Low carbon heat is therefore an essential component of a net zero carbon building. New buildings should contribute to the significant increase in renewable energy generation required between now and 2045.

13.30 Part 1 of this policy seeks to maximise the use of renewable and low carbon energy sources in all new buildings. Development proposals will be required to maximise renewable energy generation on site, matching or exceeding the predicted annual energy use, i.e. renewable energy generation (kWh/m²/yr) = or > EUI (kWh/m²/yr). The most robust method to deliver a balance between total energy use and renewable energy generation for new buildings at a system level is to seek to achieve this balance at the site level. This would also have the advantage of low-cost electricity close to its point of use, helping to deliver energy cost savings for building users.

13.31 Part 2 seeks to ensure that new development will utilise low carbon heating. This is in line with national legislation which will ban the installation of gas boilers in new homes from 2025¹⁵. It also reflects the high carbon costs of combined heat and power (CHP) systems, which often generate power through burning fossil fuels or biomass fuels.

13.32 The carbon content of electricity has been steadily reducing in recent years. In the 2000's, when electricity had a carbon content of approximately 500 gCO₂ e/kWh, heating systems that used gas such as boilers and CHP were considered more environmentally friendly options. This has now changed completely: the de-commissioning of coal-fired power stations and the rise of renewable energy have meant the annual average carbon content of electricity is now around 150-200 gCO₂ e/kWh, and is predicted to reduce further over the next decade.

13.33 Low carbon alternatives that are currently available include heat pumps and direct electric heating. Heat pumps use refrigerant to efficiently move heat from one place to another. Heat pumps can provide both space heating and domestic hot water, can serve individual homes or communal heating systems, and are highly energy efficient (typically around 250-300% for an air source heat pump).¹⁶

13.34 Tower Hamlets is classified as a Heat Network Priority Area (HNPA)¹⁷, meaning that the heat density in Tower Hamlets is sufficient for heat networks to provide a feasible solution for heating buildings. Heat networks can provide a cost-effective and low carbon solution for heating in dense urban contexts, and support Tower Hamlets' transition to a zero carbon borough.

13.35 Part 3 of this policy identifies the need for new developments to connect to heat networks. All heat sources, including ambient and waste heat and significant heat rejection, present opportunities to decarbonise the borough's heating systems and achieve its net zero carbon emissions target. All new developments that emit waste heat must ensure on-site provision is made to future-proof an easy connection to

¹⁵ Heat and Buildings Strategy, Department of Business, Energy & Industrial Strategy (2021)

¹⁶ Delivering Net Zero (2023)

¹⁷ www.london.gov.uk/programmes-strategies/environment-and-climate-change/energy/london-heat-map

future heat networks. This includes the provision of heat exchangers, thermal stores, pipework connections at the site boundary, and heat supply agreements to heat network operators.

13.36 Heat network operators supplying to residential properties should be registered participants in the Heat Trust scheme and each district heating network shall be a Heat Trust registered scheme. Where existing heat networks have not decarbonized, sleeving shall be applied for the connection of new development.

13.37 In addition, a new primary electrical substation will be required on the Isle of Dogs by 2030 as identified in the Opportunity Area Framework and the Isle of Dogs Feasibility Study (Electrical Connectivity) to support ongoing development as well as the electrification of heat and transport and to reduce the pressure on the congested electrical routes currently supplying the island. This will be established on the site of a customer requiring electrical connection.

13.38 To ensure new developments are compatible with future low carbon heating systems, large scale developments should be designed to accommodate heat network connections or communal systems, with adequate space provided for energy centres, plant rooms and distribution pipework within the building.

13.39 For smaller-scale developments where communal and heat network solutions are less likely to be feasible, individual heating systems such as air source heat pumps and ground source heat pumps should be prioritised as low carbon heat options.

13.40 New developments should also explore the uses of smart controls such as building energy management systems to ensure thermal comfort to building occupants which optimises the performance of networked heating solutions such as heat networks and communal systems.

13.41 Part 5 requires all development proposals to submit an energy assessment which demonstrates how on-site renewable energy and/or heat generation has been maximised, and how heat network providers have been engaged with. Applicants should refer to the GLA Energy Assessment Guidance (2022) for further guidance on submitting an energy assessment.

13.42 Part 6 outlines the conditions that must be met to permit energy offsetting through a cash-in-lieu contribution. The CCC has a clear position on carbon offsetting - offsetting must have a very limited role if we are to achieve national targets of zero carbon by 2050. Cash-in-lieu contributions for carbon offsetting calculated at £/tonne CO₂ will not be accepted. Energy offsetting will only be considered where the development has sought to minimise the building's predicted energy usage and maximised PV generation on site. If council officers are satisfied that the development complies with these policy requirements, a cash-in-lieu payment will be accepted to offset the residual difference between energy use and renewable energy generation. In these circumstances, the applicant should establish the shortfall between predicted annual energy usage and annual renewable energy generation. The applicant should pay into the council's offset fund a sum of money equivalent to this shortfall.

13.43 The offset price will be set on the basis of cost to install PVs elsewhere in the borough. Using a reasonable cost rate for a high output PV system with micro-inverters (i.e. £1.016/kWp) and applying a 10% additional rate for administering and managing the PV funding process, would give an energy offset price of £1.32/kWh/yr.

13.44 The energy offset contribution = Energy Gap (kWh) x £1.32/kWh and will be secured via planning obligation. The energy offset contribution is based on calculations from the Delivering Net Zero report (2023). The offset cost calculation may be updated as required, reflecting the varying costs of energy and project delivery.

London Plan policies:

- GG6 Increasing efficiency and resilience
- Sl2 Minimising greenhouse gas emissions

Local Plan policies:

- DV7 Utilities and digital connectivity
- EG6 Data centres

Evidence base:

- Tower Hamlets Net Zero Carbon Plan, 2020
- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023
- Delivering Net Zero, 2023
- GLA Energy Assessment Guidance (2022)
- Local Plan Topic Paper – Utilities and Heat Networks (2024)



Policy CG4 Embodied carbon, retrofit and the circular economy

1. Major developments must assess the whole lifecycle carbon emissions of a development by undertaking a Whole Life Carbon (WLC) assessment.
2. Major development proposals should achieve the following LETI 2020 best practice upfront embodied carbon emissions targets for building elements:
 - a. Domestic buildings should achieve upfront embodied carbon limits of 500kg CO₂/m² or less; and
 - b. Non-domestic buildings should achieve upfront embodied carbon limits of 600kg CO₂/m² or less.
3. Development proposals should adopt a circular economy approach to design and construction to reduce waste and minimise embodied carbon emissions. Major development proposals are required to submit a circular economy statement in accordance with the London Plan and Circular Economy Statements LPG (2022).
4. Development proposals should adopt a retrofit-first approach, prioritising retrofit and refurbishment of existing buildings over demolition and construction. Where demolition is proposed, it should be justified by demonstrating that options for retaining the existing buildings and the carbon cost of demolition have been fully explored, by:
 - a. Undertaking a pre-demolition audit which demonstrates how materials will be reused;
 - b. demonstrating how energy and waste will be minimised in the design and construction of the new building, through reuse of materials on-site or ensuring new materials are sustainably sourced and low impact;
 - c. designing for durability and flexibility, disassembly, and reuse at the end of their useful life; and
 - d. demonstrating how the design could support modification, adaption, or retrofitting to suit new uses in the future.
5. Existing buildings are encouraged to undertake retrofit work to improve energy efficiency and reduce environmental impacts. Where planning permission is required for retrofit work, development proposals must submit a retrofit plan, demonstrating how operational carbon will be reduced.

Supporting text

13.45 Whole life carbon (WLC) emissions are the total carbon emissions resulting from the construction, operation, maintenance, and end-of-life/ reuse of a building. WLC encompasses both the operational carbon emissions associated with a building's use, and the embodied carbon emissions associated with production, sourcing and transport of building materials, construction, repair and replacement, and finally end-of-life / reuse of a building.

13.46 To achieve WLC reductions, all emissions from energy used in the material manufacture, construction, operation, maintenance, and end-of-life phases of a building must be measured and reduced. Current best practice for reducing embodied carbon emissions requires designing for disassembly and using low carbon materials; the lowest carbon materials available are those which can be repurposed from existing buildings, in accordance with circular economy principles.

13.47 Part 1 requires all major development proposals to undertake a Whole Life Carbon assessment (WLCA). This requires applicants to calculate operational and embodied carbon emissions and demonstrate how they can be reduced as part of the WLCA. Requiring all major development proposals, not just referable schemes, to undertake a WLCA will help to support the Tower Hamlets' 2045 net zero carbon borough targets, as the construction and development comprises a significant portion of the borough's carbon emissions. It will also drive resource efficiency and adoption of circular economy principles, by encouraging refurbishment, retention, and reuse of existing materials and buildings before demolition and new construction. Applicants may undertake the required Whole Life Carbon reporting using the templates provided by either the London Plan Guidance or the updated RICS Professional Statement.

13.48 Part 2 encourages new development to utilise best practice methods in sustainable design and construction to minimise embodied carbon emissions, and sets best practice upfront embodied carbon emissions targets for new domestic and non-domestic buildings that major development proposals should achieve.

13.49 At present, there are no standardised national targets for embodied carbon emissions due to limited evidence and research on the topic, and the lack of consistent measurements and benchmarks is a key issue faced by the construction industry. Delivering an alignment in embodied carbon measurement is an important interim step towards developing net zero carbon targets that reflect the UK's carbon budget. To address the issue of misaligned targets, LETI have identified best practice targets for upfront embodied carbon, which refers to the initial amount of embodied carbon associated with the building (Building Life Cycle Stages A1-A5 excluding sequestration).

13.50 The LETI Embodied Carbon Target Alignment document sets out an embodied carbon rating system, which outlines total embodied carbon targets and upfront carbon targets. These targets have been developed in collaboration with industry groups, including CIBSE, RIBA, and the GLA, and are being adopted by a number of local authorities in lieu of national and regional embodied carbon targets.

13.51 The LETI Embodied Carbon Primer (2020) identifies that current 'business as usual' building design (without implementing embodied carbon reductions) result in upfront carbon emissions of around 800kg CO₂/m² for domestic and 1,000kg CO₂/m² for non-domestic buildings, equivalent to a LETI band 'E' rating. Current best-practice performance projects in the design phase are able to achieve a LETI band 'C' rating, equivalent to 500kg CO₂/m² for domestic and 600kg CO₂/m² for non-domestic buildings. These targets are equivalent to 40% reduction over

baseline for upfront embodied carbon. Studies from LETI and RIBA both indicate that these limits are achievable and deliverable using industry current best practice. These targets are also consistent with the Whole Lifecycle Carbon Assessment LPG 'Aspirational WLC benchmark' targets for upfront emissions.

13.52 Parts 3 and 4 seek to embed the principles of a circular economy into the design and construction process by retaining materials in use at their highest value for as long as possible, which are then reused or recycled, minimising building waste being sent to landfill. Materials with the lowest embodied carbon costs are those reused and repurposed from existing buildings. Development proposals should consider the whole lifecycle of the building at the earliest stage in the planning process in line with the circular economy principles, including maximising opportunities for material reuse, and designing for disassembly.

13.53 London Plan Policy SI7 defines the circular economy as a 'new economic model that moves away from this current linear economy, where materials are mined, manufactured, used and thrown away, to a more circular economy where resources are kept in use and their value is retained.' The built environment is the largest user of materials and generator of waste in the economy, and accounts for 54% of total waste in London. Moving to a circular economy approach will have a number of benefits for individuals, developers, as well as the natural environment, namely:

- reduce the impact of demolition and waste on air and noise quality;
- reduce the demand for virgin materials;

- drive material optimisation and waste minimisation, reducing material and disposal costs for developers; and
- encourage innovation in material use in design, to ensure buildings can adapt to a variety of uses throughout their lifetime, and
- structures and materials can be dismantled or deconstructed and reused at the end of their life.

13.54 Development proposals should adopt the circular economy hierarchy to inform key decisions in the design and development process. This prioritises a 'retrofit-first' approach, which encourages refurbishment and repurposing of buildings. Where this is not possible, demolition must be fully justified by demonstrating that options for retaining the existing buildings have been explored, and the carbon reductions/ environmental benefits/ public benefits of the new development will outweigh the carbon costs of development. Applicants must also undertake a pre-demolition audit to identify a bill of materials and assets that can be recovered for reuse. Developers are encouraged to sign up to a materials hub platform, to maximise the recovery and reuse of existing materials in other developments.

13.55 Part 5 of this policy seeks to encourage retrofit of existing buildings. New buildings make up only a small percentage of the borough, and to achieve Tower Hamlets' zero carbon aspirations existing buildings will need to undergo retrofit to improve energy efficiency, thermal efficiency, and end reliance on fossil fuels.

13.56 Best practice retrofit can bring multiple social, environmental, and economic benefits, such as reducing energy bills, improving comfort, and supporting national decarbonization efforts. However, a poor or

piecemeal retrofit can miss the opportunity to maximise environmental benefits, and result in need for further retrofit works in the future. Poorly considered retrofitting interventions can even have a negative impact; for example, it is crucial that improvements attempting to enhance energy and carbon performance of homes do not worsen the risk of overheating.

13.57 Where retrofitting works require planning permission, development proposals should submit a retrofit plan, which includes an energy improvement strategy. A retrofit plan demonstrates how retrofitting has been considered comprehensively across the building, using a 'whole building approach', which provides a holistic overview of how a building has been constructed, its context, and the factors affecting energy use. The retrofit plan should demonstrate a consideration for the most suitable retrofit works for the context of the building. Additional guidance on retrofit best practice and developing a retrofit plan is available in the Climate Emergency Retrofit Guide (LETI) and Key Considerations for Commercial Retrofit (UKGBC).

13.58 Where retrofit works for listed buildings or non-designated heritage assets are proposed, developers are advised to engage with the council's design and heritage team at the earliest opportunity, as well as review relevant guidance from Historic England.

London Plan policies:

- SI2 Minimising greenhouse gas emissions
- SI7 Reducing waste and supporting the circular economy

Local Plan policies:

- DV4 Planning and construction of new development
- RW1 Managing our waste

Evidence base:

- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023
- Delivering Net Zero, 2023
- LETI Climate Emergency Retrofit Guide, 2021
- LETI Embodied Carbon Primer, 2020
- LETI Embodied Carbon Alignment document
- Whole Life-Cycle Carbon Assessments LPG, 2022

Policy CG5 Overheating

1. Development proposals must ensure that buildings (both internally and externally) and the spaces around them are designed to avoid overheating and excessive heat generation, while minimising the need for internal mechanical cooling systems and providing sufficient daylight and sunlight levels.
2. Development proposals must submit proof of ability to meet the Building Regulations Part O, using passive design cooling principles only, provided as part of the planning application.
3. All domestic development proposals must submit the Good Homes Alliance 'Early Stage Overheating Risk Tool'. If a medium or high-risk score (>8) is indicated, applicants should undertake dynamic thermal modelling.
4. Major non-domestic development proposals should undertake full dynamic thermal modelling and achieve summer thermal comfort according to CIBSE TM52 requirements.



Supporting text

13.59 London-wide climate risk mapping¹⁸ indicates that Tower Hamlets is at increased risk of overheating as a direct result of a changing climate. Overheating can cause not only significant discomfort to residents and building users, but adverse impacts to health and well-being, and even loss of life. However, relying on mechanical air-conditioning systems to cool buildings can be energy intensive, ineffective, and can cause discomfort to building users. Large developments in particular have the potential to alter the local climate.

¹⁸ Climate Risk Mapping, GLA (2022)

For example, a light-coloured building that reflects heat will stay cool on the inside and the outside, whereas a dark building will absorb heat during the day to raise internal temperatures and slowly release this heat as the temperature cools, warming the local air temperature. Internal air-conditioning systems also produce heat which increases the outside temperature and contributes to the urban heat island effect.

13.60 Part 1 seeks to incentivise good design to minimise the risk of overheating and maximise the effectiveness of passive strategies to avoid the need for active cooling, which brings additional embodied and operation carbon emissions and increased energy costs for residents.

13.61 Part 2 requires development proposals to demonstrate compliance with Building Regulations Part O (2021) using passive measures only without the use of mechanical cooling. These regulations require new developments to demonstrate that the amount of heat entering a building during the summer is minimised, and that excess heat can be adequately removed from the indoor environment.

13.62 The following passive strategies could be used to mitigate the risk of overheating:

- dual aspect ventilation;
- minimum window openable area should be 60% of the total window area, while providing safe and secure openings in accordance with building regulations;
- reduced glazed area on the north, east, and west facades, in respect of minimum daylight requirements;

- external, moveable shading devices (e.g. external shutters or brise-soleil) on east and west facing windows;
- fixed or moveable horizontal shading devices (e.g. awnings) on south facing windows;
- adequate roof insulation;
- reflective walls and roof coating (high albedo materials);
- exposed thermal mass can be used in living areas where night-time ventilation through windows is possible; and
- all ground floor and first level windows should be equipped with safety devices to allow for safe opening of windows at night, with minimum 20% openable free area.

13.63 Design to avoid overheating should be balanced in consideration with impacts of noise and air quality to building users. For example, an over-reliance on opening windows as a passive cooling method would not be appropriate as the only source to mitigate heating in areas of high air pollution and noise pollution, or near existing industrial uses. It may also pose safety risks to ground floor uses. Likewise, design interventions to mitigate overheating which limit natural daylight and sunlight, such as reducing size or quantity of windows, should be avoided, and balanced with cumulative impact to a building's users.

13.64 Where buildings are unable to rely solely on passive cooling measures such as natural ventilation to achieve comfortable conditions due to surrounding pollution or noise levels, mechanical cooling systems will be considered. However, the building should be designed so that, if noise and pollution conditions are resolved in the future, Part O compliance can still be achieved based on passive strategies for domestic buildings and CIBSE TM52 compliance can still be achieved using passive strategies for non-domestic buildings. A full overheating report should be submitted to demonstrate compliance with Part O/ CIBSE TM52 in case of no noise and pollution constraints.

13.65 As per the cooling hierarchy in the London Plan, active cooling systems will only be considered as a last resort. Development proposals that do not robustly justify that compliance with Building Regulations Part O is achievable using passive cooling methods only may not be supported.

13.66 Part 3 requires domestic development proposals to submit the Good Homes Alliance 'Early Stage Overheating Risk Tool'. If a medium or high-risk score (>8) is indicated, applicants should undertake dynamic thermal modelling based on the CIBSE TM59 methodology.

13.67 Part 4 requires major non-domestic development proposals to undertake full dynamic thermal modelling and achieve summer thermal comfort through passive strategies only in the majority of the building, according to CIBSE TM52 requirements. Exceptions can be made for small, enclosed rooms that do not have access to natural light (such as meeting rooms in offices). The CIBSE DSY1 for the 2020s, High Emissions, 50th percentile scenario for Central London should be used for the modelling.

13.68 For both Parts 3 and 4, where the dynamic modelling approach is followed to prove compliance with Part O, the building should also be tested under future weather conditions using the following weather files:

- CIBSE 2080 Low Emissions, 50th percentile weather file for Central London to represent the 2°C GW scenario.
- CIBSE 2080 High Emissions, 50th percentile weather file for Central London to represent the 4°C GW scenario.

13.69 If the assessment fails under future weather files, this should be highlighted in the overheating report as a potential risk.

London Plan policies:

- D6 Housing quality and standards
- SL4 Managing heat risk

Local Plan policies:

- HF9 Housing standards and quality
- CG9 Air quality
- CG10 Noise and vibration

Evidence base:

- Tower Hamlets Net Zero Carbon Policy Evidence Base, 2023

Policy CG6 Managing flood risk

1. Development proposals must implement measures to avoid, control, manage, and mitigate the risk of flooding by incorporating resilience and adaptation measures, and should be made safe for its lifetime without increasing the risk of flooding elsewhere. To meet this requirement, development proposals must:

- a. assess the risk of flooding from all sources as informed by the Strategic Flood Risk Assessment (SFRA) or subsequent updates of the evidence and best available data;
- b. be located in areas with the lowest risk of flooding as suitable for the vulnerability level of the proposed uses, as informed by passing the Sequential Test, and if required, the Exception Test; and,
- c. provide a site-specific Flood-Risk Assessment (FRA) in accordance with national requirements, the SFRA, and Environment Agency guidance.

2. A site-specific FRA is required for all development proposals within Flood Zone 2, 3a, 3b, and all major development within Flood Zone 1. The FRA should include:

- a. a sequential test if the development is in Flood Zone 2 or 3;
- b. the risks of both on and off-site flooding to and from the development for all sources of flooding including fluvial, tidal, surface run-off, groundwater, ordinary watercourse, sewer, and reservoir, as well as cumulative risk from multiple sources;

- c. an assessment of breach and overtopping of main river defences;
- d. the impact of climate change using the latest government guidance;
- e. demonstration of safe access and egress;
- f. mitigation measures, taking account of the advice and recommendations set out in the Tower Hamlets SFRA; and,
- g. development design needs to be resilient to and adapt to flooding and allow quick recovery after a flood.

3. Site design of development which meets criteria outlined in Part 2 above is required to:

- a. undertake a sequential approach to development layout to direct highest vulnerability uses to areas of the site with lowest flood risk from all sources; and
- b. incorporate flood resilience and/or resistance measures.

4. Development proposals are required to protect and where possible increase the capacity of existing water spaces and flood storage areas to retain water.

5. Development proposals are required to enable effective flood risk management through:

- a. ensuring buildings are setback from the River Thames and the River Lea and its tributaries by the following distances unless significant constraints are evidenced:

- i. A minimum of a 16-metre buffer strip along a tidal river; and
 - ii. A minimum of a 10-metre buffer strip along a fluvial river.
- b. optimising opportunities to realign or set back defences and improve the riverside frontage to provide amenity space and environmental enhancement.
6. Development proposals must contribute to the delivery of the measures set out in the Thames Estuary 2100 Plan and prepare for raising of defences without negatively impacting amenity in coordination with adjacent plots. Plots including or adjacent to protected wharfs should ensure early consultation and coordination.
7. The construction of new basements, and extension of or change-of-use of existing basements, should give due regard to flood risk and ensure that flood risk on and off site as well as risk to life and property are not increased, and that flood flows, including groundwater flows, are not disrupted.

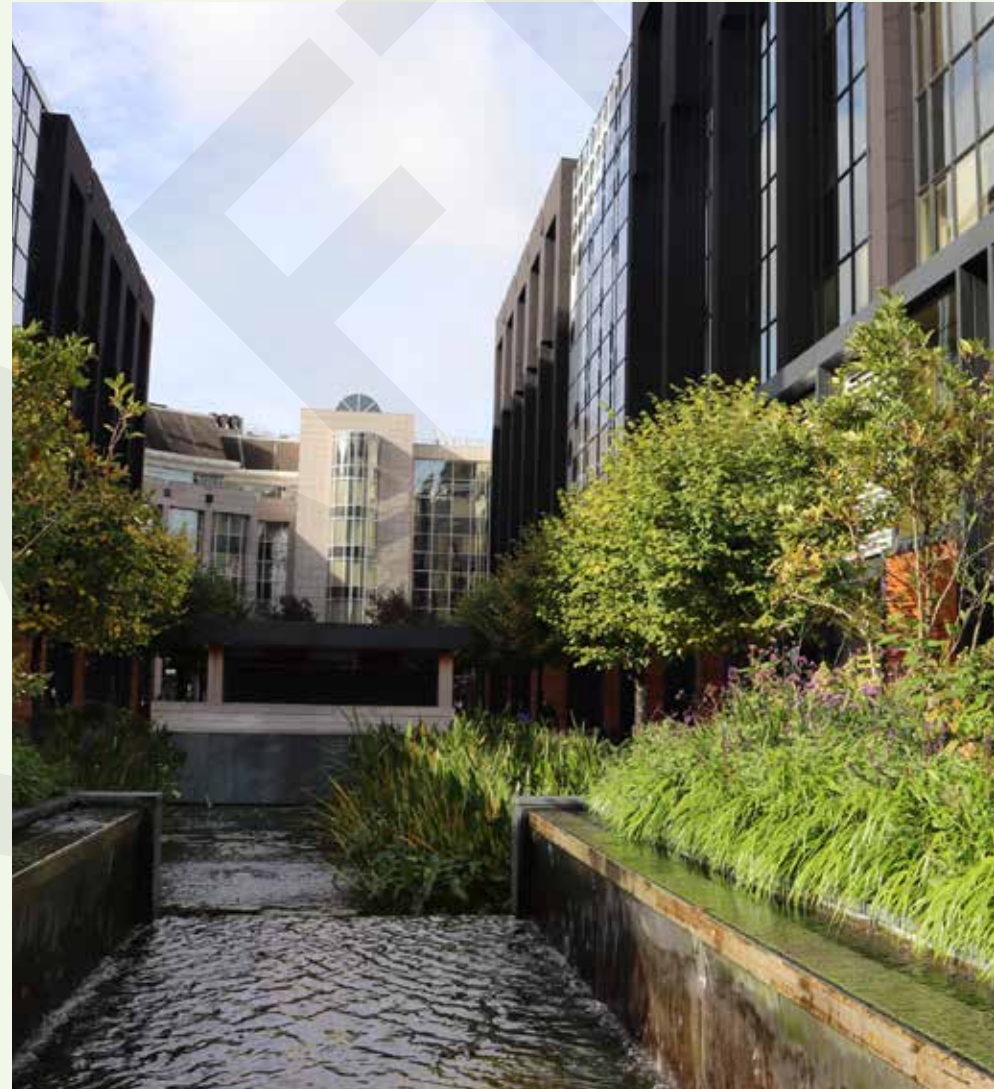
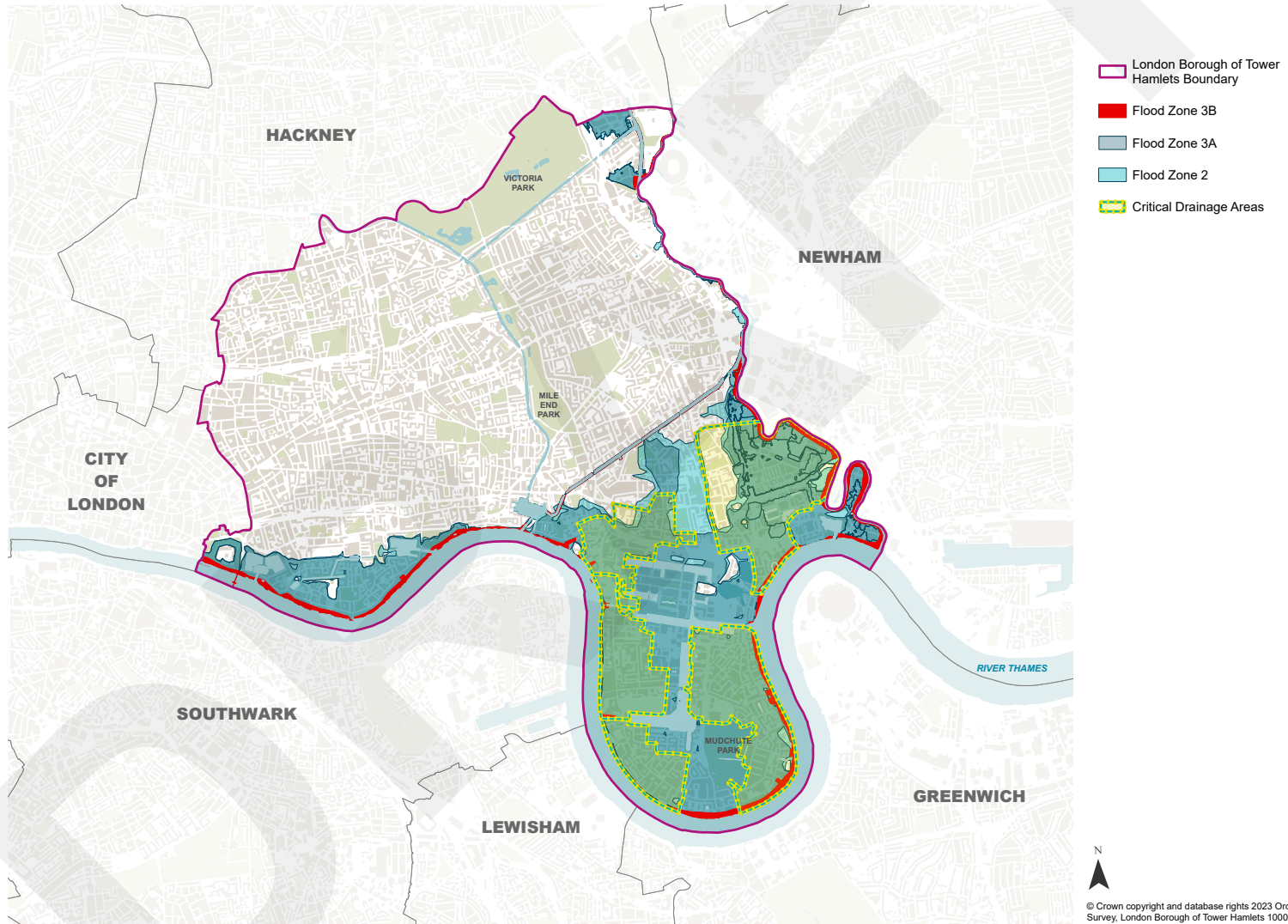


Figure 7: Flood zones map



Supporting text

13.70 Large parts of Tower Hamlets, including the Isle of Dogs and Lower Lea Valley, are in medium to high-risk flood areas (zones 2 and 3). The flood risk zones are shown on the Policies Map and Figure 7. New development must not increase the risk of flooding and must provide mitigation measures to reduce their impact on flood risk, including enabling the repair, raising, and further delivery of flood defences.

13.71 Part 1 of the policy seeks to ensure that new development does not increase the risk of flooding, and that development proposals work proactively to minimise and mitigate flood risk from all sources. Applicants are advised to seek early engagement with relevant stakeholders, including the council as the Lead Local Flood Authority, the Environment Agency, Thames Water, and Port of London Authority. For Part 1 (b), the vulnerability of uses is defined within the NPPF and is contained in the latest SFRA.

13.72 As per the Flood Risk and Coastal Change PPG:

- highly vulnerable uses will not be permitted within flood zone 3a and 3b;
- essential infrastructure and more vulnerable uses within flood zone 3a must pass the exception test; and
- highly vulnerable uses within flood zone 2 must pass the exception test.

13.73 Highly vulnerable uses include a self-contained basement without internal access to the upper floors above breach level. More vulnerable uses include a basement with access to upper floors above the breach level. All basement developments are required to conduct a basement



impact assessment to demonstrate that proposals safeguard structural stability, are safe from a flood risk perspective, and will not have any adverse impacts on local hydrogeology. It should take account of the guidance provided in the SFRA.

13.74 Basements being used for sleeping accommodation is classified as a highly vulnerable use, as per Annex 3 of the NPPF, and as such will not be permitted within Flood Zone 3 or within the tidal breach flood extent. This is in line with Table 2 of the PPG for Flood Risk and Coastal Change. Furthermore, sleeping accommodation will not be permitted below the

tidal breach flood level, in line with national planning policy. This is not limited to basements, and can apply to ground and higher floors, where sleeping accommodation is proposed below the breach flood level.

13.75 To address Parts 2 and 3, the flood risk assessment should also:

- be proportionate with the degree of flood risk that the proposed development is exposed to and may exacerbate;
- consider the cumulative impact of existing and future development; and
- demonstrate where adjacent to flood defences that development will safeguard and maintain the existing flood defences over its lifetime.

13.76 Developments within site allocations which seek to deliver their allocated use do not have to undertake a sequential test, even if the site is in flood zone 2 or 3, as required under Part 3(a).

13.77 Flood resistance refers to constructing a building in such a way as to prevent floodwater entering the building and damaging its fabric. Flood resilience means that a building is constructed in such a way that, although flood water may enter the building, its impact is minimised (i.e. no permanent damage is caused, structural integrity is maintained and drying and cleaning are facilitated). It must be noted that, as per paragraph 68 of the Flood Risk and Coastal Change PPG, flood resistance and resilience measures cannot be used to justify development in inappropriate locations. Water entry strategies are not acceptable for More/ Highly Vulnerable developments. Furthermore, temporary/ demountable barriers are not appropriate for new build developments.

13.78 Part 5 should also be considered alongside Policy BO1 Green and blue infrastructure and BO3 Water spaces. The requirement to include

an adequate buffer zone between waterways and developments applies to main rivers only (as identified in the Tower Hamlets SFRA). It is to enable sustainable and cost-effective flood risk management, including upgrading of river walls and embankments.

13.79 All tidal rivers should have a minimum of 16m buffer strip, and all fluvial rivers should have a minimum 10m buffer strip. This should be measured from the bank to the top to provide an effective and valuable river corridor which improves habitat connectivity. New or additional hard standing waterways within the buffer zones will be discouraged.

13.80 Where the preferred level of setback is unachievable, current and future flood risk must be alleviated to the satisfaction of the Environment Agency and through consideration of the specific recommendations of the Thames Estuary 2100 Plan. This can include:

- raising existing flood defences to the required levels in preparation for future climate change impacts or otherwise demonstrating how tidal flood defences can be raised in the future, through submission of plans and cross-sections of the proposed raising (in particular to demonstrate that the development does not preclude future raising of the defence in line with the Thames Estuary 2100 Plan);
- demonstrating improved access to existing flood defences and safeguarding land for future flood defence raising and landscape, amenity and habitat improvements;
- maintaining, enhancing or replacing flood defences to provide adequate protection for the lifetime of the development;
- where opportunities exist, re-aligning or setting back flood defence walls and improving the river frontage to provide amenity space, habitat, access, and environmental enhancements in line with the TE2100 Plan's riverside strategy approach; and

- requiring the delivery of flood risk management infrastructure and/or improvement measures that mitigate directly related impacts from the development, where these have been identified in the Tower Hamlets Infrastructure Delivery Plan.

13.81 These setback requirements align with the Biodiversity Net Gain (BNF) Rivers Metric assessment, and can also contribute towards opportunities for public access and recreation, as outlined in Policy BO2 Open spaces and the Green Grid network.

13.82 Riparian landowners are responsible for maintaining and raising tidal flood defences, and should follow the latest good practice guidance such as the Estuary Edges guidance.

13.83 Part 7 requires new basements, and extensions, or change of use of existing basements, to ensure that flood risk on and off site as well as risk to life and property are not increased, and that flood flows, including groundwater flows, are not disrupted. Furthermore, new must basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. This is only applicable where there is a waste outlet from the basement, ie, where the basement includes toilets, bathrooms, utility rooms, etc. Applicants should show the location of the device on the drawings submitted with the planning application.

London Plan policies:

- SI12 Flood risk management

Local Plan policies:

- BO1 Green and blue infrastructure
- BO2 Open spaces and the green grid network
- BO3 Water spaces

Evidence base:

- Thames River Basin Management Plan, 2022
- Strategic Flood Risk Assessment (SFRA), 2017
- Strategic Flood Risk Assessment: Update (SFRA) (emerging)
- Local Flood Risk Management Strategy, 2016-2022
- Isle of Dogs and South Poplar Integrated Water Management Plan, 2020
- Sub-regional Integrated Water Management Strategy for the Lower Lea Valley (2023)
- Thames Estuary 2100 (TE2100) Plan
- Estuary Edges

Policy CG7 Sustainable drainage

1. Development proposals are required to reduce the risk of surface water flooding through demonstrating how they reduce the amount of water run-off and discharge from the site through the use of appropriate water reuse and sustainable drainage systems (SuDS) techniques.
2. Any development, refurbishment, or change of use that is likely to increase foul drainage should increase the sustainable drainage capacity on site. If this is not possible and the amount of impermeable surfaces would increase, the developer must provide evidence that combined discharges to sewers will not increase.
3. All major development proposals and any development within Critical Drainage Areas must submit a Surface Water Drainage Strategy which demonstrates that surface water will be controlled as near to its source as possible in line with the sustainable drainage systems hierarchy.
4. Rainwater reuse and nature-based drainage systems must be prioritised over grey SuDS and discharge off-site. Where below ground attenuation tanks are included, monitoring and adaptive control technology should be installed and at least 50% of annual stored water volume reused on site.
5. Development proposals are required to ensure the following run-off standards:
 - a. new development proposals in areas defined in the Integrated Water Management Plan (IWMP), those areas shown in the SFRA as suffering from the risk of surface water flooding, in critical drainage areas, and adjacent sites that flow into the critical drainage area, are required to achieve a greenfield run-off rate and volume leaving the site;
 - b. all other major development proposals must achieve greenfield runoff rate and volume leaving the site;
 - c. where the above flow and volume reductions cannot be achieved on site, a financial contribution will be secured to offset the shortfall; and
 - d. proposals for zero discharge developments will be supported.
6. The design for SuDS are required to:
 - a. follow the requirements set out in Section G of the Environment Agency's Approach to Groundwater Protection;
 - b. be submitted to the SuDS Approving Body (SAB) for review;
 - c. be constructed in line with the most up to date CIRIA manuals, LBTH SuDS guidance, Sewers for Adoption, and any additional requirements an Adopting Body may have; and
 - d. Guarantee the life-time management and maintenance for every aspect of the drainage system.
7. New development proposals, major development proposals and change of use are required to minimise the pressure on the combined sewer network by removing surface water runoff from the sewers.
 - a.

Supporting text

13.84 A further source of flood risk is from surface water flooding. This arises following periods of intense rainfall when the volume and intensity of a rainfall event exceeds the capacity of the drainage system, resulting in localised flooding. Current critical drainage areas in the borough are in the Isle of Dogs, with other smaller areas of high surface water flood risk found throughout the borough. These are shown on the Policies Map and Figure 7.

13.85 The July 2021 floods highlighted London's vulnerability to flooding caused by extreme rainfall. Subsequent research has shown that these events could have happened anywhere in London if the intense rains had fallen in different locations. The impact of flooding goes beyond the material loss and the time spent to get residences and businesses back into use, the risk of loss of life, long term trauma and value impact on properties are very real. With climate change affecting rainfall patterns and sea levels, such events as the July 2021 storms and floods are set to increase in frequency, intensity, and over larger affected areas.

13.86 Recent holistic studies of the local water environment, namely, the Isle of Dogs and South Poplar Integrated Water Management Plan (IWMP) and the Sub-regional (Lower Lea Valley) Integrated Water Management Strategy (SIWMS), have shown that traditional sewerage-based solutions can no longer meet the demand for increased drainage capacity, posed by the combination of development and climate change. Both studies, and indeed integrated water management strategies and plans developed for other parts of London, have shown that SuDS, with emphasis nature-based source control elements, can

significantly reduce the risk and impact of flooding while providing the multiple additional social, economic, and environmental benefits of green infrastructure. Furthermore, implementing a catchment-based approach can deliver positive outcomes for the borough's water environment by promoting a better understanding of the environment at a local level, and interventions upstream benefit sites downstream from a water quality perspective.

13.87 To reduce the amount of water being discharged from sites, this policy requires development proposals to reduce the run-off from all impermeable finishes. When assessing the requirements of this policy, consideration will be given to the size, scale, and nature of the development and whether relative provision has been made. Even minor developments (e.g. rear extensions) have the ability to provide sustainable drainage measures. This policy also anticipates that Schedule 3 of the Flood and Water Management Act is expected to come into force in 2024, and will introduce a mandatory requirement for development proposals to implement SuDS.

13.88 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 BO5, and green grid requirements outlined in Policy BO2, as SuDS can also have biodiversity and urban greening benefits. Applicants should demonstrate that they have considered different types of SuDS, prioritising SuDS which deliver multiple benefits, their ability to remove pollutants, their capacity, and future maintenance.

13.89 SuDS also play an important role in improving the quality of surface water run-off in the borough. Applicants are encouraged to refer to the Thames River Basin Management Plan and Water Framework Directive (WFD) to ensure that SuDS intercept and reduce urban run-off rates, such as through soakaways or permeable paving, in order to protect the borough's water bodies and their associated elements.

13.90 To satisfy the requirements of Parts 1, 2 and 3, all major development proposals and any development within a Critical Drainage Area is required to submit a Surface Water Drainage Strategy including the London Sustainable Drainage Proforma with the planning application. All other relevant development proposals are strongly encouraged to do so.

13.91 Part 2 also seeks address where a development, refurbishment or change of use will increase foul drainage, this will be balanced with reduction of surface water run-off to ensure that discharge to the combined sewerage network will not increase.

13.92 To satisfy the requirements of Part 5, surface water reduction and the required run-off rates should be achieved by following the sustainable drainage systems hierarchy, which is outlined in the London Plan. Infiltration SuDS techniques should only dispose of clean surface water into suitable ground and include stages of the SuDS treatment train as required. They should not be used for foul discharges or trade effluent, and may not be suitable within source protection zone 161 (as defined by the Environment Agency).

13.93 As per Part 5(c), where new development cannot meet the discharge requirements on site after providing evidence that all reasonable effort has been made, it is permissible to pay into a Drainage Offset fund. This will be secured as a financial contribution and will

be invested by LBTH to reduce surface water discharges in existing building stock by the same amount, to achieve the overall drainage target. The methodology for calculating the financial contribution is set out in Appendix 2. Alternative strategies to financial contributions may be sought through agreement with the Environment Agency (EA) and Lead Local Flood Authority (LLFA).

13.94 Part 6 requires all SuDS designs to be submitted to the SuDS Approving Body (SAB) for their review and comment. Submissions should include:

- the prioritisation of nature based "on the surface" SuDS in line with the SuDS hierarchy;
- design criteria, discharge quantity and quality information;
- evidence of amenity and biodiversity benefit with clear links to Biodiversity Net Gain and Urban Greening Factor submissions, in line with policies BO4 & BO5;
- a construction method statement; and
- establishment and long-term management and maintenance information.

13.95 Given the industrial history of Tower Hamlets, discharges of surface water run-off to ground at sites affected by land contamination or from sites used for the storage of potential pollutants may require an environmental permit. This applies especially to sites where storage, handling or use of hazardous substances occurs (for example, garage forecourts, coach and lorry parks/turning areas and metal recycling/vehicle dismantling facilities). These sites will need to be subject to risk assessment with acceptable effluent treatment provided.

13.96 Part 7 seeks to reduce the pressure on the existing combined sewer network by significantly lowering the rate of discharge and

removal of large volumes of surface water from the system, which currently limit the capacity of the sewer system in certain parts of the borough, particularly the Isle of Dogs Opportunity Area. This will help to manage the significant increase of foul water discharge which planned developments in the borough will generate, without increasing the risk of sewer flooding in Critical Drainage Areas and reducing the need for combined sewer system upgrades.

13.97 Tower Hamlets is predominantly served by combined sewers, draining foul and surface water discharges towards Thames Water's Beckton Sewage Treatment Works. Combined sewer overflows discharge excess water to the Thames during heavy storm events, even after the Tideway tunnel is completed. To accommodate additional foul drainage from new development in the existing sewers, surface water discharges from sites need to be reduced. The construction of new sewers is not viable due to significant below ground congestion in many areas, delivery timescales, disruption, and cost.

London Plan policies:

- Sl13 Sustainable drainage

Local Plan policies:

- DV7 Utilities and digital connectivity
- BO1 Green and blue infrastructure
- BO2 Open spaces and the green grid network
- BO3 Water spaces
- BO5 Urban Greening

Evidence base:

- Strategic Flood Risk Assessment (SFRA), 2017
- Strategic Flood Risk Assessment: Update (SFRA) (emerging)
- Local Flood Risk Management Strategy, 2016-2022
- Isle of Dogs and South Poplar Integrated Water Management Plan, 2020
- Thames Estuary 2100 (TE2100) Plan
- Storm overflows discharge reduction plan, 2023
- London Sustainable Drainage Action Plan (LSDAP)
- Sub-regional Integrated Water Management Strategy for the Lower Lea Valley (2023)
- Water and drainage offset study (2023)
- Local Plan Topic Paper – Sustainable Drainage Systems (SuDS) (2024)

Policy CG8 Water efficient design

1. Development proposals are required to reduce mains water consumption through efficiency and substitution measures. This should be achieved by:
 - a. new major residential development proposals must achieve a maximum mains water use of 80 litres per person per day for internal use, plus an additional 5 litres per person per day where external green space is provided;
 - b. making use of fittings with water consumption below those listed in Building Regulations Part G table 2.2;
 - c. domestic refurbishment must meet all BREEAM water efficiency credits;
 - d. non-domestic development and refurbishment should earn at least 75% of available BREEAM water efficiency credits; and
 - e. major development proposals that can demonstrate they are unable to meet the above targets on site must make a financial contribution to the council to offset the shortfall elsewhere.
2. Alternatively, new development proposals should demonstrate how they achieve and maintain performance that qualifies for Thames Water's Tier 2 Infrastructure Charge Environmental Discount.
 3. Development proposals which achieve Water Neutrality or Thames Water's Tier 3 Infrastructure Charge Environmental Discount will be supported.
 4. All new major residential and non-residential development proposals must install water supply and drainage pipework suitable for the separate collection of rain, grey, and foul water as well as the distribution of non-potable water throughout the development from and to all relevant fitments. All major residential and non-residential refurbishment and change of use should aim to retrofit rain and greywater recycling systems.

Supporting text

13.98 London is an area of serious water stress,¹⁹ but the overall demand for water is growing rapidly. Current building standards are insufficient to manage water scarcity. By 2044, the total difference between demand for water and available water will be over 360 million litres of water per day, unless innovative solutions to address water supply and efficiency are delivered.²⁰

13.99 Part 1 of this policy seeks to reduce the pressure on fresh and wastewater systems through reducing demand and requiring high levels of water efficiency in all new developments. The London Plan requires new residential development to reduce water consumption to 105 litres per person per day or less, which acknowledges the water scarcity prevalent in London. As Tower Hamlets indirectly draws its mains water resource from the river Lee, where groundwater abstractions need to be reduced significantly to avoid the destruction of precious and globally unique chalk stream habitats, it is necessary to reduce local mains water demand below building regulations.

13.100 Data analysis of water demand undertaken as part of the IWMP for the Isle of Dogs and South Poplar found that a London Plan compliant base-demand usage of 105 litres was easily achievable in new residential units through efficient fixtures and fittings alone; innovative solutions such as reuse systems would result in a total potable demand of 75 litres per person per day. To reflect this, part 1(a) requires all new residential developments to achieve maximum mains water use of 80 litres per person per day. This target seeks to support the growth of sustainable communities which are resilient to the impacts of water scarcity.

¹⁹ Water Stressed Area – Final Classification, Environment Agency (2021)

²⁰ Isle of Dogs and South Poplar Integrated Water Management Plan, (GLA, 2020)

13.101 Part 1(b) requires new development proposals to maximise water efficiency measures by using fittings with water consumption below those listed in Building Regulations Part G (2021) or relevant updates.

Table 2: Maximum fittings consumption optional requirement level in Building Regulations Part G (2021).

Water fitting	Maximum consumption
WC	4/2.6 litres dual flush
Shower	8 l/min
Bath	170 litres
Basin taps	5 l/min
Sink taps	6 l/min
Dishwasher	1.25 l/place setting
Washing machine	8.17 l/kilogram

13.102 The use of genuinely water efficient fittings can lead to significant water, energy, and financial savings. Fittings need to be selected to be rated within the central or a better performance band of the voluntary Unified Water Label or the emerging UK mandatory water efficiency label.

13.103 All other residential development proposals must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that

the water efficiency standards are met.

13.104 Part 1(c) and 1(d) relate to requirements to achieve BREEAM water efficiency credits. Building Research Establishment Environmental Assessment Method (BREEAM) applies to non-residential developments and residential developments arising from conversions and changes of use. This method provides a holistic assessment of the environmental sustainability of a development.

13.105 Part 1(e) outlines an offset approach for major development proposals that demonstrate they are unable to implement reuse measures which meet the proposed targets on site. In these circumstances a financial contribution will be secured to offset the shortfall and achieve the overall water efficiency target. Applicants will be expected to pay a price £/litre per person of demand reduction they are unable to achieve. Contributions will be used for water consumption offset to be achieved elsewhere in the borough. The methodology for calculating the financial contribution will be set out in Appendix 2.

13.106 Part 2 is an alternative methodology to encourage innovation and use of technologies that collect and/ or reuse water. To be eligible for a Thames Water Tier Two Environmental Discount, development proposals are required to demonstrate that they have incorporated water reuse technology, such as rainwater harvesting, greywater recycling, and/ or other water reuse technologies, that captures at least 50 litres of water use /property /day for reuse. Evidence, that Thames Water will grant the Environmental Discount is to be provided.

13.107 Measures to achieve Parts 1 and 2 will require 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 rainwater 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 re-use and rainwater harvesting system. Where such a system is not feasible or practical, development must demonstrate to our satisfaction that this is the case. Development proposals are expected to submit a water efficiency calculator to demonstrate how they have met this requirement.

13.108 Part 4 requires all new major development proposals to install "dual plumbing" (potable and non-potable pipework systems as well as separate rain, grey and foul water collection) and to design for the installation of rainwater harvesting and grey water re-use systems, to provide improved future resilience. Dual plumbing will allow buildings to

be connected to sources of reused water as they are developed in the future, supporting the development of a market for reused water.

13.109 As the cost of providing clean mains water is set to increase over the lifetime of developments and retrofit is often prohibitively expensive and disruptive to residents, it is required that all major new development has the facility to generate and use non-potable water for uses such as WC flushing. To this end the building's plumbing system is to be able to collect storm runoff and grey water separately for reuse while foul water can be discharged to sewer. The water distribution system also is to be able to supply fittings as sinks and showers with potable quality water, while WCs are to be fed from a separate system that can distribute non-potable water. A suitable plantroom area for the required equipment is to be identified.

13.110 In addition, Part 4 requires major and non-major residential refurbishment and change of use applications to seek to retrofit rain and greywater recycling systems in order to achieve lower water consumption rates in existing buildings, address existing inefficiencies and maximise future proofing for increasing water demand in the borough. London Plan Policy SI 5 states that retrofitting should occur wherever possible, and the retrofitting of existing spaces and buildings is also a priority of the London Sustainable Drainage Action Plan.

London Plan policies:

- SI5 Water infrastructure

Local Plan policies:

- DV7 Utilities and digital infrastructure
- CG7 Sustainable drainage

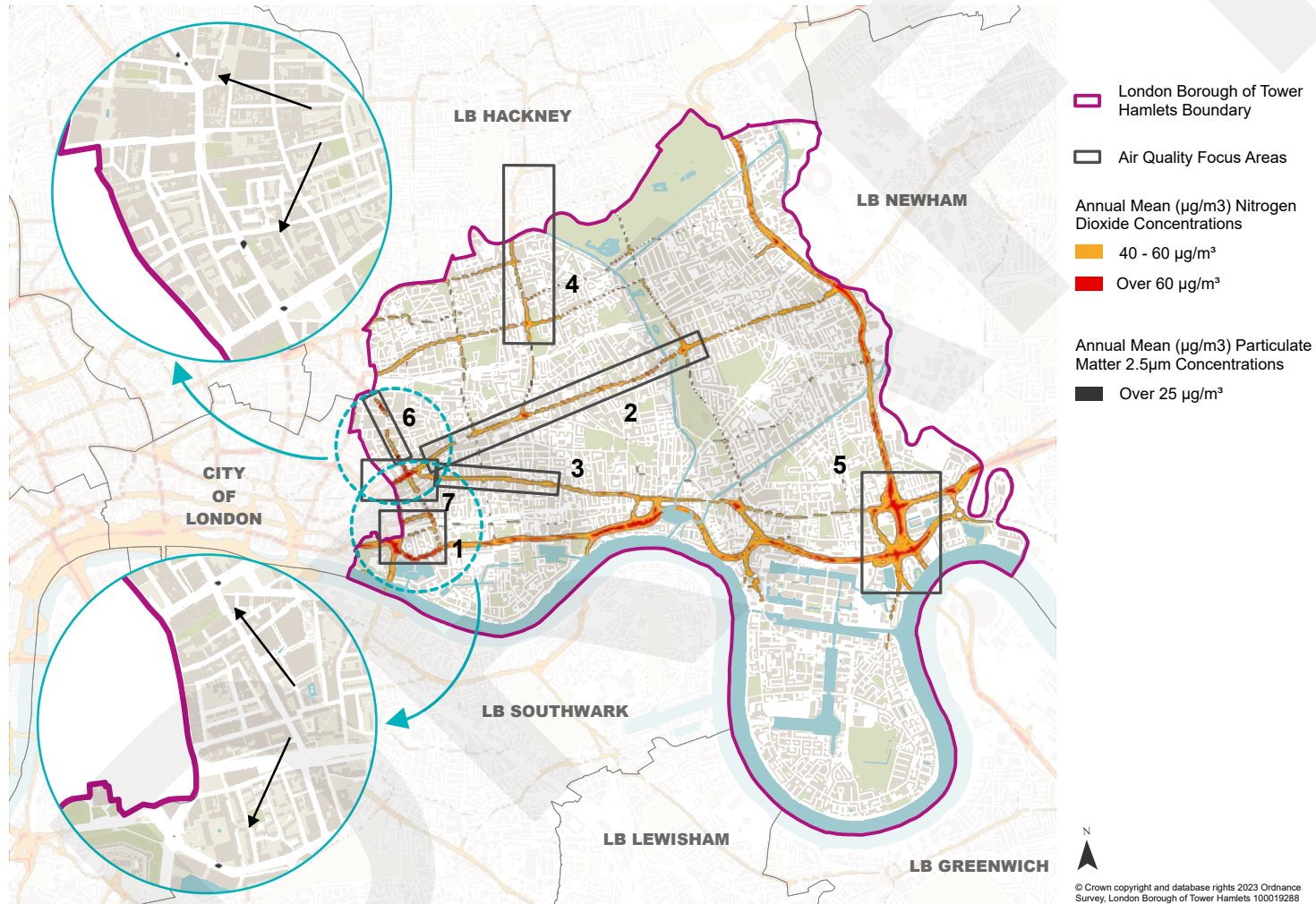
Evidence base:

- Isle of Dogs and South Poplar Integrated Water Management Plan, 2020
- Sub-regional Integrated Water Management Strategy for the Lower Lea Valley (2023)
- Tower Hamlets Water and Drainage Offset Study (2023)
- Local Plan Topic Paper – Water Efficiency (2024)

Policy CG9 Air quality

1. All development proposals should mitigate and improve poor air quality. Large-scale development proposals, and major development within Air Quality Focus Areas should achieve 'air quality positive' standards, in line with the Air Quality Positive LPG (2023). All other development proposals are required to meet or exceed the 'air quality neutral' standard.
2. An air quality impact assessment, based on current best practice, is required as part of the planning application for:
 - a. major developments proposals;
 - b. developments which will require substantial earthworks, or partial or complete demolition;
 - c. developments which include education and health facilities or open space (including child play space);
 - d. new build developments in areas of sub-standard air quality (as designated and shown on the Policies Map).
3. Where an air quality assessment indicates that a development will cause harm to air quality or where end users could be exposed to poor air quality, development will be resisted unless mitigation measures are adopted to reduce the impact to acceptable levels.
4. Measures to improve air quality should be implemented onsite. Where it is robustly demonstrated that this is not possible, off-site measures may be accepted, such as financial contributions to deliver air quality improvement measures in the Tower Hamlets AQAP.
5. New build developments proposals which provide any private, communal, publicly accessible open space or child play space in areas of sub-standard air quality are required to demonstrate that they have considered positioning and design of the open space to minimise exposure of future users to air pollution.
6. Development proposals for new residential and commercial moorings on waterways should include an electrical hook-up at each mooring point; where demonstrated that this is not possible, other clean energy alternatives such as solar panels must be considered.

Figure 8: Air quality map



Supporting text

13.111 LBTH is committed to reducing the exposure to poor air quality within Tower Hamlets. Levels of nitrogen dioxide and particulates (PM₁₀ and PM_{2.5}) are of particular concern, due to their impacts on human health²¹. Air pollution is associated with a number of adverse health impacts, which more acutely affect the most vulnerable in society, particularly children, older people, and individuals with heart and lung conditions..

13.112 Between 2017 and 2022, Tower Hamlets saw a significant improvement to air quality within the borough. In 2016, 77% of the borough's population was living in an area that exceeded the UK legal limit for nitrogen dioxide (NO₂) annual mean concentration of 40ug/m³ (micrograms per cubic metre). According to modelling projections undertaken in 2019, this had reduced to 7.5% of the Borough's population.²² This could be attributed to a number of factors, including improvements in vehicle emissions standards, update of electric vehicles, introduction of Ultra Low Emissions Zones (ULEZ) and local measures to improve air quality.²³

13.113 However, there are no safe limits for air pollution, and the health risks associated with particulate matters, PM₁₀ and PM_{2.5}, continue to be a significant cause for concern. In 2021, 7% of deaths among people in Tower Hamlets were attributed to particulate air pollution (PM_{2.5}), compared to 5.5% in England.²⁴

13.114 Air quality modelling from the London Atmospheric Emissions Inventory (LAEI) 2019 shows that the most polluting roads in the borough are along the arterial roads, including the A13, the Blackwall Tunnel Approach and the Highway. In these areas, the levels of levels of nitrogen dioxide and particulates (PM_{2.5} and PM₁₀) exceed WHO 2005 air quality guideline limits and, in the case of nitrogen dioxide, European Union safe legal limits /national air quality objectives.²⁵ The London Environment Strategy (2018) sets commitments to meet the WHO health-based interim guideline limits across London by 2030. In 2021 the WHO issued more stringent guidelines for particulate air pollution, and the council aspires to meet the updated guideline values for PM_{2.5} in the shortest possible timeframe.

13.115 In addition, seven Air Quality Focus Areas (AQFAs) have been identified in the borough. These are areas that have been identified as having high levels of pollution and human exposure, as shown on Figure 8. The AQFAs are reviewed periodically based on LAEI data, and may be subject to change in the future.

13.116 Part 1 requires large-scale development proposals and major development within Air Quality Focus Areas to adopt an 'air quality positive' approach. Air Quality Positive is a process of identifying and implementing methods to push development proposals beyond air quality neutral standards, as set out in the Air Quality Positive LPG (2023). Developments will be required to submit an Air Quality Positive statement as part of the Air Quality Assessment, in line with GLA

21 Tower Hamlets Joint Strategic Needs Assessment: Strategic Planning and Health (2016)

22 London Atmospheric Emissions Inventory (LAEI) (GLA, 2019)

23 LBTH Air Quality Action Plan (AQAP) 2022-27

24 Public Health Outcomes Framework Data, OHID (2021)

25 LBTH Air Quality Action Plan (AQAP) 2022-27

guidance, to demonstrate how benefits to local air quality have been maximised, and how measures to minimise pollution exposure will be implemented. Certain development proposals outside of AQFAs may also be required to submit an Air Quality Positive statement, this will be reviewed on a case-by-case basis by the council's Air Quality team.

13.117 All other development proposals will be required to achieve the air quality neutral benchmarks as set out in the London Plan. These benchmarks set out the maximum allowable emissions of NO_x and particulate matter based on the size and use class of the proposed development. There are two sets of benchmarks covering the main two sources of air pollution from new developments:

- Building Emissions Benchmark (BEB) – emissions from equipment used to supply heat and energy to the buildings; and
- Transport Emissions Benchmark (TEB) – emissions from private vehicles travelling to and from the development.

13.118 Both benchmarks must be achieved for a development proposal to be considered air quality neutral. Applicants should refer to the Air Quality Positive LPG and Air Quality Neutral LPG for further guidance.

13.119 Part 2 requires that an air quality assessment be undertaken for all major development proposals, proposals which will require substantial earthworks or demolition, proposals pertaining to education and health facilities or open space (including child play space), and all new development proposals within areas of sub-standard air quality (as shown on the Policies Map).

13.120 Areas of sub-standard air quality refer to areas where nitrogen dioxide levels exceeding 40 µg/m³ (the European Union legal limit / national air quality objectives). This includes areas in which the particulates (PM_{2.5}) levels exceed 25µg/ m³ annual mean levels (UK



annual limit) as identified on the Policies Map and Figure 8. Please note: air quality fluctuates and applications should be guided by the latest available monitoring data.

13.121 The air quality assessment must consider the potential impacts of pollution from the development on occupants of the site and neighbouring areas during construction and operational phases. It should also consider the cumulative impact of surrounding developments located within a 1-kilometre radius. The air quality assessment and the construction management plan should contain details of compliance with European emissions standards.

13.122 Major development proposals are also required to include a dust assessment. Proposals that would give rise to diffuse air pollution must consider the potential for effects on European sites of nature conservation importance, in particular Epping Forest.

13.123 The air quality assessment must also outline the measures to mitigate any adverse effects during construction or operation. This could include:

- reducing vehicular traffic levels;
- encouraging sustainable movement patterns;
- methods of carrying out construction;
- actions to reduce emissions throughout the lifetime of the building;
- reducing emissions from associated plant equipment;
- improving or greening the public realm; and
- ensuring decentralised energy facilities do not contribute to poor air quality.

13.124 As per Part 3, measures to reduce exposure to poor air quality could include the following (in order of priority):

- minimize g distance from pollutant source (the recommended distance would be over 50 metres from the pollution source);
- considering proven ventilation systems;
- parking considerations (in accordance with our transport policies);
- the use of winter gardens, instead of balconies;
- internal layout and minimize g internal pollutant emissions; and
- the materiality of the building envelope and any other structures.

13.125 Maximising distance from pollutant source allows for air pollution to disperse and can reduce exposure. In some cases, this could also take the form of improvements to the public realm, such as introduction of nature-based solutions that can act as a green buffer to reduce exposure to air pollution. However, green infrastructure itself is not a solution to air pollution.

13.126 As per Part 4, where it is demonstrated that measures to improve air quality cannot be delivered on site, an offsetting contribution may be agreed with the council in the form of a cash-in-lieu payment, to deliver the air quality improvement measures offsite. The method for calculating the offset payment is set out in Section 5 of the Air Quality Neutral LPG.

13.127 Part 5 requires new private, communal, publicly accessible open space, and child play spaces that are proposed in areas of sub-standard air quality to demonstrate that the positioning and design has been considered to minimise the exposure of future users, particularly vulnerable users, to air pollution. The recommended distance within the AQAP is 50 meters from the pollution source.

13.128 Moorings for residential boats are present in many locations across Tower Hamlets, and the number of such boats on waterways across London is increasing (water space study, 2017). Furthermore, a number of basins connected to the river Thames, such as Limehouse Basin and St Katharine Docks, are primarily used for residential moorings. Heating systems on houseboats are typically fuelled by burning oil, natural gas, wood, or coal. This contributes to poor air quality around the borough's waterways, with solid fuel sources (wood and coal) being the most inefficient/ polluting, leading to high levels of nitrogen dioxide and particulate matter. Part 6 of this policy therefore requires development

proposals including new moorings to provide suitable infrastructure to enable houseboats to use electricity for heating when moored. This will support the decarbonisation of houseboats in the borough and promote better air quality around the borough's waterways. Applicants are recommended to discuss their proposal for new moorings with the Canal & River Trust and Port of London Authority (PLA) where appropriate.

London Plan policies:

- GG3 Creating a healthy city
- SI1 Improving air quality

Local Plan policies:

- DV3 Healthy communities
- DV4 Planning and construction of new development
- CG5 Overheating
- HF9 Housing standards and quality

Evidence base:

- Air Quality Action Plan, 2022-2027
- Using green infrastructure to protect people from air pollution (GLA) 2019

DRAFT

Policy CG10 Noise and vibration

1. Development proposals are required to:
 - a. adopt good acoustic design in accordance with the Institute of Acoustics' Professional Practice Guidance (ProPG): Planning & Noise – New Residential Development, using the most appropriate layout, orientation, design, and use of buildings to minimize noise and vibration impacts;
 - b. identify and outline mitigating measures to manage noise and vibration from new development, including during the construction phase;
 - c. separate noise-sensitive development from existing operational noise; and
 - d. provide a noise assessment where noise-generating development or noise-sensitive development is proposed.
2. Where new noise-sensitive land uses are proposed in proximity to existing noise-generating uses, the 'Agent of Change' principle requires the proposal for new development to robustly demonstrate how conflict with existing uses will be avoided, through mitigation measures.
 3. Development proposals are required to demonstrate that the level of noise emitted from any new heating or ventilation plant will be below the background level by at least 10dBA, or comply with guidance set out in the latest version of British Standard 4142.
 4. For new residential development proposals that are located within ambient noise level areas determined to be at the significant observed adverse effect level (SOAEL) or above, the developer will be required to provide information to prospective occupants about the mitigation measures that have been put in place, to reduce the risk of post-purchase/ occupancy complaints.²⁶ This will be secured by planning obligation.

²⁶ Noise Guidance, DLUHC (2019)

Supporting text

13.129 This policy seeks to manage noise and vibration from new development and manage existing sources of noise on sensitive development. Noise and vibration can have a significant impact on local amenity and well-being. According to the WHO, excessive noise can cause a number of short- and long-term health problems, including sleep disturbance, cardiovascular effects, and cause poor performance at work and school.

13.130 The Increasingly high-density and mixed-use nature of development in Tower Hamlets means it is essential that building design and use minimises noise pollution and disturbance. Part 1 of this policy sets out measures to minimise noise from new development and separate noise-sensitive uses such as housing, hospitals, and schools from existing noise sources where practicable to protect the amenity and well-being of the surrounding area.

13.131 Where required, the noise assessment should consider the following:

- source and absolute level of the noise together with the time of day it occurs, considering day-time and night-time noise where appropriate
- for non-continuous sources of noise, the number of noise events, and the frequency and pattern of occurrence of the noise;
- pitch and tone of the noise;
- the cumulative impacts of more than one source should be taken into account along with the extent to which the source of noise is intermittent and of limited duration; and
- 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.

13.132 Where the avoidance of noise conflicts is impractical, mitigation measures such as effective soundproofing for noise attenuation (e.g. appropriate glazing and building materials) and restrictions on operating hours will be implemented through appropriate planning conditions. The cumulative impact of mitigation measures to reduce noise must be considered alongside measures taken to reduce overheating and exposure to poor air quality.

13.133 There have been several examples across London of long-standing entertainment venues closing or becoming at risk of closure due to a combination of factors, including noise complaints from new residents and venues being purchased for redevelopment (particularly for housing). This has implications for the long-term future of London's creative and cultural sector which has an impact not just on residents but also its tourism potential.²⁷ Part 2 uses the Agent of Change principle to seek to reduce this phenomenon. This principle may also apply to other noise-generating uses, such as schools, sporting and entertainment venues, industrial sites, waste sites, safeguarded wharves, rail, and other transport infrastructure. The Agent of Change principle places responsibility for noise management on the incoming individual or business. 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 it has not been robustly demonstrated that the operations of nearby uses would not be compromised, development proposals will be refused.

13.134 Part 3 sets requires heating and ventilation plants to be designed

²⁷ Rescue Plan for London's Grassroots Music Venues Update, (GLA, 2017)

so that they do not adversely affect nearby amenities, including open spaces, which are valued for their quiet environment. At present, the level of noise emitted from any new heating or ventilation plant must be below the background level by at least 10dBA. However, it is understood that British Standard 4142 will be updated in the near future, and this policy should be read to reflect these updated requirements.

13.135 Significant observed adverse effect level (SOAEL) is the level of noise exposure above which can have a significant adverse effect on health and well-being. Part 4 requires developers of residential units in SOAEL areas to provide information to prospective occupants about the noise mitigation measures that have been put in place. This is to ensure that prospective buyers and occupants are made fully aware of the effects of noise in the area and the mitigation measures that have been implemented to reduce the risk of post-occupancy noise complaints. This will be secured by planning obligation.

13.136 Appendix 5 provides further guidance on how this policy will be implemented.

London Plan policies:

- D13 Agent of Change
- D14 Noise

Local Plan policies:

- DV4 Planning and construction of new development
- HF9 Housing standards and quality
- CG5 Overheating



Policy CG11 Contaminated land and storage of hazardous substances

1. Where development is proposed on contaminated land or potentially contaminated land, a desk study, site investigation, and risk assessment in line with current guidance and the Tower Hamlets Contaminated Land Strategy (2022) is required and remediation proposals agreed to deal with the contamination before planning permission is granted.
2. Development proposals will not be supported which involve the storage or use of hazardous substances or which are located in close proximity to hazardous installations where it would cause a significant threat to health and the environment.
3. Certain contaminating developments, processes or land uses proposed within or in close proximity to sensitive locations, including source protection zones, may not be acceptable.

Supporting text

13.137 Part 1 of this policy provides additional guidance on protecting health of the borough's residents and workers and the environment from contaminants and hazardous substances. This should be read in conjunction with the guidance set out in the London Plan.

13.138 Contaminated land is land that has been polluted with harmful substances to the point where it now poses an unacceptable risk to health and the environment. Tower Hamlets has a history of industrial land uses and this policy seeks to ensure that the impacts of these past and current land uses do not affect the health of people and the environment. An updated public register of contaminated land is available on the Tower Hamlets website, and any site included in the register or any site which is potentially contaminated will be required to carry out a site investigation and agree a scheme of mitigation with the council to ensure that contaminated land issues are considered at the planning application stage.

13.139 Contamination applies not only to land and soil contamination, but to groundwater contamination. Development proposals should protect and enhance groundwater quality, and should not have any adverse impact on groundwater flow, quantity or quality. A verification report will be required through condition to provide confirmation that the remediation work has been undertaken properly in line with best practice.

13.140 Part 2 of the policy relates to the management of hazardous substances which are outlined in the Planning (Hazardous Substances) Regulations (2015). There are a small number of listed hazardous installations in or near to the borough. Hazardous substances are also controlled by the need for a separate hazardous substances consent. As

such, it will be necessary to demonstrate that any developments which involve hazardous substances would not cause a significant hazard to the health and well-being of local residents or to the local environment.

13.141 The council will apply the Health and Safety Executive's (HSE) land use planning methodology in the event of a proposal being located near to a hazardous installation. In combination with advice provided by the HSE, 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 arising from the proposed development would significantly outweigh the potential risks to health and the local environment.

13.142 Source protection zones are spatial areas around public drinking water abstraction points. Locations of source protection zones are available on the Environment Agency's website. Applicants are advised to speak to the council's environmental health service and the Environment Agency, where relevant.

London Plan policies:

- SD1 Opportunity Areas

Local Plan policies

- DV3 Healthy communities
- DV4 Planning and construction of new development

Evidence base:

- Strategy For the Identification of Contaminated Land, 2022

14. People, places and spaces



PS1 – Design-and infrastructure-led approach to development

PS2 – Tall buildings

PS3 – Securing design quality

PS4 – Attractive streets, spaces and public realm

PS5 – Creating inclusive places

PS6 – Heritage and historic environment

PS7 – World heritage sites

PS8 – Shaping and managing views

PS9 – Shopfronts

PS10 – Advertisements, hoardings and signage

PS11 – Siting and design of telecommunications infrastructure



Introduction

14.1 This chapter focuses on delivering places and spaces in the borough that are designed around the needs of local communities for good-quality housing and a reduction in overcrowding, ensuring that Tower Hamlets is a borough that everyone can feel proud to live in and excited to spend time in. The policies in this chapter seek to ensure that new development takes place in a way that complements the existing character of our places, while taking advantage of the potential capacity for growth that some parts of the borough demonstrate. They require new development to be well-designed, safe, accessible, and inclusive, and to pay careful attention to the layout, scale and form of buildings

and spaces, the connections between them, and the mitigation of their impacts, such as noise and air pollution. The policies in this section also provide a framework for ensuring that new development respects and enhances the natural and built heritage of the borough. Through good design, development should contribute to the health, well-being, and social inclusion of the borough's communities.

14.2 At the same time, the policies in this section also take a new approach to tall buildings, allowing the consideration of greater height across more of the borough. Taller buildings will still be restricted in sensitive areas, such as conservation areas and nature sites, but beyond these places tall buildings will be considered and assessed where appropriate heights are proposed in line with the requirements of policy PS2. This will help to optimise housing capacity, and provide an uplift in affordable housing.

14.3 Tower Hamlets consists of a number of distinctive, diverse, and vibrant places, including historic hamlets, ancient markets, urban parks, inland docks, urban farms, a world heritage site, and many other types of place. These places have evolved gradually over many years and their characteristics, both modern and historic, make up the distinct identity of the borough. The diverse places and communities of the borough also contribute to the character of the wider East End of London.

14.4 Tower Hamlets is experiencing high levels of growth and development and has done so for many years; it is important to ensure that the borough can successfully accommodate continued change and growth while also preserving those distinctive elements that are so valued by local communities and by those who come to Tower Hamlets from further afield for employment or leisure.

14.5 This section contains the following policies:

- PS1 – Design-and infrastructure-led approach to development
- PS2 – Tall buildings
- PS3 – Securing design quality
- PS4 – Attractive streets, spaces and public realm
- PS5 – Creating inclusive places
- PS6 – Heritage and historic environment
- PS7 – World heritage sites
- PS8 – Shaping and managing views
- PS9 – Shopfronts
- PS10 – Advertisements, hoardings and signage
- PS11 – Siting and design of telecommunications infrastructure

Policy PS1 Design-and infrastructure-led approach to development

1. The council will support development proposals that are design-led and respond to a site's context and capacity for growth to determine the appropriate form and land use for the site and where they deliver on the borough's needs for housing, employment, retail, and community space, and to create sustainable communities. All development proposals should demonstrate how the proposed capacity of the development has been informed by:

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- a. the form and layout of the site, within its context, including appropriate scale, height and massing;
 - b. the experience of future and existing residents and users of the site;
 - c. the quality and character of the proposed development;
 - d. the character of the 24 places of Tower Hamlets, as set out in the council's Urban Structure and Characterisation Study;
 - e. the capacity for growth of the site, as set out in figure 9; and
 - f. robust community engagement and co-design from an early stage in the design process.

2. The council has determined design principles, indicative capacities, and appropriate heights for site allocations through a design-led approach. The council will support development proposals that conform to the requirements of site allocations.

3. Where a development proposal exceeds the capacity or height set out in a site allocation, the council will only support it where a further design-led approach can demonstrate that the proposal will be appropriate to the site and its context, is sustainably designed, and that there is sufficient infrastructure (either existing, planned, or to be delivered through the development) to support the proposed capacity.

4. The council will require certain development proposals to be accompanied by a site-specific infrastructure impact assessment to establish the additional requirements for infrastructure that will be created by the proposal, beyond what is planned for in the Local Plan, and how these requirements will be delivered. These assessments will be required for:

- a. proposals on site allocations which exceed the capacity or height set out in the allocation;
- b. proposals for 500 or more homes on unallocated sites; and
- c. proposals for tall buildings on unallocated sites that exceed the height limits set out in policy PS2.

5. The council will support development proposals to be accompanied by design codes, setting out clear design expectations for the site that respond to its surrounding context and reflecting effective community engagement in their preparation. On site allocations in multiple ownership, the council will support development proposals to be accompanied by a joint design code for the site, developed in collaboration between the different landowners.

Supporting text

14.6 Tower Hamlets is a small borough in geographical terms, so opportunities for development are limited. Thus, to meet our ambitious targets for good-quality housing, to address overcrowding, and to enable sustainable placemaking, an increase in density is generally supported across the borough. But this increase in density needs to have high-quality design as a key focus with the borough's housing needs in mind, and needs to be proportionate to the capacity of the borough to absorb the increase in terms of infrastructure (both social and physical) and the creation of positive places through elements such as townscape and multi-functional public realm in order to deliver successful and sustainable places.

14.7 This policy aims to ensure that new development is well-designed and proposes sustainable capacities and densities to create high-quality places for our residents to live. It incorporates the requirements of the new London Plan for all sites to optimise their capacity through a design-led process. This will help to ensure that new development creates attractive, liveable places that existing and future residents are proud to live in. The London Plan Guidance on Optimising Site Capacity makes clear that optimising site capacity does not mean maximising the density of a site. Instead, it means "responding to the existing character and distinctiveness of the surrounding context and balancing the capacity for growth, need for increased housing supply, and key factors such as access by walking, cycling and public transport, alongside an improved quality of life for Londoners. Capacity-testing should be the product of the design-led approach, and not the driver" (paragraph 1.1.1.).

14.8 In design terms, an increase in density will not always mean taller buildings are needed or appropriate. Increased density can be achieved in multiple ways, and in many cases a lower-rise form of density may be



the more appropriate option, while still providing a significant increase in housing or other uses. However, in other cases, the use of tall buildings may allow for greater density than could otherwise be achieved on smaller or otherwise constrained sites, thus allowing for a greater contribution towards meeting the borough's housing needs. A design-led approach to sites will allow us to determine this. See Policy PS2 for more details on the approach to tall buildings.

14.9 Part 1 sets out that proposals should follow a design-led approach in line with the London Plan and the National Design Guide. The National Design Guide says that "well-designed places and buildings come about when there is a clearly expressed 'story' for the design concept and how

it has evolved into a design proposal. This explains how the concept influences the layout, form, appearance, and details of the proposed development. It may draw its inspiration from the site, its surroundings, or a wider context" (paragraph 16). This is consistent with the approach to design-led development set out in London Plan policies D1, D2 and D3 and the council's expectation that proposals will demonstrate a clear rationale for their design.

14.10 Proposals should demonstrate that they have considered:

- The form and layout of the proposal – how does the layout, scale, and appearance of the building relate to the character of the area and existing and proposed street layouts? Are they aligned with people's patterns of movement in the area, and encourage further permeability and connectivity? Are the designs street-based, with clearly defined private and public spaces, and do they encourage active travel and enable people to feel safe around the space?
- Experience – does the proposal provide an attractive, welcoming space for residents, nearby communities, and others who may use the development or the surrounding public realm, including marginalised groups? Are there spaces for play, relaxation, social interaction and physical activity? Does the proposal promote community health and well-being? Does the proposal provide adequate privacy for residents, while also allowing for active frontages and a positive relationship between the inside and outside of the buildings to allow people to feel safe and comfortable using the space? Does the proposal reflect the needs of all members of the community, including families, larger households, and those who may inhabit the low cost rented units - both in terms of the quality of the homes



- themselves, but also in relation to the general layout of the building, and the public and private amenity spaces.
- Quality and character – is the development of high architectural quality, with attention paid to architectural details and materials, and consideration given to the potential uses of different spaces? Will the proposal be built to meet high sustainability standards, and to maximise green spaces and sustainably manage flood risks? Does the proposal identify valued features and characteristics of the surrounding area, and make a genuine attempt to contribute towards the positive aspects of the local character?

14.11 As part of this design-led approach, proposals should also take into account the specific character and capacity for growth of different areas of the borough, as set out in two evidence base documents.

14.12 The Urban Structure and Characterisation Study (2009, and a 2016 addendum) defined 24 specific 'places' or neighbourhoods within Tower Hamlets, and set out what makes those places unique. This study can provide a starting point for understanding how a development site fits within the wider context of its surrounding neighbourhood and can help to determine positive elements of local character that can be accentuated through new development.

14.13 The Characterisation and Growth Study (2023) takes a more granular approach and characterises the specific building typologies of small areas of the borough. It then assesses them for coherence, design quality, and sensitivity to change, and determines their capacity for growth – set out for each area as 'conserve', 'enhance', or 'transform', as shown on figure 9. The capacity for growth as set out in this document does not determine what development should be proposed on a site, and does not imply that there are areas where no development would be possible. Instead, it is a starting point for a design-led process, allowing for consideration of what would be the most appropriate form within each area.

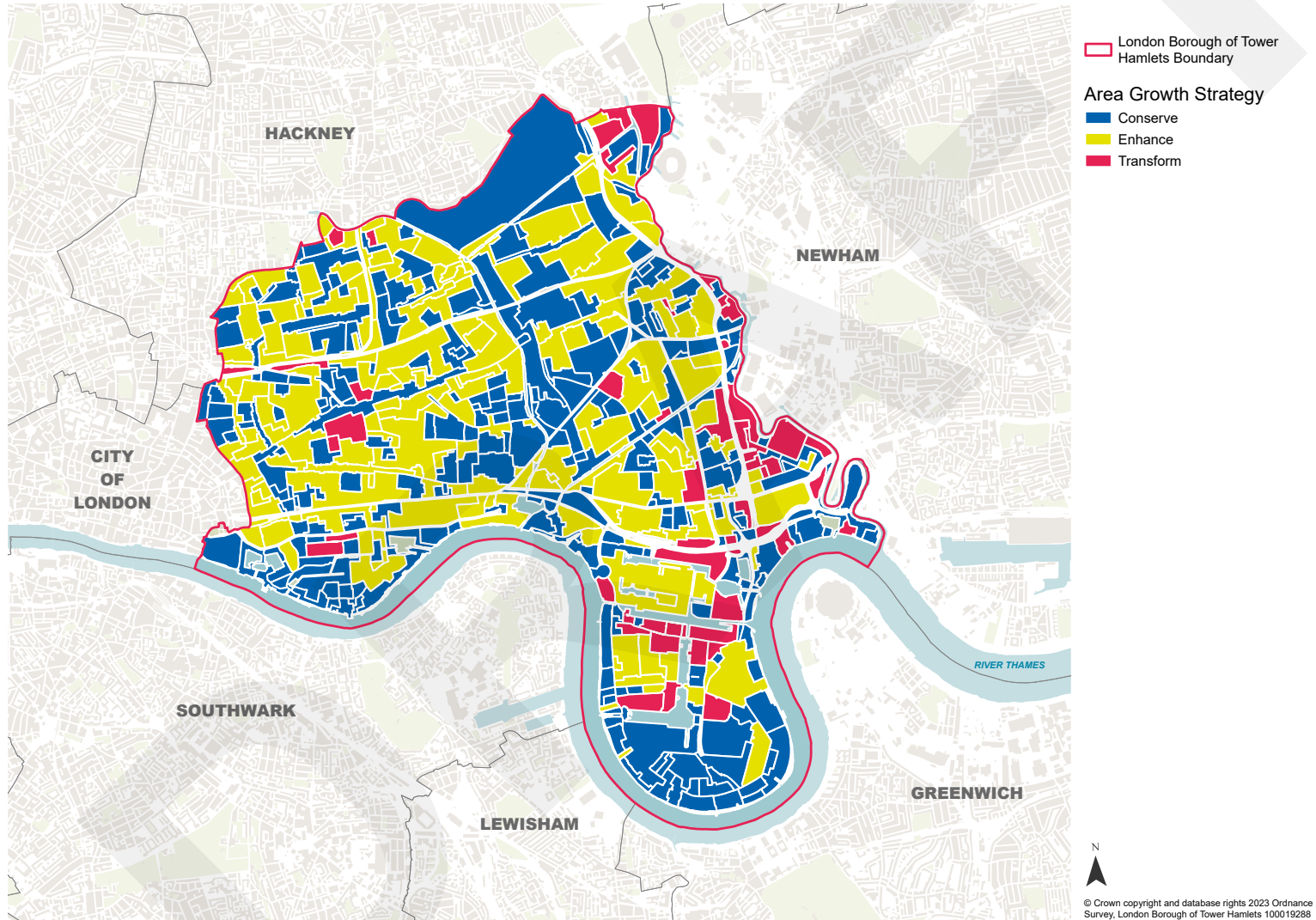
The three types of growth area can be understood as follows:

- 'Conserve' areas have consistently high quality and coherent character. This can include conservation areas, which are designated for their heritage significance, but can also include areas of more modern development which have a positive character. In these areas, change and growth can take place, but must be

undertaken sensitively to maintain the existing character and quality. Development coming forward in 'conserve' areas should draw on the predominant typology and architecture in the area and reflect this in its proposal. Materiality and detailing should reflect or positively respond to the local vernacular while development heights should normally closely resemble the prevailing height.

- 'Enhance' areas have mixed design quality and may be less coherent than 'conserve' areas. These areas offer potential for incremental change to enhance the overall character of the area. While there is an opportunity for new forms of design and architecture in these areas, any proposal should respect and draw on the special and valued features of the existing area. The height of a new development should be sensitive to the prevailing heights in the area, while also recognising the potential for increased heights on adjacent sites within 'transform' areas. There may be opportunities for a transition in height on appropriate sites and there is the opportunity for the materiality and detailing to reflect the local vernacular.
- 'Transform' areas are places where an opportunity exists to establish a new character, due to the poor quality of the existing character – many of these areas are vacant brownfield sites suitable for significant development. This may also offer the potential to intensify development both in respect of development floorspace and height. Many of these areas have been identified for change through regeneration area designations or site allocations. New development should both enhance positive elements where they exist and improve the physical character through placemaking to create attractive new places.

Figure 9: Growth areas in Tower Hamlets



14.14 Consultation, early engagement, and negotiation are all necessary key elements of a design-led approach and can help to ensure that the final proposals as submitted will be well-designed and supported by the community. Consultation with affected communities should take place at the earliest possible stage in the design process and should inform the design rather than only responding to proposals. Consultation with diverse and representative groups, including those with protected characteristics, is particularly important, to ensure these groups have their voices heard and their needs taken into account in the design process.

14.15 All strategic developments will be expected to be submitted to the Tower Hamlets Quality Review Panel as part of the design process, and this may be agreed as part of a Planning Performance Agreement. Some smaller proposals may also be referred to the panel, particularly in instances where there are concerns around elements of the design, or where they may have significant effects on heritage assets. Proposals are usually expected to be presented to the panel twice, once at pre-application stage and once at application stage, and applicants should be prepared to explain how the comments of the panel have been addressed.

14.16 Part 2 sets out how this process is to be followed on site allocations. The council has undertaken a high-level design-led site capacity assessment for allocated sites, which has led to an understanding of the design principles, indicative capacities and appropriate heights that will be considered suitable on allocated sites. Proposals that conform to these capacities and heights, and meet the other principles set out in the site allocations, will be supported.



14.17 It is recognised that multiple design options may be acceptable on a single site, so there may be alternative options that could potentially increase capacities. Part 3 sets out that this must be robustly justified through the design-led approach. Allocated site capacities are based on an understanding of available infrastructure capacity, so increases will need to be acceptable in design terms but also demonstrate that there will not be a negative effect on infrastructure capacity, or that such effects are mitigated through delivery of additional infrastructure through the development process.

14.18 Part 4 sets out the requirement for an assessment of the impacts on infrastructure as a result of the proposed development. The Local Plan and supporting evidence base, sets out the infrastructure to support the amount of development identified in the Plan over the period to 2038. Part 4 of this policy identifies circumstances that will increase the amount of development beyond what is planned for, and hence it is necessary for such proposals to identify how they will mitigate the additional impacts created. Infrastructure impact assessments are therefore required for allocated sites that exceed allocated capacities or heights, but also on unallocated sites that are delivering above the 500-home threshold used to assess site allocations. In addition, proposals for tall buildings outside of site allocations that are expected to exceed the height limits set out in policy PS2 will also be expected to submit infrastructure impact assessments.

14.19 Infrastructure impact assessments should demonstrate the expected impact of the development on the provision of local and strategic infrastructure, including but not limited to:

- education – early years, primary, secondary, and specialist;
- healthcare – primary care provision, adult social care provision;
- sports and leisure facilities – sports halls, swimming pools, pitches;
- publicly accessible open space;
- community presence facilities (i.e. Idea Stores);
- community facilities;
- youth facilities;
- energy infrastructure and utilities; and
- emergency services.



14.20 The infrastructure impact assessment should, in line with London Plan policy D2, "have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make". The infrastructure delivery plan is based on an assessment of expected densities of development within the borough during the lifetime of the plan, and developments that exceed these densities should therefore clearly highlight the additional impacts that increased density is likely to have on infrastructure requirements, and how the additional infrastructure needs that are created will be provided for. This should be determined in discussion with the council, and developers are encouraged to open such discussions at the earliest possible point in the

process. The council recognise that more development will likely equate to more CIL, however an infrastructure impact assessment should still consider costs as well as the wider context within which infrastructure is delivered, including land availability and affordability, location and accessibility, and deliverability. This may involve the consideration of delivery beyond the proposed scheme. In line with the London Plan Policy D2, "Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure".

14.21 Where infrastructure impacts have been considered in other submitted documents, such as environmental, transport, or utility assessments, this information should not be repeated, but instead referenced clearly in an infrastructure impact assessment. The infrastructure impact assessment document should focus on the resulting impacts and actions to be taken by the applicant to mitigate those impacts.

14.22 The NPPF encourages the creation of design codes by both local authorities and developers, and part 5 of this policy encourages the creation of such codes. In the case of strategic developments, which can have a significant impact on the local area, the development of design codes can support delivery of new development and encourage public support. They can also ensure that important design elements of a scheme are fully considered at an early stage of development. Some of the site allocations in this plan cover land that is owned by multiple parties, and in these cases a design code produced jointly between these different landowners can ensure that development comes forward in a coordinated manner and help to ensure that proposals on different parts of the allocations can be considered appropriate in design terms

and given permission. The development of design codes should be discussed with the council and should be subject to early engagement with local communities, to ensure that proposals are appropriate to the local context and can effectively support the delivery of new development.

London Plan policies:

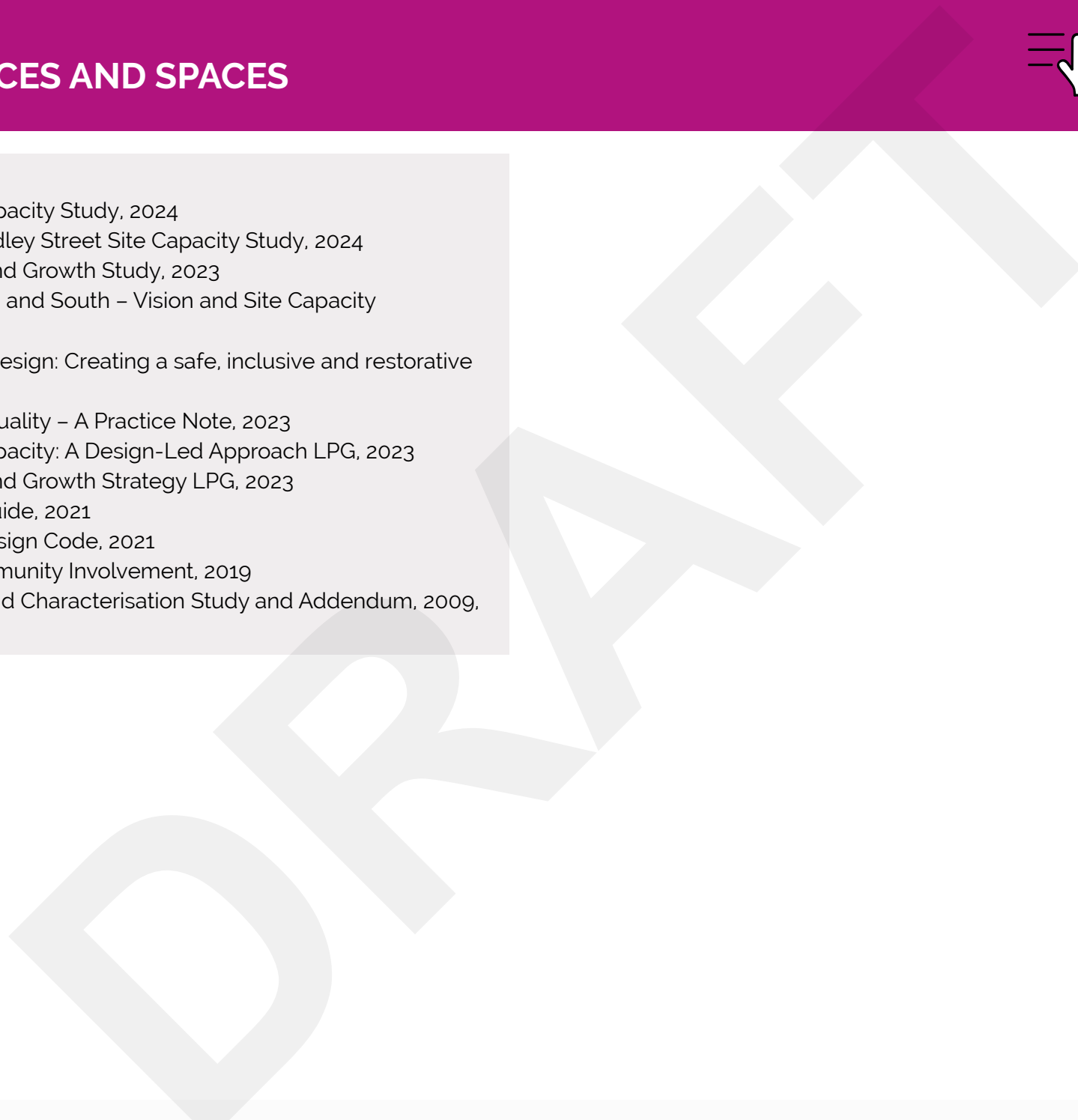
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D5 Inclusive design
- E11 Skills and opportunities for all

Local Plan policies:

- HF1 Meeting housing needs
- HF2 Affordable housing and housing mix
- HF4 Supported and specialist housing
- HF5 Gypsy and Traveller accommodation
- HF6 Purpose-built student accommodation
- HF7 Large-scale purpose built shared-living
- HF8 Housing with shared facilities (houses in multiple occupation)
- HF9 Housing standards and quality
- EG1 Creating investment and jobs
- TC1 Supporting the network and hierarchy of centres
- Cl1 Supporting community facilities
- BO1 Green and blue infrastructure
- MC1 Sustainable travel
- MC2 Active travel and healthy streets

Evidence base:

- Tower Hamlets Capacity Study, 2024
- Brick Lane and Pedley Street Site Capacity Study, 2024
- Characterisation and Growth Study, 2023
- Whitechapel North and South – Vision and Site Capacity Assessment, 2023
- Gender Inclusive Design: Creating a safe, inclusive and restorative borough, 2023
- Securing Design Quality – A Practice Note, 2023
- Optimising Site Capacity: A Design-Led Approach LPG, 2023
- Characterisation and Growth Strategy LPG, 2023
- National Design Guide, 2021
- National Model Design Code, 2021
- Statement of Community Involvement, 2019
- Urban Structure and Characterisation Study and Addendum, 2009, 2016



Policy PS2 Tall buildings

1. Within Tower Hamlets, a tall building is defined as one which is 30m or more in height measured as the height above ground level to the uppermost part of the structure.
2. Areas considered suitable for tall buildings are shown on the policies map and in figure 10, divided into zones A-F. Development of tall buildings will be supported within zones A-E, and in zone F where appropriate; and within site allocations, as set out in table 4 and within the site allocations chapter of this plan.
3. All proposals that include tall buildings must demonstrate how they provide significant public benefits; and residential proposals that include tall buildings must meet the affordable housing requirements set out in Policy HF2, including provision of 40% affordable housing, with 85% of that affordable housing delivered as social rented homes.
4. Proposed heights must take account of:
 - a. the need for variation in heights within a particular development proposal and across different development proposals within an area;
 - b. the need to avoid harm to the significance of heritage assets, areas of ecological importance, or the enjoyment of the borough's open spaces;
 - c. impacts on daylight, sunlight, and overshadowing for neighbouring land and developments;
 - d. the need to maintain sky views from street level from within clusters of tall buildings; and



- e. maximum heights within specific allocations or appropriate heights within tall building zones, as set out in table 4 and figure 10.
5. All proposals for tall buildings must demonstrate how they meet the following design criteria in order to deliver high-quality development:
 - a. promote the health and well-being of all residents and other users;
 - b. be of a height, scale, mass, volume, and orientation that is proportionate to their role, function and the importance of the

location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings;

- Page 742
- c. achieve exceptional architectural quality and innovative and sustainable building design, using robust, durable, attractive, and contextually appropriate materials throughout the building, and responding to the local character in the architectural language of the development;
 - d. enhance the character and distinctiveness of an area without adversely affecting designated townscapes and landscapes (including building/roof lines);
take account of, and avoid causing harm to the significance of, national or borough-designated landmarks, heritage assets, Conservation Areas, key views and other historic skylines, and their settings;
 - f. provide a positive contribution to the skyline during both the day and night time;
 - g. maintain adequate distance between buildings to ensure a high-quality ground floor experience and enhanced environment;
 - h. present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level;

- i. provide an adequate quantum of high-quality communal open space, play areas and public realm (where residential uses are proposed), and where appropriate provide shared facilities at the ground floor level to encourage social cohesion;
 - j. demonstrate that the development does not adversely impact on the microclimate and amenity of the application site and the surrounding area;
 - k. demonstrate consideration of public safety requirements as part of the overall design, including the provision of safe evacuation routes and two staircases;
 - l. comply with civil aviation requirements and not interfere to an unacceptable degree with telecommunications, television and radio transmission networks and river radar equipment;
 - m. not prejudice future development potential of adjacent/ neighbouring buildings or plots; and
 - n. within Source Protection Zones, consider the importance of managing risks to groundwater resources that could be caused by deep-piled foundations.
6. Proposals for tall buildings should consider incorporating public viewing galleries within the development where appropriate.
7. Proposals within designated tall building zones should apply the following principles, as part of ensuring appropriate development of the townscape of the borough:

Table 3: Tall building zone principles

Tall building zone	Principles
Zone A (Aldgate)	<p>This zone has a primarily office/commercial character.</p> <p>Building heights in this zone should step down towards the southern edge of this zone.</p> <p>An appropriate height for taller points in this zone is between 60-80m AOD. Appropriate heights on individual sites will be dependent upon the impact on heritage assets and their settings, including the protected view of the Tower of London from the Queen's Walk. Development must protect this view, and this may lead to a limitation of building heights on particular sites where this is necessary to preserve the view and the outstanding universal value of the Tower of London.</p>
Zone B (Canary Wharf)	<p>This zone has a primarily office/commercial character in the centre, with increasingly residential character at the western, eastern, and northern edges.</p> <p>Development within this zone will be expected to positively contribute to the skyline of strategic importance and maintain the iconic image and character of Canary Wharf as a world financial and business centre.</p> <p>The silhouette of the shoulder and distinctive 'pyramid' of One Canada Square should be preserved from the protected views set out on the policies map and in Policy PS8, and should also be considered from other non-designated views where appropriate.</p> <p>Building heights in this zone should step down from One Canada Square to support its central emphasis.</p> <p>The tallest point in this zone should be One Canada Square at 235m AOD. An appropriate height for the tallest point in this zone after One Canada Square is 225m.</p>
Zone C (Marsh Wall and Millwall Inner Dock)	<p>This zone has a primarily residential character.</p> <p>Building heights along Marsh Wall should step down from the Canary Wharf TBZ to support its central emphasis</p> <p>Building heights should step down further from Marsh Wall and ensure that the integrity of the Canary Wharf TBZ is retained on the skyline when seen from places and bridges along the River Thames across Greater London, particularly in views identified in Policy PS8.</p> <p>Building heights should be consistent with the protection of London View Management Framework views, particularly those from Greenwich and the setting of Tower Bridge.</p> <p>The silhouette and distinctive 'pyramid' of One Canada Square should be preserved from the protected views set out on the policies map and in Policy PS8, and should also be considered from other non-designated views where appropriate.</p> <p>An appropriate height for the tallest new developments in this zone is 180m AOD.</p>

Tall building zone	Principles
Zone D (Blackwall)	<p>This zone is of mixed residential/commercial character.</p> <p>This zone should remain lower in height and separated from the nearby Canary Wharf zone.</p> <p>Development heights should step down towards the western, northern, and eastern edges of this zone, and buildings should be of varying heights allowing sky views between them when viewed from the river or the Greenwich peninsula.</p> <p>An appropriate height for the tallest point in this zone is 130m AOD.</p>
Zone E (Leamouth)	<p>This zone has a primarily residential character.</p> <p>Tall buildings in this zone should respect the primacy of the Canary Wharf zone, and step down towards the River Thames and the East India Dock Basin and ensure glimpses and views across the zone.</p> <p>An appropriate height for the tallest point in this zone is 90m AOD.</p>
<p>Zone F</p> <p>Page 744</p>	<p>This zone consists of all areas suitable for tall buildings that do not fall within zones A to E. This zone has a mixed character, with variations across different neighbourhoods.</p> <p>Tall buildings in this area should show a variation in height to create a varied and interesting townscape, and should respond sensitively to the surrounding context.</p> <p>In locations where this zone is adjacent to zones A to E, heights within this zone should respond to the principles set out for zones A to E above, including through an appropriate step-down in height from adjacent developments.</p> <p>The tallest points should cluster around rail transport stations and within town centres.</p> <p>Buildings and clusters of buildings within this zone should not undermine the prominence of tall building zones A to E as the principal points of height in the borough.</p> <p>An appropriate height for the tallest points in this zone is 70m AOD.</p>
Site Allocations	<p>Proposals within site allocations should apply the design principles set out in the respective allocations in Section 4 of this plan.</p> <p>Height for new development should not exceed the heights set out in the allocations and in table 4.</p>

8. Proposals that are within a Tall Building Zone but adjacent to an area that is not suitable for tall buildings should demonstrate careful consideration of heritage concerns and how to appropriately transition between greater and lesser heights without undermining the significance of the borough's heritage assets or publicly accessible open spaces.

Supporting text

14.23 This policy seeks to guide and manage the location, scale, and development of tall buildings in the borough in line with the requirements of the London Plan. In recent years, Tower Hamlets has consistently been one of the London boroughs with the largest pipeline of tall buildings under development, and with some of the tallest buildings in London. The significant amount of tall buildings being planned and constructed in the borough are important contributors to meeting high housing targets, and can also make an important contribution to affordable housing. However, tall buildings can also bring negative impacts for residents if poorly designed, such as creating poor microclimates with excessive wind, shadowing, or overheating, which can create unhealthy and dangerous places to live. For example, research undertaken for the High Density Living SPD found that 35% of residents living in the areas around high-density schemes including tall buildings felt that the buildings blocked sunlight to their homes; 40% of residents in high-density schemes said their homes overheated in the summer, and those living above the 20th floor were less comfortable opening their windows to help cool rooms down; and 34% of residents surveyed felt that high-density developments were damaging their privacy. The negative impacts of poorly designed tall buildings can also affect the wider area and detract from the iconic skylines of the borough or damage the significance of heritage assets. Therefore, it is important that the council ensures that tall buildings which come forward are of the highest possible quality and make a positive contribution to the borough, in order to ensure that we deliver the high-quality housing that is needed to meet our ambitions for providing homes and addressing overcrowding.

14.24 This policy takes a new approach to tall buildings from that previously implemented in Tower Hamlets. Under this plan, greater



height will be considered in a wider range of locations across the borough, with the additional density provided by these developments balanced out by a correspondingly greater level of affordable housing delivery. Important locations, such as conservation areas and nature sites, will still be protected from the potential negative impacts of taller buildings, but a greater level of height and densification will be considered in less sensitive areas of the borough, and should be focused around locations with high levels of accessibility to transport, shops, and other facilities.

14.25 Part 1 sets out a definition of tall buildings in Tower Hamlets, which is 30m height above ground level to the uppermost part of the structure,

including any plant or antennae. Sites that are below this height will not need to show consideration of the rest of the tall buildings policy, though they will have to comply with all remaining design policies in the Local Plan. Sites that are above this height will need to meet the remaining requirements of this policy, even when they are in locations identified as suitable for tall buildings under part 2 of the policy. When stating the height of a tall building as part of an application, in addition to the storey height, this should be described in metres and the height above ordnance datum (AOD).

14.26 Part 2 sets out the council's approach to the locations of tall buildings. Due to the exceptional need for affordable housing in the borough, and the ability of tall buildings to increase density and therefore increase the amount of affordable housing delivered, the council considers that there should be a relatively permissive approach to tall buildings in Tower Hamlets. Conservation areas, listed buildings, protected view corridors, and open spaces (where development would generally not be allowed anyway) are considered to be the only locations that are not acceptable on principle for tall buildings of some form. Proposals for tall buildings in these areas will not be supported. However, the rest of the borough is considered to be suitable for tall buildings of various heights. These tall building areas can be understood as falling into three categories:

- Site allocations – these are specific locations where the potential for significant development has been identified. The details of site allocations are set out in section 4 of this plan and include design principles and maximum acceptable heights. These maximum acceptable heights will vary from site to site, depending on location

and context. All site allocations are expected to be able to deliver at least 500 new homes, and in some cases much more than this.

- Tall building zones A-E – these are the locations in the borough that are most appropriate for the tallest buildings. These areas already contain clusters of tall buildings, and in many cases contain other tall buildings under construction or with planning permission.
- Tall building zone F – this consists of the remaining areas of the borough that are considered suitable for tall buildings. By its nature, this area is geographically diffuse, including areas with a variety of different characters from town centres through to purely residential areas. Given the existing character of these areas, while they are considered suitable for some additional height, they should not be the locations for the tallest buildings in the borough, which should be concentrated in zones A-E.

14.27 The tall buildings zones are set out in figure 10 below. Appropriate heights for the tallest points- within each zone, and maximum heights within the site allocations, are set out in table 4 below. Further principles for the development of these different zones are set out in part 6 of the policy.

Figure 10: Tall building zones, site allocations, and restricted areas for height

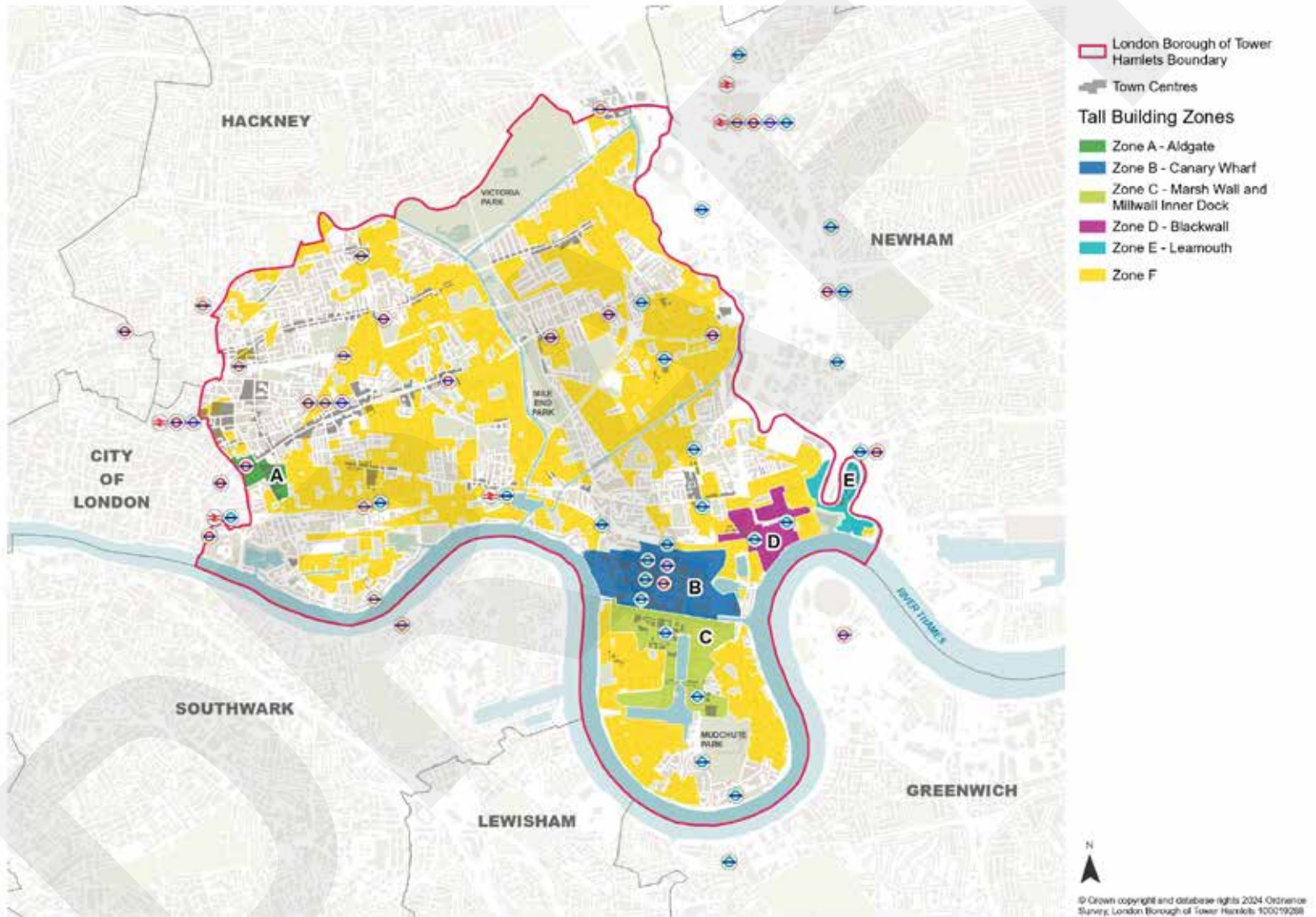


Table 4: Maximum heights in tall building zones and site allocations

Site allocation or tall building zone	Maximum height for new development
1.1 Bishopsgate Goods Yard	105m AOD (Tower Hamlets side)
1.2 London Dock	89m AOD
1.3 Marian Place Gasworks	57m AOD
1.4 Whitechapel South	88m AOD
1.5 London Metropolitan University	63m AOD
1.6 Whitechapel North	52m AOD
1.7 Brick Lane and Pedley Street	70m AOD
2.1 Bow Common Lane	89m AOD
2.2 Chrisp Street	88m AOD
3.1 Ailsa Street	80m AOD
3.2 Leven Road	76m AOD
3.3 Aberfeldy Estate	80m AOD
3.4 Bromley-by-Bow	50m AOD
3.5 Blackwall Trading Estate and Leamouth Road Depot	71m AOD
3.6 Hackney Wick Station	43m AOD
3.7 Hepscott Road	32m AOD
3.9 Sweetwater	36m AOD
3.10 Teviot Estate	50m AOD
4.1 Aspen Way	91m AOD
4.2 Billingsgate Market	181m AOD

Site allocation or tall building zone	Maximum height for new development
4.3 Crossharbour	115m AOD
4.4 Limeharbour	167m AOD
4.5 Marsh Wall East	182m AOD
4.6 Marsh Wall West	230m AOD
4.8 Millharbour	146m AOD
4.9 North Quay	225m AOD
4.10 Reuters	139m AOD
4.11 Riverside South	186m AOD
4.12 Westferry Printworks	110m AOD
4.13 Wood Wharf	211m AOD
4.14 10 Bank Street	166m AOD
4.17 Westferry and Park Place	132m AOD
Tall Building Zones	Appropriate height for tallest point in the zone
Tall building zone A – Aldgate	80m AOD
Tall building zone B – Canary Wharf	225m AOD
Tall building zone C – Marsh Wall and Millwall Inner Dock	180m AOD
Tall building zone D – Blackwall	130m AOD
Tall building zone E – Leamouth	90m AOD
Tall building zone F	70m AOD

14.28 Part 3 requires all tall building proposals, even when they are located within areas that have been identified as potentially suitable for tall buildings, to demonstrate how they provide significant public benefits to justify their development. Tall buildings and increased densities can be positive things, but they are not inherently so – they have to be accompanied by the public benefits that denser, taller buildings can unlock. The design criteria in this policy set out the circumstances in which tall buildings will be considered acceptable from a design perspective, but to be considered acceptable in the overall planning balance, where the potential negative impacts of taller buildings are considered against the benefits they bring, they must provide a significant proportion of the affordable housing that the borough so urgently needs. To that end, to be considered acceptable, tall building proposals must meet or exceed the 40% affordable housing target for the borough, and provide a suitable mix of unit sizes, including family homes, to meet the identified needs of the borough. In relation to affordable housing, proposals should also meet the tenure mix requiring 85% social rented housing and 15% intermediate housing. Proposals for tall buildings that do not meet this threshold will not be supported. For more details on affordable housing requirements, refer to policy HF2 – affordable housing and housing mix.

14.29 This policy sets out appropriate heights for tall buildings across the borough. However, precise heights will still need to be considered on a site-by-site basis, and each proposal will be assessed on its own merits – in some places within a Tall Building Zone it may be possible to build up to the highest appropriate height, but in other places a lower height may be required for a number of reasons (including, but not limited to, elements such as microclimate, daylight/sunlight impacts, heritage impacts, and townscape impacts).

14.30 In all cases, the height that is proposed on a particular site should be the one that is demonstrated by a design-led process to be the most appropriate for the context. Part 4 of this policy sets out the criteria that should be considered when determining height on particular sites. Proposals should also consider the specific tall building zone principles in part 6 of the policy.

14.31 Tall buildings should vary in height, so as to not present a 'wall' of development, and to avoid negative impacts on daylight, sunlight, overlooking, and microclimates. Tall buildings within a group should be carefully positioned so that sky views can be experienced from street level and so that tall buildings do not have an overbearing impact on streets and spaces within the area.

14.32 Part 5 sets out a number of design criteria against which tall building proposals will be assessed. This is to ensure that when tall buildings are built, they are well-designed and make a positive contribution to both the directly surrounding context and public realm in which they are located, but also the wider townscape and skyline of the borough. Tall buildings should be designed in a way that promotes the health and well-being of all their residents, as well as those who live in the surrounding area, including through careful consideration of accessibility for people with disabilities and gender-inclusive design. The High Density Living SPD identifies a number of health and well-being concerns with high-density developments (which often, though not always, will include tall buildings) relating to space for children to play and socialise, sense of community, adequate space for domestic tasks, home working, and keeping pets, a lack of flexibility and storage space in layouts, and problems relating to daylight, overheating, privacy, noise, and wind. However, while poorly-designed tall buildings can exacerbate these problems, well-designed tall buildings can provide high-quality

housing that encourages health and well-being. The High Density Living SPD suggests a range of interventions that can ensure tall buildings achieve this.

14.33 The criteria will guide the visual and contextual development of tall buildings in the borough. In order to enable assessment against the criteria, proposals should be accompanied by accurate visual representations within the design and access statement showing the impacts of the proposal in near, middle and distant views, including the public realm and its appearance at street level. The views to be included should be discussed as part of the pre-application process. Major and strategic development proposals should be accompanied by a 3D model of the proposed development in a format compatible with the council's IT systems, ideally provided at pre-application process as well as application stage, to allow officers to assess potential viewpoints.

14.34 Due to their visual prominence, it is important that tall buildings are of exceptional architectural quality, as expressed in part 5(c). New tall buildings should significantly enhance their immediate setting, and be sensitive to the defining characteristics of the local area. Visually prominent plant, building maintenance units (BMU) and/or antennae at the top of a building will not be acceptable and should be appropriately concealed as part of the architectural design.

14.35 Tall buildings should be designed to express elegance, proportionality, and verticality in a form that is consistent from every angle. To that end, generally slab blocks and bulky forms should be avoided.

14.36 The choice of facing materials is important to assist in visually weaving a new building into its established surroundings or, where appropriate, provide a contrast. Design should draw on local character

and distinctiveness when selecting materials and help reinforce the identity and sense of place within an area. The choice of materials needs to be carefully tested through 3D modelling and visualisations to fully understand their impact. Consideration should be given as to how design detailing is perceived from close up, and middle and long distance views. Materials should be durable and offer longevity, and should be fully justified in relation to the typical palette of materials and colours used in its location. Bright colours and tones that are visually prominent should generally be avoided on tall buildings, particularly within the setting of sensitive heritage assets or when visible in sensitive views.

14.37 Tall buildings house large numbers of people and can support a range of activities, including the provision of amenity areas (e.g. private, communal and public spaces) and active uses. In the majority of cases, tall buildings are communities in their own right given the number of inhabitants they have. In relation to part 5(i), where they are residential, tall buildings should deliver appropriate quantities of high-quality amenity and play space for tenants and occupants. Communal open spaces and children's play space should typically be at the centre of the development and be well-overlooked. Spaces should be accessible for those who require level access, and should be oriented to maximise sunlight and daylight. Communal spaces should establish platforms for interactions between users to support a sense of belonging. Ground floors of tall buildings, where possible, should introduce uses which would benefit the wider neighbourhood. Tall buildings should also foster social cohesion and support integration between local communities.

14.38 Further guidance on how to achieve good design for social interaction in high density environments can be found in the Tower Hamlets High Density Living SPD.

14.39 In relation to part 5(j), proposals involving tall buildings will need to demonstrate how any adverse impacts on the microclimate will be mitigated in relation to wind, overshadowing, daylight and sunlight, solar glare, and light pollution. Buildings over 25 metres in height and/ or substantially taller than surrounding buildings must be tested against the following amended Lawson criteria in relation to wind.

Table 5: Amended Lawson criteria for wind testing

Category	Mean and gust equivalent mean (GEM) wind speed (5% exceedance)	Description
Frequent sitting	2.5m/s	Acceptable for frequent outdoor sitting use, e.g. restaurant, café.
Occasional sitting	4m/s	Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies/terraces intended for occasional use, etc.
Standing	6m/s	Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
Walking	8m/s	Acceptable for external pavements, walkways.
Uncomfortable	>8m/s	Not comfortable for regular pedestrian access.

14.40 Strong winds are to be assessed as exceedances of 15m/s, and are to be mitigated to safe levels.

14.41 The testing of the following scenarios will be required as part of the planning application:

- baseline (i.e. the situation at the time of submission);
- the proposed development without mitigation/landscaping;
- the proposed development with surrounding cumulative developments without mitigation/landscaping;
- the proposed development with the inclusion of mitigation/landscaping; and
- the proposed development with surrounding cumulative developments with the inclusion of mitigation/landscaping.

14.42 Specific details on the required mitigation measures must be provided, including where and how these measures will be implemented. It must be ensured that all mitigation measures and landscaping proposed and tested in the wind microclimate assessment are proposed within the relevant planning documents, including the landscaping strategy.

14.43 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.

14.44 In relation to part 5(k), all buildings of 18m or more in height will be expected to provide at least two staircases as part of improved fire safety measures. This is in line with expected changes to the building regulations.

14.45 In relation to part 5(l), proposals involving buildings 90 metres in height or greater must be referred to the Civil Aviation Authority and London City Airport to ensure they will not be a potential hazard to aviation safety and navigation, in view of the proximity to London City Airport.

14.46 Part 5(m) relates to situations in which the delivery of tall buildings on one site could potentially harm the delivery of a similar level of density on an adjacent site if development on the first site is delivered badly. This can particularly be the case where buildings are proposed right against the boundary line of a plot, which could make it difficult for adjacent plots to achieve Local Plan requirements relating to privacy, overlooking, and daylight and sunlight.

14.47 The criteria set out in part 5 also apply to the redevelopment of existing tall buildings (including those outside the tall building zones). The presence of an existing tall building on the site will not in itself be regarded as justification for replacing it with another tall building – all proposals for tall buildings will need to be justified with reference to this policy and other policies that make up the development plan.

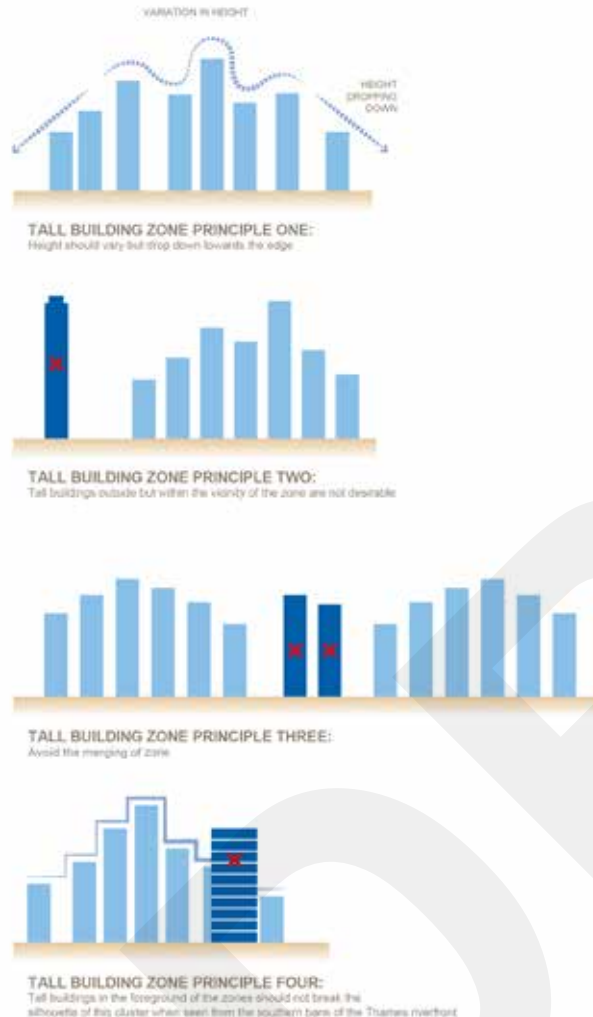
14.48 Part 6 of the policy sets out the requirement to consider the incorporation of public viewing galleries within tall building developments. Such arrangements should be made free to enter and publicly accessible. Such galleries should typically be located at the top of the building to afford wider views across London. This would support Part D of London Plan Policy D9 and provide greater opportunities to appreciate London's skyline from different parts of the borough.

14.49 Part 7 sets out specific principles for the tall building zones in the borough. Within these zones, tall buildings will be considered acceptable in principle, but it is still necessary to have some principles for how they are delivered, to ensure that clusters of tall buildings work harmoniously together, present a positive image of the borough, and do not have negative impacts in terms of microclimate, daylight/sunlight, heritage, or townscape. These principles will allow the council to assess proposals within the tall building zones and determine whether they are of appropriate height within the context.

14.50 The height of tall buildings within a zone should reflect the role and function of the zone. Zones A to E are considered to be the principal points of height within the borough, and these zones are where the tallest buildings in the borough will be delivered. Within these zones, normally the tallest elements should be located towards the centre of the zone, which should mark a particular feature or location.

14.51 Development will be required to step down towards the edges of the tall building zones. Variations in height will be encouraged to create a more dynamic skyline. Figure 11 demonstrates principles for the tall building zones that should be considered as part of the design-led process for proposals within tall building zones.

Figure 11: General tall building zone principles



14.52 Within the Canary Wharf Tall Building Zone (TBZ) (zone B) and surrounding zones, a key principle is to preserve views of the silhouette of One Canada Square, which is particularly defined by the 'pyramid' on the roof, and the 'shoulder' of the building beneath it. This is a very distinctive building within the context of Tower Hamlets, and also provides a clear central focus to the zone which can be used to ensure that the rest of the skyline of strategic importance develops appropriately. It is acknowledged that from some viewpoints, One Canada Square is obscured by surrounding development – however, this will not be taken as a precedent for further obscuration of this landmark on the skyline. To protect the silhouette of One Canada Square, surrounding buildings should step down in height within this zone, and surrounding zones should step down from the general height of the Canary Wharf zone.

14.53 Zone F represents a much more geographically diffuse and varied area than zones A to E. This zone illustrates the principle that much of the borough is suitable for relatively tall buildings, especially where these deliver public benefits including affordable housing. To this end, the zone contains all the character areas identified in the Characterisation and Growth Study which are not already within Tall Building Zones A to E or within site allocations, and which are not disqualified by means of being located within Conservation Areas, protected viewpoints, or nature or open space designations. However, to ensure the primacy of zones A to E and to ensure that very tall individual buildings are not brought forward on inappropriate sites far away from existing clusters, heights within this zone should be limited to 70m maximum, and the tallest buildings within the zones should form clusters around rail transport stations or be located within town centres, where the higher level of accessibility to public transports, shops, and

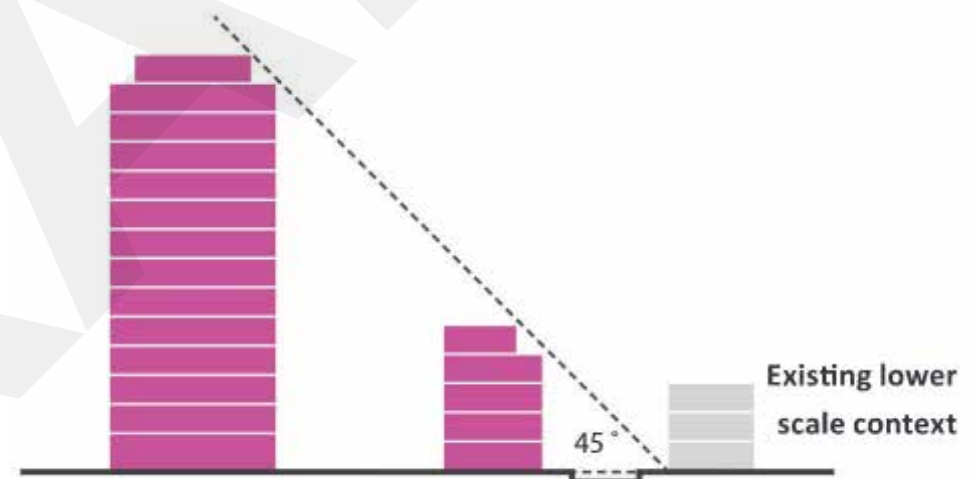
services can better accommodate higher densities. The threshold of 70m has been selected as this is the definition of a tall building in the City of London, which is adjacent to Tower Hamlets. By limiting heights to this level, we can gradually and sustainably increase the density of Tower Hamlets while respecting the context of heights in the City. Locating taller buildings in these areas can aid legibility, helping people find their way to town centres and transport hubs.

14.54 Site allocations are also considered to be areas suitable for tall buildings, and specific heights and design principles for tall buildings within site allocations are set out in more detail in section 4 of this plan.

14.55 Part 8 highlights the extra consideration that is required where areas that are suitable for tall buildings meet areas that are not suitable. In these areas there are likely to be particular heritage concerns that may necessitate lower building heights in order to avoid harm to heritage assets. The council has a statutory duty to pay special attention to protecting listed buildings and preserving or enhancing the character of conservation areas, and tall buildings may be harmful to the character or appearance of conservation areas in situations where modest building heights, consistent rooflines, or an open street scene form part of that special character. In some instances, taller buildings may cause harm by disrupting important views, overpowering areas of lower rise character with historic significance, or causing unacceptable harm to the setting of a conservation area or listed building. The cumulative impact of development on open spaces will also need to be considered in some instances, to ensure that open spaces remain attractive and enjoyable for residents and are not permanently in shadow. Heights in these locations may be expected to 'step up' more gradually from the non-tall building areas to reduce harm. As a frame of reference for appropriate

heights in locations where tall buildings may be placed in close proximity to areas of lower height, an angular plane of 45 degrees should be measured from surrounding properties in the lower height area to determine appropriate heights above which new development should not extend (though there may be further issues relating to heritage impacts that necessitate lower heights even than this).

Figure 12: Example of 45 degree angular plane taken from existing lower scale context



14.56 The heights of buildings within the area suitable for tall buildings will not be taken as a precedent to justify tall buildings within the area not considered suitable for tall buildings.

London Plan policies:

- D3 Optimising site capacity through the design-led approach
- D9 Tall buildings
- D12 Fire safety

Local Plan policies:

- HF2 Affordable housing and housing mix
- HF9 Housing standards and quality
- BO2 Open spaces and the green grid network
- BO3 Water spaces
- BO6 Play and recreation spaces

Evidence base:

- Views and Landmarks Study, 2024
- Characterisation and Growth Study, 2023
- Historic England Advice Note 4: Tall Buildings, 2022
- Fire Safety LPG – Consultation Draft, 2022
- Tall Buildings SPD Evidence Base Report, 2021
- High Density Living SPD, 2020
- Character and Context SPG, 2014
- Urban Structure and Characterisation Study and Addendum, 2009, 2016
- Conservation Area Character Appraisals and Management Guidelines



Policy PS3 Securing design quality

1. Development is required to meet the highest standards of design, layout and construction which promotes health and well-being and respects and positively responds to the context, townscape, landscape, public realm, and the needs of the community at different spatial scales. To achieve this, development must:

- a. be of an appropriate scale, height, mass, orientation, bulk, layout, and form in its site and context;
- b. integrate positively with existing development in the surrounding area, including having regard to the existing urban grain and established plot division;
- c. provide coherent building lines, roof lines and setbacks, complement streetscape rhythm and associated landscapes (including boundary treatments) and ensure optimal plot coverages to avoid over-development;
- d. ensure that the architectural language – scale, composition and articulation of building form, design of detailing, elements and materials applied on elevations – complements and enhances the immediate and wider surroundings;
- e. use high-quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development;
- f. consider the use of colour to respond contextually to the character of surrounding areas and improve legibility;

- g. ensure that buildings are designed and laid out in such a way as to be adaptable and accessible for potential future uses and users;
- h. ensure that the health and wellbeing of all users, particularly vulnerable people, is considered throughout the design process;
- i. use design and construction techniques to ensure that the development does not result in unacceptably harmful impacts arising from overheating, wind, air pollution, light pollution noise pollution, or unacceptable odours whilst optimising energy and waste efficiency;
- j. provide a mix and range of communal and publicly accessible open spaces and water spaces, and enhanced connectivity to existing open and water space;
- k. maintain privacy for residents within habitable rooms (including residents of existing nearby buildings) and avoid overlooking where possible, or an unacceptable increase in the sense of enclosure;
- l. ensure new and existing habitable rooms have an acceptable outlook, and maximise dual aspect units;
- m. ensure new and existing habitable rooms provide an acceptable level of ventilation;
- n. seek to maximise levels of daylight and sunlight in new residential developments and ensure adequate levels of daylight and sunlight for new residential occupiers in habitable rooms and in amenity spaces within the development;

- o. not result in an unacceptable material deterioration of the sunlight and daylight conditions in habitable rooms of surrounding development and not resulting in an unacceptable level of overshadowing to surrounding open space and private outdoor space;
 - p. not create unacceptable levels of artificial light, odour, noise, fumes, vibrations, or dust pollution during the life of the development; and
 - q. consider implementing suicide prevention safety measures where necessary and where they can be feasibly and appropriately incorporated into the design of the building.
2. Development with a density of 1,100 habitable rooms per hectare or more must demonstrate how it has considered the requirements of the Tower Hamlets High Density Living SPD in the design of the proposal.
3. The council will require the use of planning conditions or planning obligations to ensure that the design quality of applications is carried through to the final delivery of a development.

Supporting text

14.57 This policy sets out the general design criteria against which all new development will be assessed. The purpose of this policy is to outline the key elements of high-quality design so that new development creates buildings, spaces and places that are sustainable, accessible, attractive, durable, and well-integrated into their surroundings and that are responsive to the character of the area, thus contributing to a better quality of life for residents.

14.58 The experience of the urban environment is collective and cumulative, and even small elements of poor design can significantly detract from how we experience, understand, and value a place. Good design, on the other hand, can contribute positively to the health and well-being of residents and the wider community. Therefore, all development will be expected to meet the highest possible standard of design.

14.59 Policy PS1 requires a design-led approach to new development and Policy PS3 complements this strategic approach to design by detailing some of the specific elements of good design that should be considered. This policy does not exhaust everything that should be considered as part of that design-led process, and in particular a design-led process will also be heavily influenced by engagement and consultation with the community – but the requirements of this policy will help to ensure that the design-led process is successful.

14.60 Parts 1(a) to (j) sets out requirements to ensure that new development is of an appropriate design, layout, and construction to create sustainable and adaptable new communities. The design, siting and layout of new development should be considered in the wider context and be sensitive to the existing character and identity of the area. This does not require proposals for new development to copy

surrounding buildings – imaginative and innovative interpretations of the local context can be the starting point for high-quality architecture and can contribute positively to the character of a neighbourhood, but only where they have been carefully considered, refined, and consulted on to ensure that they respond to the needs of the community.

14.61 New development should be well-integrated with existing development in the surrounding area (part 1(b)). This can be related to the physical characteristics of buildings, such as materials and form, but can just as importantly be related to the social elements of design. It is important that new development does not 'turn its back on' existing communities and create a feeling of exclusivity or separateness. New development should be seen and felt to benefit and contribute to existing communities, rather than to stand apart from them or to feel like an imposition on existing communities.

14.62 With regard to roof lines (part 1(c)), plant should ideally be located below ground rather than on the roof. However, where provided on the roof, it should be fully integrated into the form and design of the roof to avoid compromising the appearance of the building, including the profile and appearance from neighbouring buildings and in long views.

14.63 Ground floors should be designed with a finer level of architectural detailing to ensure their legibility from street level; and on larger scale buildings, architectural detail should be sufficiently pronounced to remain readable features from a distance (part 1(d)).

14.64 In line with the policies in the Clean and Green Future chapter of this Plan, it is important that the design of new development takes account of the need to mitigate and adapt to climate change. This should include the use of materials that are robust and long-lasting and which also have the potential to be reused in line with circular economy

principles (part 1(e)); and consideration of how to use the orientation of buildings and external shading features such as overhangs, recesses, Louvres or brise soleil to control the temperature of indoor spaces and avoid overheating without the use of energy-intensive air conditioning systems.

14.65 Planning applications (including temporary permissions) will need to include technical information regarding materials, detailing, and finishes to demonstrate their longevity, quality and relationship to the local context.

14.66 Buildings and spaces should be designed to be adaptable and flexible from the outset, enabling them to respond to the changing needs and lifestyles of the occupier and allow for a variety of uses over time (part 1(g)).

14.67 The health and wellbeing of all users (part 1(h)), particularly vulnerable people, should be considered throughout the design process, and opportunities to promote health equity through design should be explored. Policy DV3 on healthy communities looks at this requirement in more detail.

14.68 Communal amenity space (part 1(j)) should be shared by all housing tenures – if it is not possible to make all amenity space shared, the majority of it should be. Amenity space should be spread throughout the development to avoid the burden of it falling on one tenure.

14.69 Amenity space should be easily accessible from residential entrances and should be well overlooked. The primary communal amenity space in a development should be located outdoors. Part of the communal amenity space should promote physical activity such as outdoor gyms or gardening, and part should encourage rest and relaxation.

14.70 Parts 1(k) to (p) set out requirements relating to residential amenity. For the purposes of these parts, a habitable room is defined as a room within a dwelling, the primary use of which is for living, sleeping, or dining. This definition includes living rooms, dining rooms, bedrooms, studies, home offices, and conservatories but excludes halls, corridors, bathrooms, and lavatories. Kitchens which provide space for dining and have windows will be considered habitable rooms and should be included in the assessment of amenity impacts.

14.71 Part 1(k) of the policy seeks to ensure there is sufficient privacy and no unreasonable loss of amenity from overlooking between habitable rooms of adjacent residential properties, or onto schools and other community facilities (e.g. health centres) or private open spaces. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. However, a distance of approximately 18 metres between windows of habitable rooms reduces inter-visibility to a degree acceptable to most people. This figure will be applied as a guideline depending upon the design and layout of the development.

14.72 For the purposes of part 1(l), outlook is defined as the visual amenity enjoyed by occupants when looking out of their windows or from their garden. To achieve acceptable outlooks, single aspect dwellings should be avoided – in line with the London Plan Guidance on Housing Design Standards, homes are expected to be at least dual aspect unless there are exceptional circumstances which make this impractical or undesirable. The definition of a dual aspect unit will be that used in Appendix 3 of the Housing Design Standards LPG – this means that “the provision of bay windows, stepped frontage, shallow recesses, or projecting facades does not constitute dual aspect”. If dwellings overlook bin stores, then screening and landscaping should be used to limit the impact.

14.73 Part 1(n) seeks to ensure that the design of new development optimises the levels of daylight and sunlight. Part 1(o) seeks to ensure that new developments minimise the impact of the loss of daylight and sunlight and unacceptable overshadowing (including on amenity space and public open space). A sunlight and daylight assessment must accompany all major planning applications and smaller schemes where adverse effects on daylight and sunlight levels are anticipated. It should follow the methodology set out in the most recent version of Building Research Establishment’s Site Layout Planning for Daylight and Sunlight guidance and the British Standard Code of Practice for daylighting, the results of which must be submitted with the planning application. Daylight and sunlight assessments should also include consideration of the potential redevelopment of adjacent sites, so as not to prejudice their redevelopment.

14.74 Part 1(p) seeks to ensure that artificial lighting is well-designed and uses appropriate light levels. For the purpose of this policy, light pollution is defined as the adverse effect of artificial lighting and includes glare, light spillage and sky glow. Odour and fumes from commercial developments can also have an adverse impact on the amenity of surrounding residents. Development proposals should refer to the most up-to-date guidance and best practice on the control of odours and noise from commercial kitchen exhaust systems.

14.75 Part 1(q) encourages consideration of suicide prevention safety measures where this is necessary – for instance, to reduce the risk of suicide from falling. This could involve the installation of physical barriers, but also the use of creative design to achieve outcomes such as the reduction of fall height. Areas with an identifiable suicide risk could also benefit from the installation of signage promoting support services. Applicants are encouraged to discuss this with the council at the earliest opportunity, to better understand how such measures can

be sensitively incorporated into the design of the development.

14.76 Further guidance on a successful design approach can be found in supplementary guidance, in particular the Tower Hamlets High Density Living SPD. Part 2 of the policy specifies that this document must be considered as part of any proposal with a density of 1,100 habitable rooms per hectare or above. However, developments that are high density but below this threshold are also encouraged to consider the provisions of this document as part of the design-led process, as it includes 'best practice' guidance that can help to ensure that the proposal is acceptable in design terms.

14.77 It is important to ensure that the quality of design that is granted permission is carried through to the final delivery of a development, both to ensure that high-quality design comes forward in the borough and also to provide trust in the process among local communities, who can feel confident that what is permitted is what will be developed. Part 3 of the policy sets out that the council may, where it is considered appropriate and necessary, require the use of planning conditions or planning obligations to ensure that design quality is carried through into the detailed design and construction of the development in accordance with London Plan Policy D4. This may include architect retention clauses or requirements for design certification. Providing the maximum possible level of design detail at application stage can reduce the need for later design amendments that could negatively affect development quality.

14.78 Further considerations relating to design quality can be found in the council's document Securing Design Quality – A Practice Note.

London Plan policies:

- D3 Optimising site capacity through the design-led approach
- D5 Inclusive design

- D6 Housing quality and standards

Local Plan policies:

- DV3 Healthy communities
- CG2 Low energy buildings
- CG4 Embodied carbon, retrofit and the circular economy
- CG5 Overheating
- CG8 Water efficient design
- CG9 Air quality
- CG10 Noise and vibration
- HF9 Housing standards and quality
- BO2 Open spaces and the green grid network
- BO3 Water spaces
- BO6 Play and recreation spaces

Evidence base:

- Characterisation and Growth Study, 2023
- Gender Inclusive Design: Creating a safe, inclusive and restorative borough, 2023
- Securing Design Quality – A Practice Note, 2023
- London Plan Guidance – Housing Design Standards, 2023
- Site Layout Planning for Daylight and Sunlight, 2022
- National Design Guide, 2021
- High Density Living SPD, 2020
- Planning and Social Cohesion Evidence Base, 2020
- Preventing Suicides in Public Places, 2015
- Character and Context SPG, 2014
- Conservation Area Character Appraisals and Management Guidelines

Policy PS4 Attractive streets, spaces, and public realm

1. Development is required to contribute to improving and enhancing connectivity, permeability, and legibility across the borough, ensuring a well-connected, joined-up, safe and easily accessible street network and wider network of public spaces through:
 - a. improving connectivity to public transport hubs, town centres, open spaces, water spaces, social and community facilities and surrounding areas;
 - b. maintaining existing public routes or appropriately re-providing access routes during the construction phases of new development;
 - c. incorporating the principles of 'secured by design', where these can improve safety and perception of safety for pedestrians and other users without significantly conflicting with other elements of good design including those set out in this policy; and
 - d. incorporating an inclusive 'healthy streets' approach to the design of new developments and improvements to adjacent streets where appropriate, particularly streets that are part of the green grid.
2. Development is expected to optimise the coverage and effectiveness of active frontages in order to create routes throughout the borough that feel safe for all users through:
 - a. prioritising active frontages along main roads and primary routes through sites;

- b. designing commercial and community uses so that the most active uses are facing the street;
 - c. not including frosted or otherwise obscured glazing along routes that are providing active frontages;
 - d. designing ground floor amenity uses in residential buildings so that more active uses are visible from the street or from primary routes through the site;
 - e. locating entrances in visible, safe and accessible locations;
 - f. ensuring that ground floor units can be accessed directly from the street;
 - g. creating opportunities for natural and passive surveillance, particularly at ground level;
 - h. locating inactive uses away from main roads and primary routes through sites; and
 - i. designing inactive frontages to be more attractive and, where appropriate, visually permeable.
3. Development is required to positively contribute to the public realm through:
 - a. providing clear definitions and enclosure through building frontage and massing, and connection and continuity of pedestrian desire lines and street activities, at a human scale;
 - b. providing a range of public spaces that can function as places for social gatherings and other recreational uses;
 - c. reducing visual clutter and obstacles in the public realm of the scheme and the adjacent area;

- d. ensuring balconies do not over-hang on the public highway or onto neighbouring properties, civic spaces and public buildings, such as schools;
- e. avoiding the creation of gated communities which do not promote socially inclusive and cohesive neighbourhoods or connectivity between places;
- f. using high-quality, robust, low-maintenance, and trip-proof materials for footways, parking spaces and local streets to create attractive, accessible, comfortable and useable public spaces;
- g. integrating high-quality public art into the public realm, especially at gateway locations or other appropriate landmarks, and retaining existing good quality art in the locality of new development, where possible;
- h. ensuring that all new streets contain native or drought-resistant trees or otherwise maximise planting and soft landscaping to provide visual and environmental relief from hard landscaping, buildings and traffic supported by a planting management and maintenance plan;
- i. designing out concealment points and leftover spaces;
- j. creating clear sightlines and visual permeability, and improving legibility of the surrounding area at all times of the day and night; and
- k. providing clearly lit, well-signed, and direct routes for night-time use.

- 4. The council will support proposals for suicide prevention safety measures to be added to bridges over water, roads, or rail, where these measures do not impede access to the transport or active travel network and are compatible with the conservation of heritage assets. The council will also support proposals for suicide prevention measures along waterfronts where these do not impede access or reduce the ability to use water spaces and adjacent waterfronts for leisure and recreational purposes.
- 5. Spaces underneath and within 5.5m from the edge of raised DLR viaducts should remain free from permanent structures and should be publicly accessible. Proposals to activate these spaces and promote healthy lifestyles, active travel, community activities, emissions reduction, and economic activity within the surrounding area will be supported.

Supporting text

14.79 As Tower Hamlets has some of the highest population densities in London, the quality of streets and spaces is important to maintain and create a high quality of life. This policy aims to deliver an attractive, legible, accessible, and well-designed network of streets and spaces which promote social interaction and inclusion which people of all ages and abilities can value and enjoy, and where they feel safe and comfortable. The public realm in the borough varies considerably, from the high-quality treatments around Canary Wharf (e.g. natural stone paving and tree planting) and conservation areas, through to the isolated, post-war streetscapes beyond Canary Wharf and Aldgate, as well as the severance arising from major arterial routes, such as Aspen Way and The Highway, around Bow, Poplar, Limehouse and the Tower of London. New development should always aim to provide a public realm which is an improvement on what was there before.

14.80 Part 1 encourages better connectivity and permeability around sites, encouraging people to easily and safely get around the borough – where possible, using active travel methods such as walking or cycling.

14.81 Connectivity refers to the number of connections and their integration, layout and relationship to one another and the impact this has when moving from one point to another. Permeability refers to the variety of pleasant, convenient, accessible, and safe routes through an area and the capacity of those routes to carry the movement of people, whilst avoiding visual clutter in the streetscape and barriers to pedestrian/cycle movement as much as possible. Legibility is the degree to which a place can be easily understood and moved around in.

14.82 In order to improve accessibility and increase movement, new development will also be required to follow a street hierarchy that



puts pedestrians and cyclists first and promotes streets as links for movement and as public places in their own right to ensure a strategic, accessible and safe street network across the borough. Development proposals should provide a clear understanding of the street hierarchy in the surrounding area, and also how new streets created by the development will be incorporated into the hierarchy. The hierarchy consists of:

- Main streets – focusing on movement, and prioritising the safe and convenient flow of buses, cyclists and pedestrians;
- Secondary streets – balancing movement of vehicles, cyclists and pedestrians with attractive and convenient places where people

gather and dwell; and

- Local streets – focusing on place, and protecting and enhancing the character and social gathering function that streets provide, alongside their function of providing safe and convenient access to individual properties.

14.83 Part 1(c) seeks to embed the principles of 'secured by design' into the design and layout of new development. Secured by design is a police-led initiative which focuses on how the design of the public realm can create places that are safe or unsafe, or perceived as such by those who use them. Developers should refer to the relevant guidance in relation to counter-terrorist and crime prevention security and engage fully in the pre-application process in order to ensure that measures to mitigate risks are incorporated into developments, where appropriate.

14.84 Where there is a need to ensure the safety of streets and public spaces, particularly crowded places, the correct level of protection should be provided without compromising the ability to create aesthetic and functional public spaces. Proposals should not impose undue restrictions on other occupiers in the area. Proposals should focus on creating places that feel safe while accommodating a range of uses, rather than through reducing activity by removing features such as seating.

14.85 Part 1(d) encourages development to apply the GLA's 'healthy streets' approach to the design of new public realm spaces. This approach aims to improve the character of London streets and the experience of those who use them, including those with additional accessibility needs. The approach is based on monitoring and improving ten indicators of what life on a healthy street should look like:

- Clean air

- Pedestrians from all walks of life
- Easy to cross
- Shade and shelter
- Places to stop and rest
- Not too noisy
- People choose walking, cycling and public transport
- People feel safe
- Things to see and do
- People feel relaxed

14.86 Further guidance on the implementation of the healthy streets approach can be found in the GLA guidance Healthy Streets for London (2017) and Guide to the Healthy Streets Indicators (2017).

14.87 Part 2 requires the creation of active frontages as part of new developments. Active frontages refers to areas at the ground level of a building where there is a feeling of activity, and the potential for activity. This can help to encourage a feeling of safety and sociability in the public realm by ensuring that users of the space – whether just passing by or dwelling in the space for some time – feel that they are not isolated and vulnerable.

14.88 Development proposals should demonstrate a clear understanding of where active frontages need to be prioritised, gained from a design-led approach to the proposal which includes consultation and engagement with a wide range of potential users of the space. Development should strike a careful balance between the need for privacy of residents and occupiers of a building, and the positioning of more sociable and active uses in such a way that they create active frontages and signpost legible and safe routes through sites.

14.89 Development proposals should avoid situations where the street level is forced to accommodate too many service functions (for example, bike storage, plant space, waste storage, etc.), leading to excessive amounts of inactive frontage. These service functions are important, but in many instances may be better accommodated as part of a basement, rather than creating large areas of street level 'dead space'.

14.90 Part 3 provides more general principles for ensuring an attractive and well-designed public realm. Public realm should be comfortable and functional, well-integrated with surrounding areas (including London's green grid network), and support the delivery of successful and vibrant places.

14.91 Development should create streets and spaces with a degree of enclosure by assisting in defining the edges of the public realm, through continuous building lines and active frontages. Development should avoid creating concealment points and external lighting should be an integral component in ensuring safety and security within the public realm in line with the principles of secured by design. To reduce street clutter, street lighting should be discreetly integrated into the design of buildings, where this is possible and does not adversely affect levels of light pollution for residents.

14.92 Balconies overhanging the public footway/ highway or onto neighbouring properties and buildings and spaces of civic importance have the potential to harm the safety and amenity of local occupiers, residents, and the public highway as well as cause overlooking, especially at the ground floor level.

14.93 Gated communities do not contribute to a well-connected, accessible, and permeable public realm, or socially inclusive and

cohesive neighbourhoods. Such proposals will be resisted, in line with the London Plan, and alternative means of providing safety and perceived safety should be explored through the implementation of good urban design principles.

14.94 Proposals should also use complementary elements, such as materials, finishes, furniture, landscaping, signage, lighting, and public art, to ensure that development and the public realm is at a human scale and puts people at the heart of the design process, so that the importance of how people view and feel about their environment is recognised. This should include ensuring design features meet the health and well-being needs of people (e.g., the provision of shade, shelter, and places to rest, including seating with supportive backs and arm rests). With regard to public art, efforts should be made to ensure that any such installations are as inclusive as possible and have been developed with the engagement of the community.

14.95 The inclusion of high-quality public art into the public realm is encouraged. Proposals for public art should be durable and robust, positioned so as not to create street clutter and obstruct the movement of pedestrians or cyclists, and make a positive contribution to the character of the local area, including by recognising local history and cultural heritage. Developers should engage with the council at an early stage in the process to best determine what will be appropriate and how public art can be successfully integrated within a site. The council will seek to secure appropriate maintenance of public art through conditions or other legal agreements.

14.96 The NPPF encourages new streets to be tree-lined, and this policy asks for new streets to incorporate trees where possible and to also include other forms of urban greening. This is an important component of creating healthy urban environments and can also help to ensure

that developments meet requirements elsewhere in this Local Plan for biodiversity improvements and urban greening. Planting strategies should be discussed with biodiversity and tree officers from the council at an early stage to ensure that the selected species are appropriate and can be adequately maintained. Non-native trees may not be appropriate close to sensitive habitats due to the potential for negative ecological impacts.

14.97 Part 4 of the policy sets out the council's support for necessary safety measures on bridges and at waterfronts within the borough, where these have been identified as posing a potential suicide risk. Such measures should be proportionate to the risk and must be in conformity with other policies in this plan, including those relating to access to the transport and active travel networks, access to water spaces, and to heritage conservation. Where such proposals are to be put forward, discussions should be opened with planning officers at the earliest opportunity, to ensure that measures can be implemented appropriately.

14.98 Part 5 promotes the activation of spaces under the DLR viaducts, to include them into the network of public realm and ensure connectivity between areas across the line. These spaces are currently underused and could present opportunities for a number of community-focused uses.

London Plan polices:

- GG3 Creating a healthy city
- D5 Inclusive design
- D8 Public realm
- G5 Urban greening
- T2 Healthy Streets

Local Plan policies:

- TC2 Protecting the diversity, vitality and viability of our town centres
- TC7 Evening and night-time economy
- BO2 Open spaces and the green grid network
- BO3 Water spaces
- BO4 Biodiversity and access to nature
- BO6 Play and recreation spaces
- RW3 Waste collection facilities in new development
- MC2 Active travel and healthy streets

Evidence base:

- Characterisation and Growth Study, 2023
- Gender Inclusive Design: Creating a safe, inclusive and restorative borough, 2023
- Spatial Planning and Health Needs Assessment, 2023
- Homes (Secured by Design), 2023
- National Design Guide, 2021
- High Density Living SPD, 2020
- Planning and Social Cohesion Evidence Base, 2020
- Tree Management Plan 2020-2025
- Making London Child-Friendly: Designing Places and Streets for Children and Young People, 2020
- Healthy Streets for London, 2017
- Guide to the Healthy Streets Indicators, 2017
- Preventing Suicides in Public Places, 2015
- Character and Context SPG, 2014
- Conservation Area Character Appraisals and Management Guidelines

Policy PS5 Creating inclusive places

1. Development proposals should demonstrate how gender inclusivity has been incorporated into the design, and that design is informed and shaped by the diverse communities of the borough, through:
 - a. the design of routes through and around the site, and how they connect to existing routes in the surrounding area – these should be legible, well-signed, appropriately lit, accessible, and ensure clear sight lines;
 - b. the design of communal and publicly accessible spaces in ways that encourage intergenerational sociability throughout the day and night and are not likely to encourage dominance of the space by a single group of people;
 - c. the provision of appropriate facilities for residents and the wider community, to ensure that the needs of the community are met;
 - d. the design of buildings, ensuring that they provide active and passive surveillance onto the street to increase the feeling of safety, and do not present avoidable obstacles to movement or accessibility;
 - e. ensuring pedestrian routes are surfaced with high-quality, easily maintainable material and are wide enough to give space to pass by, and to use a wheelchair or pushchair while also walking with one or more additional children;

- f. safe access to less active parts of the development, such as bin and bike storage areas; and
 - g. inclusion of public art and street and building names that recognise people from diverse backgrounds who have contributed to shaping the borough, including women, disabled people, the LGBTQ+ community, and ethnic minorities.
2. Development proposals should demonstrate that reasonable efforts have been made to make the design process inclusive. This should include:
 - a. involving diverse sections of the community in co-design of development proposals from an early stage, including women and girls, people with disabilities, the LGBTQ+ community, and ethnic minorities; and
 - b. demonstrating that local knowledge, captured through early engagement and co-design, has informed and shaped design proposals.

Supporting text

14.99 This policy encourages all new development to consider inclusive design as part of the development process. This policy is based upon a gender-inclusive design evidence base document that has been prepared by the council, and a disability-focused local plan consultation workshop held with the disabled people's organization Real at Regulation 18 consultation stage. Evidence from the UN, the World Bank, and the GLA shows that if the needs of women and girls are considered and shape the development of the urban environment, outcomes will be more welcoming and work better for all. Therefore, designing with women and girls creates better places. Our own research with women and girls, disability and LGBTQ+ groups shows that meeting the needs of women and girls also helps to meet the needs of minority and marginalised groups.

14.100 Women make up 50% of the population, but historically the majority of places have been designed by men and for men. This can be seen in wider structural patterns of the urban environment, such as the focus in transport policy on moving people from the suburbs to the city centre, accommodating a standard 'commuter' pattern of travel that has historically been more likely to apply to men; while neglecting the more disparate patterns that are often attributed to women in their role as caregivers – for example, needing to travel between home and school, from school to the shops, back to the home, back to the school, then to swimming lessons, and so on. But it can also be seen in the smaller details of design – uneven pavements and unnecessary stairs, which make life harder for those with pushchairs (and for others, such as those in wheelchairs or with reduced mobility in other ways). In other instances, the design of cities can create spaces that feel unsafe and unwelcoming – places that feel deserted and isolated, or places where women and gender-diverse people may feel like they are 'out of place'.

14.101 Statistics may indicate that that crime in these spaces is low, although this may be impacted by low rates of reporting crime. However, if people feel unsafe, they are unlikely to use the spaces, or will feel uneasy if they do. This can create a cycle of spaces becoming under-utilised, which creates opportunities for people to commit antisocial behaviour or illegal acts such as drug dealing.

14.102 A focus on gender inclusivity in design is not intended to exclude or polarise communities. Instead, by 'modelling' improvements that benefit women, girls, and gender-diverse people, we are able to rebalance urban design to the benefit of all people by improving the experience of those who do not adhere to the 'norms' of a cis-gendered white male population (whom much of the city was initially designed by and for). The policy does not indicate that men pose an inherent risk or are a 'problem' within the urban environment that must be 'solved', but rather to address how urban environments have often been designed in ways that disadvantage women, girls, and gender-diverse people. By remodelling the borough through the lens of gender inclusion we are able to ensure that everyone can use, enjoy and experience an equal city and that over time our built environment will be more representative and welcoming to all. And when women and girls feel welcome, it has a positive impact on the social and economic prosperity of a place – so proactively designing welcoming spaces that encourage women and girls to feel welcome also develops regenerated spaces that benefit the whole community.

14.103 To understand this topic, an evidence base document on gender inclusivity in the urban environment has been prepared. This has included on-street interviews with women and girls across the borough, workshops with community organisations, online 'walks' around the borough to discuss safety concerns, and detailed surveys and questionnaires. Over 400 women and girls participated in this research

and by listening to their lived experience of the borough we have developed a series of recommendations that suggest new approaches to development and the way development is planned and delivered, from a high level approach to specific fine grain recommendations to improve streets, public spaces and building exteriors (such as entrance ways and exits).

14.104 In addition to this work on gender-inclusivity, as part of the Regulation 18 consultation on the local plan, a disability-focused workshop was co-produced with the disabled people's organization Real. This attracted over 50 participants, who worked together to discuss clusters of questions relating to the local plan themes, and led to a greater understanding of the needs of disabled people within the urban environment. The conclusions from this workshop, along with consultation responses from other groups and individuals representing marginalized communities, has led to the refocusing of this policy towards a more generally inclusive design approach, and an intersectional approach that recognises that people may belong to a combination of marginalised communities based on gender, sexuality, ethnicity, disability and neurodivergence, and age. This further emphasizes that improvements to the public realm, building design, and community spaces that will benefit women and girls will also benefit the majority of people – including other marginalized communities such as disabled people, the LGBTQ+ community, and ethnic minorities, but also benefitting those who do not fall into any of these categories.

14.105 Alongside this specific policy, which sets out our understanding of some of the elements of inclusive design, we thread inclusivity throughout the policies in the plan to help embed greater inclusivity in all development proposals.

14.106 Part 1(a) concerns routes, wayfinding, and connectivity. In line with policy PS4, sites should be connected, permeable, and legible – there should be multiple ways to get to destinations and development should be designed, laid out, and incorporate wayfinding in such a way that it is clear to a passerby which are the main routes through the sites, and which are more likely to be of interest only to residents. Consideration should be given to how routes may feel different in the daytime and the nighttime, and to how wayfinding measures clearly identify better lit and more populated routes at nighttime. Regular and visible naming of different areas within the development can also make it easier for people who need to call for help to describe where they are, and can help to make a place feel like a part of the public realm rather than a private space aimed only at residents.

14.107 Parts 1(b) and 1(c) regard community facilities, including new open spaces and other social facilities, including large elements of social infrastructure such as new schools or health centres that may be provided on particularly large development. Tower Hamlets has a shortage of high-quality open space, and as the density of the borough increases, the amount of open space per resident decreases further. Our evidence base on gender-inclusive design indicates that women often feel excluded from some open spaces in the borough, where these are felt to provide few facilities or to be poorly designed in terms of visibility and feeling welcome; and our disability-focused workshop also highlighted the importance of green spaces and a need for improved facilities within them. Women with children are particularly in need of accessible, welcoming open spaces with high-quality play facilities for children, and these spaces can also provide a means of socialising with other parents. Given the lack of access to private open spaces such as gardens in Tower Hamlets, and that green and open spaces have been

demonstrated to have significant health and environmental benefits, it is particularly important that developments aim to maximise the amount of high-quality open space they provide, that this space be as green as possible, and that it be as inclusive as possible, with good places to sit, complex planting, trees to provide shade, somewhere to have a picnic, somewhere to play, and somewhere teenage boys can meet away from the main path. The design and location of new open spaces should therefore be considered as carefully as the design of buildings or streets and should not be relegated to an afterthought.

14.108 Open spaces should be designed in collaboration with the community, and should include elements that promote intergenerational sociability (our gender-inclusive design evidence base has found that spaces that are occupied by a more diverse range of people, including people of different ages, feel safer and more welcoming), including benches and other forms of seating, areas of planting that create shade, and elements that can be used by children to play. Improved seating in parks was highlighted in our disability-focused workshop, and is helpful for older people as well as providing spaces for parents and others to socialise. Parks and green spaces need social infrastructure to feel safe and welcoming, including wardens, resident groups and opportunities to get involved in gardening and growing food, which can create opportunities for passive surveillance. Opportunities to play are important for all children and guidance on making space for teenage girls is suggested in the gender inclusive design guidance. In order to ensure that play space is well-used, there should be meaningful engagement with children to understand how they play in their area, and this should inform the play strategy rather than merely responding to a pre-prepared strategy. The different ways teenage girls and teenage boys take up space should also be considered with consideration that both groups need access to outdoor space and both have a right to

open space for health and wellbeing.

14.109 Beyond open space, other necessary facilities could include wheelchair-accessible public toilets with baby-changing facilities, water fountains, community hubs, youth provision, and generous, well-designed open spaces. There should be facilities near to play areas for mothers and caregivers to be able to meet and socialise outdoors, and facilities for young children, for girls and young women, as well as boys and young men.

14.110 In designing buildings, active frontages are encouraged in part 1(d) and through policy PS4, as they can provide feelings of safety and sociability through encouraging activity at different times of the day and night. This can assist in making women and other vulnerable users of streets feel safe and able to use streets throughout the day and into the evening and nighttime to create busy, intergenerational, connected places. Building entrances (including subordinate entrances such as back or side doors) should be well-lit and easily visible, avoiding narrow or concealed entranceways.

14.111 In line with the street hierarchy discussed under Policy PS4, the needs of pedestrians and those using the pavement should be given the highest priority. In many instances, existing pavements are narrow and filled with physical clutter (such as fixed street furniture or parked cars), or consist of uneven or easily damaged surface material that can make movement difficult for those with pushchairs or those in wheelchairs. Part 1(e) requires that pedestrian routes should be wide enough to accommodate the needs of all those who use them.

14.112 While active frontages are encouraged, there will always necessarily be some inactive spaces within a development, and these are considered in part 1(f). Some of these inactive spaces may be useful

facilities, such as waste or bike storage, and consideration should therefore be given to how safe and well-lit routes can be provided to allow access to and from these spaces, while also ensuring that items like bins do not block walkways, entrances, or sightlines.

14.113 Part 1(g) should be read in conjunction with the general public art requirements in policy PS3. Research into public art in the UK has shown a severe lack of diversity, with only 2% of named statues representing ethnic minority people, and most of the statues of women that exist being fictional or allegorical representations or royal women. Statues of disabled people or members of the LGBTQ+ community are similarly rare.

14.114 The development of new public art provides an opportunity to somewhat redress this balance, as does the naming of new streets and buildings, by recognising the contributions that marginalised communities have made to the development of the east end of London and the history of our communities through direct representations or by commissioning work by women, ethnic minorities, members of the LGBTQ+ community, or disabled people to explore those stories.

14.115 In all circumstances, designing for inclusiveness means designing with the community, and ensuring the community feel that they have been able to co-design development, rather than having development imposed upon them. The gender-inclusive design evidence base shows that when women and girls are closely consulted, their lived experiences are listened to, and their needs inform design outcomes, this helps to create places with high social and economic prosperity and to build stronger social networks and climate resilience - that is, it helps to create better places for all. Part 2 requires that constructive engagement and co-production with the community should begin at

the earliest possible stage and the community should have an input into what is provided on a site rather than simply being asked to respond to pre-prepared proposals. The final design of a site must be grounded in an understanding of the community, and this means that particular consideration should be given to hearing the voices of women, girls, disabled people, the LGBTQ+ community, and ethnic minorities in the design of proposals, to ensure their views are considered.

14.116 Design and Access Statements or Consultation Statements should demonstrate that efforts have been made to consult widely from the beginning of the design process, and that specific efforts have been made to include diverse communities and marginalised communities in this consultation process. Engagement with these communities should aim to be accessible and participatory, and not simply provide pre-prepared options for comment. There should be a clear understanding of how different groups may interpret and use space differently, and a demonstration of how community responses have been considered and incorporated into the final proposed design of development, as well as into proposals for the wider public realm access routes and connections. Where an Environmental Impact Assessment is required, the data used should be disaggregated by gender and other protected characteristics where possible, to inform a greater understanding of how different groups will be affected by the proposals. The council may look to produce further guidance to set out a framework for inclusive engagement.

14.117 To fully implement inclusivity in the design process, applicants could go further than simply consulting the community. Gender parity in the project teams working on the proposal can help to encourage a greater consideration of women and girls throughout the process,

and the inclusion of workers from other marginalised communities can further help to inform an inclusive approach to design. This could include taking on people from the local area as graduates, apprentices, or for work experience, to encourage a longer-term approach to inclusiveness and diversity across the built environment industries, and consideration of social value throughout the development process.

14.118 This policy should be read in conjunction with policy DV3 on healthy communities, which provides further details around what is required of an applicant to ensure the needs of vulnerable groups have been understood and secured through the planning process. The early initiation of a Health Impact Assessment and community engagement will support the applicant in achieving inclusive design outcomes.

London Plan polices:

- D5 Inclusive design
- D8 Public realm
- S4 Play and informal recreation
- S6 Public toilets

Local Plan policies:

- DV3 Healthy communities
- HF9 Housing standards and quality
- TC2 Protecting the diversity, vitality and viability of our town centres
- TC7 Evening and night-time economy
- Cl1 Supporting community facilities
- Cl2 Existing community facilities
- Cl3 New and enhanced community facilities
- Cl5 Arts and culture facilities
- BO2 Open spaces and the green grid network

- BO3 Water spaces
- BO4 Biodiversity and access to nature
- BO6 Play and recreation spaces
- RW3 Waste collection facilities in new development
- MC2 Active travel and healthy streets

Evidence base:

- Gender Inclusive Design: Creating a safe, inclusive and restorative borough, 2023
- Spatial Planning and Health Needs Assessment, 2023
- Safety in Public Space: Women, Girls and Gender Diverse People, 2022
- High Density Living SPD, 2020
- Planning and Social Cohesion Evidence Base, 2020
- Making London Child-Friendly: Designing Places and Streets for Children and Young People, 2020

Policy PS6 Heritage and the historic environment

1. Proposals must conserve or, where appropriate, enhance the borough's designated heritage assets in a manner appropriate to their significance.
2. Proposals affecting the significance of a heritage asset must:
 - a. provide a clear understanding of the asset's significance;
 - b. provide sufficient information to demonstrate how the proposal would contribute to the asset's conservation;
 - c. justify any harm to the significance of the heritage asset, having regard to the public benefits of the proposal when considering designated heritage assets;
 - d. demonstrate that all reasonable efforts have been made to sustain the existing use, find alternative uses that would avoid harm, or minimise and mitigate the extent of the harm to the asset;
 - e. demonstrate that the works proposed are the minimum required to secure the long-term use of the asset; and
 - f. demonstrate that efforts have been taken to retain, repair, or reinstate historic features where appropriate.
3. Substantial harm to or the total loss of significance of a designated heritage asset will only be supported where it is necessary to achieve substantial public benefits that outweigh that harm or loss, or the following criteria can be satisfied:
 - a. the nature of the heritage asset prevents all reasonable uses of the site;
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
 - c. conservation by grant-funding or some form of not-for-profit, charitable or public ownership is demonstrably not possible; and
 - d. the harm or loss is outweighed by the benefit of bringing the site back into use.
4. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.
5. Proposals should conserve or, where appropriate, enhance the borough's non-designated heritage assets. Where there will be direct or indirect harm to the significance of a non-designated heritage asset a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset.
6. Proposals to alter or extend a heritage asset or proposals that would affect the setting of a heritage asset will only be permitted where:
 - a. they safeguard the significance of the heritage asset, including its setting, character, fabric or identity;
 - b. they are appropriate in terms of design, height, scale, form, detailing and materials in their local context;
 - c. they enhance or better reveal the significance of assets or their settings;
 - d. the building retains its character and can provide housing or

- other appropriate uses without damaging its historic and cultural significance to the borough;
- e. extensions to listed buildings, or new developments within the curtilage of listed buildings, remain subservient to the host building in terms of height, massing, and scale; and
 - f. where proposals affect the setting of a heritage asset, they should clearly demonstrate an understanding of the setting and how that setting contributes to the significance of the heritage asset concerned.
7. In the case of a change of use from a use for which a heritage asset was originally designed, it must be clearly demonstrated that any harm to the significance of the heritage asset caused by the new use, or by any changes to the building fabric required to implement the new use, is justified when weighed against the public benefits of the proposal, including the benefit of securing the optimum viable use.
8. Proposals for development within a conservation area (as shown on the policies map) or its setting must:
- a. preserve or enhance those elements (including unlisted buildings) which make a positive contribution to the special character or appearance of the conservation area;
 - b. make a positive contribution to local character and the distinctiveness of the conservation area; and
 - c. explore opportunities for new development to enhance or better reveal the significance of the conservation area.
9. Proposals for development that would affect scheduled monuments (as shown on the policies map) or other archaeological sites of equivalent importance must:
- a. justify any harm to the significance of the asset having regard to the public benefits of the proposal;
 - b. demonstrate that all reasonable efforts have been made to mitigate the extent of any harm to the significance of the asset; and
 - c. demonstrate that the works proposed have the minimum impact upon the asset while ensuring that its significance is maintained.
10. Proposals that lie within Archaeological Priority Areas (as shown on the policies map) or other areas that have the potential to contain archaeological heritage assets must:
- a. include an archaeological evaluation report to assess the archaeological potential of the affected area; where necessary, a field evaluation may also be required;
 - b. conserve nationally important remains in situ, subject to consultation with Historic England;
 - c. where other archaeological heritage assets are identified, provide sufficient information to demonstrate how the proposal would contribute to the asset's conservation; and
 - d. where harm can be fully justified, make provision for archaeological excavation and/or recording as appropriate, followed by analysis and publication of the results.
11. Proposals for development that would affect historic parks, gardens and spaces (as shown on the policies map) must:
- a. include a heritage impact assessment setting out the likely impact which it would have upon its significance and the means by which any harm might be mitigated;

- b. conserve those features which form an integral part of the special character or appearance of the park, garden or square; and
- c. ensure they do not detract from the enjoyment, layout, design, character, appearance or setting, key views into and out of the space, or prejudice its future restoration.

12. Proposals that would affect heritage assets listed on the Historic England Heritage at Risk Register will be supported where:

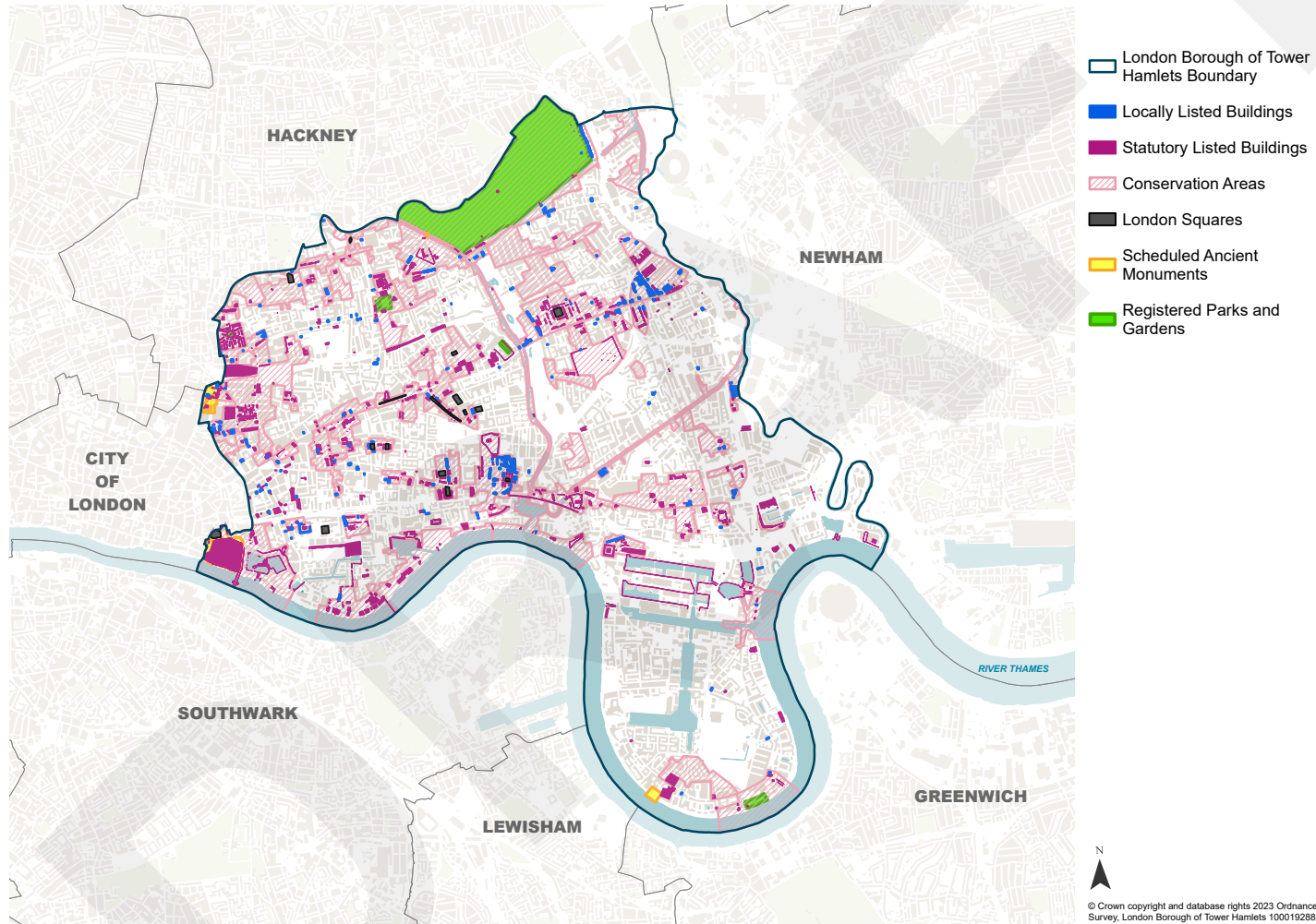
- a. they conserve or enhance the heritage asset in a manner appropriate to its significance;
- b. they provide a viable, long-term use for the heritage asset; and
- c. sensitive repair and restoration is proposed to elements of the heritage asset that have fallen into disrepair.

13. Where development proposals affect historic street surfaces or street furniture, these should be conserved and, where appropriate, restored as part of the public realm proposals on the site. Where development will require the temporary removal of historic street surfaces or street furniture, these should be reinstated in the same or better condition than before the development took place. Proposals for the loss of historic street surfaces or street furniture will not be supported, unless it can be demonstrated that the public benefits of the proposal outweigh the loss of the historic surfaces or street furniture, and no viable development proposal can be found that would allow for the retention of these features.

14. Retrofitting of heritage assets to achieve greater levels of energy efficiency and reductions in carbon emissions will be supported where it is proposed in a manner that conserves or enhances the significance of the heritage asset.



Figure 13: Map of heritage assets in the borough



Supporting text

14.119 This policy aims to protect the borough's heritage and character in line with the council's statutory duties, and sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic environment (including individual assets and their settings) to ensure that its distinctive character is maintained.

14.120 The heritage of Tower Hamlets consists of an enormous variety and diversity of assets, including historic buildings, structures, parks and open spaces, views, archaeology, and heritage collections. These heritage assets are widely valued, cared for, and celebrated by Tower Hamlets residents, for whom they form a source of pride in the borough. They are also recognised more widely, and the borough is visited from across London, the country, and the world by those seeking to understand and experience the histories and heritage of Tower Hamlets and the wider East End of London.

14.121 Our heritage assets are exceptionally important – they are our most recognisable landmarks and most cherished places, and they contribute to reinforcing the unique character and distinctiveness of the borough (including its 24 places) as well as London as a whole through their individual and group value. Some of the key elements of the borough's heritage include:

- military and naval buildings (e.g. Tower of London);
- museums, art galleries, music halls and breweries (e.g. Young V&A and Wilton's Music Hall);
- squares, cemeteries and parks and gardens (e.g. Tower Hamlets Cemetery Park);



- indoor and outdoor markets (e.g. Spitalfields);
- industrial heritage and archaeology (e.g. the Docklands);
- residential streets and buildings of Georgian and Victorian origin (e.g. Fournier Street and around the Victoria Park Conservation Area);
- innovative post-war housing (e.g. Keeling House and Balfron Tower); and
- religious and education institutions (e.g. Christ Church Spitalfields and Toynbee Hall).

14.122 The importance of protecting heritage is reflected in the national and regional policy that informs this Local Plan. The council is required to have a positive strategy for understanding and conserving important aspects of our heritage, and the borough's Conservation Strategy sets out a clear vision that recognises and embeds the role of heritage in planning and design. This policy therefore reflects the Conservation Strategy, by setting out the parameters within which development can sustainably take place while also preserving the most important parts of the borough's heritage. The importance of heritage needs to be balanced with the borough's other needs, including the need to provide good-quality housing and reduce overcrowding, and this policy sets out a proportionate response to this challenge.

14.123 Part 1 of the policy sets out the overall aim of preserving and enhancing heritage assets throughout the borough.

14.124 Designated heritage assets include statutorily listed buildings and structures, registered parks and gardens, conservation areas, scheduled monuments, world heritage sites and their buffer zones (see Policy PS7), and archaeological priority areas. These designations are shown on the policies map.

14.125 In addition to the above, there are many non-designated buildings and sites of heritage significance within the borough which contribute to its distinctive character, such as unregistered parks and gardens, London Squares, unlisted public houses, cemeteries, and places of worship. Details of some of these assets are available in the Tower Hamlets Conservation Strategy, Conservation Area Character Appraisals and Management Guidelines and the Local List. The Local List identifies locally important heritage assets which are of community value and contribute to the special character and distinctiveness of the borough.

14.126 Alongside their physical characteristics, heritage assets can also have a more intangible cultural significance and can include sites that are not yet designated as heritage assets but which have significant cultural value for particular groups of people, including marginalised groups. Within Tower Hamlets, certain locations may have intangible cultural value for particular sections of the community. The initial process of consultation and engagement with the community around the design and development of sites should help to identify where significance exists, and to identify the elements of a site that the local community considers to be of heritage value. This further highlights the importance of that engagement taking place at the earliest possible stage to inform the design response.

14.127 Parts 2-6 set out the approach to be taken when development proposals affect the significance of heritage assets, while parts 7-12 provide additional detail about proposals that would affect the significance of specific classes of heritage asset. In all cases, the preference is for no harm to take place; but in circumstances where there is some harm to heritage assets, this must be robustly justified, and in the case of designated heritage assets any harm must be justified with reference to the public benefits of the proposal in question.

14.128 In order to satisfy the criteria set out in parts 2 to 12, developments will need to demonstrate an understanding of the significance of the relevant asset, including the contribution setting makes to its significance, submitting a statement of significance, including a heritage impact assessment, as part of the planning application process. This should also consider an assessment of group value, as well as the individual significance of heritage assets.

14.129 At a minimum, this should include both desktop analysis and on-site investigation, with reference to the Greater London Historic

Environment Record and other relevant documentation. The borough has a local history library, which provides a useful resource. Research undertaken into the heritage asset affected should describe the significance of the heritage asset in sufficient detail to determine its historic, archaeological, architectural, or artistic interest to a level proportionate to its importance.

14.130 Detailed plans to an appropriate level will need to be submitted with applications as part of design and access statements/heritage statements to demonstrate how the heritage asset and its setting will be impacted and to ensure that its significance is protected or enhanced.

14.131 Where a new heritage asset is discovered or previously unknown historic fabric revealed, the developer will be expected to work with us to seek a solution that protects the significance of the new discovery, so far as is practicable within the existing scheme. Depending on the importance of the discovery, modifications to the scheme being implemented may be required.

14.132 Under part 2 of the policy, proposals relating to works to a listed building or within the vicinity of a listed building or to other heritage assets will be required to demonstrate that they will not affect the special interest of the listed building or heritage asset. In addition to planning permission, listed building consent may also be required for works that will affect the special character of a listed building. Harm to the significance of a heritage asset will not ordinarily be supported. Where such harm is proposed, proposals will need to include robust justification of why the public benefits of the proposal outweigh the harm to heritage significance, and will need to demonstrate that alternative options that avoid harm have been explored and found unfeasible, and

that the proposed harm has been mitigated to the greatest degree possible.

14.133 The council will not permit substantial harm to or total loss of a designated heritage asset unless the criteria set out in part 3 can clearly be met. In instances of less than substantial harm to a designated heritage asset, the test in part 4 should be applied.

14.134 Part 5 emphasises that non-designated heritage assets should also be considered as part of development proposals, and proposals should aim to conserve or enhance these assets as well. Early engagement with planning officers is encouraged to help identify non-designated heritage assets. When considering applications that affect non-designated heritage assets (either directly or indirectly), the council will have regard to the scale of any harm or loss, and the significance of the heritage asset when making a planning decision.

14.135 The council will only permit proposals for alterations to heritage assets or for development that affects the setting of a heritage asset where the criteria set out in part 6 can be met.

14.136 In the case of changes of use of heritage assets, as set out in part 7, it is important to note that while a change of planning use class might be acceptable in theory, the practical implications of that change of use in terms of any alterations to the fabric of the building will need to be assessed in terms of how they affect the significance of the heritage asset, and whether they help to secure the optimum viable use of the asset. The optimum viable use of a heritage asset may not necessarily be the most economically viable use – if there is a range of economically viable uses, the optimum viable use is the one which will cause the least harm to the significance of the heritage asset. Before

applying for a change of use of a heritage asset, careful consideration should be given to any physical changes that would be needed, and these should be clearly set out and justified as part of a planning application. The council's preference for changes of use to historic buildings is for buildings to be repurposed to help meet the borough's high need for housing, and particularly affordable housing. However, it is acknowledged that this will not always be possible given the particular sensitivities of heritage buildings and the difficulties that this can create in conversion to residential.

14.137 When considering proposals within conservation areas, as set out in part 8, consideration will be given to the relative significance of the element affected and its contribution to the significance of the conservation area as a whole and its setting. We have prepared a series of conservation area appraisals and management plans that assess and evaluate the character and appearance of each of our conservation areas and set out how we consider they can be preserved or enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a way that retains the distinctive character and appearance of our conservation areas and will expect new development to contribute positively to this.

14.138 Proposals that would affect scheduled monuments must meet the criteria set out in part 9.

14.139 In relation to part 10, any development within or adjacent to archaeological priority areas is required to investigate and consider any archaeological interests in the area. The archaeology of the borough can best be protected if as much information as possible is available at the planning application stage. The evaluation, which may



involve fieldwork, is needed so that we can assess the archaeological implications of proposals. Where appropriate, the evaluation may show how developments can be designed so that they do not harm a site of archaeological interest and/or how the remains will be preserved at the site.

14.140 Proposals that would affect historic parks and gardens must meet the criteria set out in part 11. This policy applies to both designated and non-designated historic open spaces, which includes registered parks and gardens, London Squares, and other open spaces of historic interest.

14.141 Where possible, we will seek to work with developers and other partners to secure creative solutions that would conserve heritage buildings, especially those at risk (as identified on the borough's heritage at risk register), and contribute positively to the character and vitality of the surrounding area. Under part 12 of the policy, proposals that bring heritage assets that are at risk back into viable, long-term use will be encouraged where they also preserve the heritage significance of the asset.

14.142 The borough contains some sites where historic street surfaces or street furniture (such as bollards, street signs, and coal hole covers) are present, and part 13 requires these features to be preserved and enhanced by development of adjacent sites. Historic surfaces can cause difficulties for those who use wheelchairs or have other mobility impairments, or for parents with pushchairs, and consideration should be given to accessibility and inclusivity in locations with historic surfaces. This could include ensuring that pavements to the side of cobbled streets are suitably wide and well-maintained, or clearly signposting alternative routes that avoid uneven surfaces.

14.143 Part 14 indicates that retrofitting of heritage assets to achieve greater energy efficiency is to be encouraged, in line with the council's policies on climate change and improved air quality. However, this needs to be done carefully to ensure that heritage assets are not damaged in a way that is contrary to the rest of the policy, and so in some instances a balance may need to be struck between the need to improve energy efficiency and the protection of heritage. Retrofitting of heritage assets should take a non- or minimally-invasive approach, and this may require that bespoke and non-standard approaches to energy efficiency are taken. Regard should be had to Historic England's advice note on Energy Efficiency and Traditional Homes.

14.144 Where necessary, the council will consider using legal powers to ensure that essential maintenance of designated heritage assets is undertaken.

London Plan policies:

- HC1 Heritage conservation and growth

Local Plan policies:

- CG4 Embodied carbon, retrofit and the circular economy

Evidence base:

- Conservation Strategy, 2023
- Conservation Area Character Appraisals and Management Guidelines
- Local Heritage List
- Heritage at Risk register

Policy PS7 World heritage sites

1. Development is required to ensure it safeguards and does not have a detrimental impact upon the outstanding universal value of the UNESCO world heritage sites: the Tower of London and Maritime Greenwich, including their buffer zones (as shown on the policies map) and settings.
2. Proposals affecting the wider setting of the Tower of London and Maritime Greenwich or those impinging upon strategic or other significant views to or from these sites (particularly around Tower Hill and Aldgate and within the buffer zone around Island Gardens) will be required to demonstrate how they will conserve and enhance the outstanding universal value of the world heritage sites.
3. Development within the vicinity of the Tower of London is required to demonstrate how it will improve local pedestrian and cycle access routes, particularly through signage and wayfinding in the surrounding area.

Supporting text

14.145 This policy aims to ensure that new development safeguards and does not negatively impact on the 'outstanding universal value' of the Tower of London and Maritime Greenwich world heritage sites, including their attributes, settings, and views to and from them. In this context, outstanding universal value is defined by UNESCO as "areas of cultural and/or national significance so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity". Attributes of outstanding universal value are usually physical, but can also be processes or practices (such as tradition, or management regimes) that have an impact on physical qualities.

14.146 World heritage sites are areas of cultural and national significance which include both natural features and human-made structures. London has four world heritage sites, one of which is within Tower Hamlets (the Tower of London), and one of which is just across the river Thames in Greenwich, and with a buffer zone that extends into Tower Hamlets (Maritime Greenwich).

14.147 The Tower of London, one of the UK's most famous landmarks and tourist attractions, is a Grade I listed castle and royal fortress, which acts as the gateway into the borough from the west. Indeed, the borough is named after the villages and hamlets around the Tower of London. However, many of the streets and spaces in and around this area are dominated by vehicles/heavy traffic and offer a poor public realm and interchange experience from Tower Hill and Tower Gateway stations. These issues are also identified within the Tower of London World Heritage Site Management Plan.

14.148 Maritime Greenwich lies immediately south of the borough and comprises an ensemble of buildings (including the Queen's House, Royal Observatory, and the Old Royal Naval College) set in landscaped parkland. Part of the buffer area lies within Tower Hamlets at Island Gardens on the Isle of Dogs, from where a classic view of the world heritage site can still be seen.

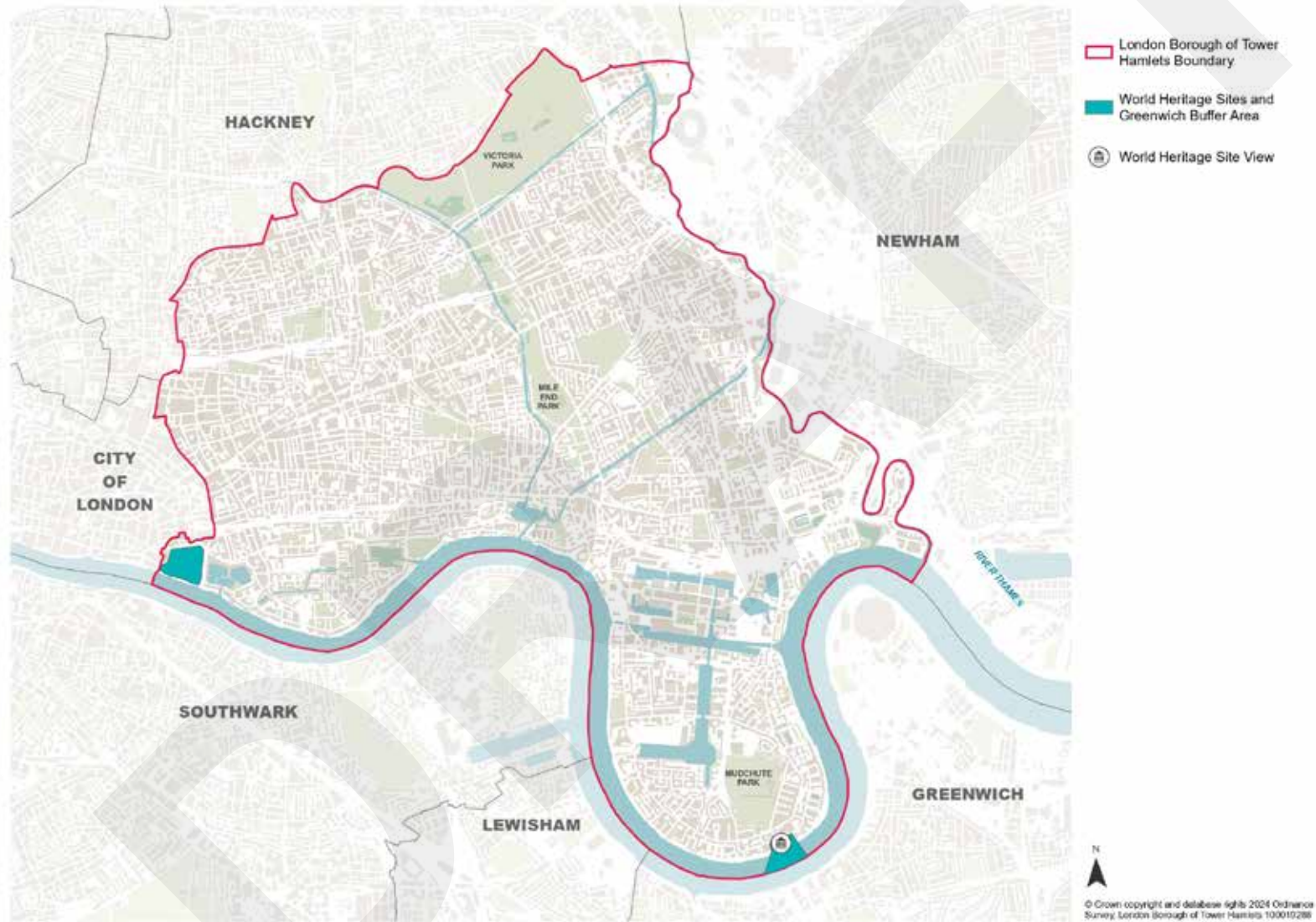
14.149 Part 1 of the policy sets out that these unique heritage assets must be safeguarded, and that development must not detract from the outstanding universal value for which they have been designated.

14.150 Under parts 2 and 3, proposals within close proximity to the Tower of London, or which have the potential to affect the setting and views of the Tower of London or Maritime Greenwich, will need to ensure they have regard to the Tower of London World Heritage Site Management Plan and/or the Maritime Greenwich World Heritage Site Management Plan.

14.151 Potential opportunities exist to enhance the setting immediately around the Tower of London and reinforce the outstanding universal value of the site, in line with the Tower of London Local Setting Study (2010).



Figure 14: World heritage sites – Tower of London and Maritime Greenwich buffer zone



London Plan policies:

- HC1 Heritage conservation and growth
- HC2 World Heritage Sites

Local Plan policies:

- MC2 Active travel and healthy streets

Evidence base:

- Views and Landmarks Study, 2024
- Conservation Strategy, 2023
- Tower of London World Heritage Site Management Plan, 2016
- The Protection and Management of World Heritage Sites in England, 2015
- Maritime Greenwich World Heritage Site Management Plan, 2014
- London View Management Framework SPG, 2012
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011

Policy PS8 Shaping and managing views

1. Development is required to positively contribute to views and skylines within the borough, particularly those that are important components of the character of Tower Hamlets. Intrusive elements in the foreground, middle ground and backdrop of such views will be resisted. Development will be required to demonstrate how it:
 - a. complies with the requirements of the London View Management Framework and World Heritage Site Management Plans for the Tower of London and Maritime Greenwich;
 - b. positively contributes to the skyline of strategic importance, which is formed from the silhouettes of the cluster of tall buildings around Canary Wharf (as defined on the policies map);
 - c. preserves or enhances the prominence of borough-designated landmarks and the skyline of strategic importance in the borough-designated views, taking into account the reasons for designation and the guidance for future development provided in the Tower Hamlets Views and Landmarks Study;
 - d. preserves or enhances local views identified in conservation area appraisals and management guidelines;
 - e. preserves or enhances visual connections between the public realm and water spaces and open spaces; and
 - f. enhances, creates, or preserves townscape and views to and from the site which are important to the identity and character of the place.
2. Development in close proximity to, or within the sightlines of, borough-designated landmarks should apply the following principles, to ensure that the value of these landmarks is protected:

Landmark	Principles
Christ Church Spitalfields	a. Future development on Brushfield Street must not step out beyond the existing building line to preserve the view of the church. b. Building heights should not be higher than the church in order to ensure the landmark stands out from its immediate context. c. Nearby development should ensure that the heights allow an unobstructed view of the church’s rooftop, particularly its spire. d. The commercial and fine grain character of the ground floor on surrounding streets should be maintained to enhance the wider character of the Conservation Area.

Landmark	Principles
Balfro Tower	<p>a. Future development should maintain a view of the clear separation between the servicing/lift tower and the main body.</p> <p>b. Development should maintain the sky space to either side and at the top of the tower to preserve the clear views of Balfro Tower.</p> <p>c. The green and open character within these views should be preserved to enhance the setting of the tower.</p>
Canada Square Cluster	<p>a. Development should not obstruct the gaps between buildings in the Canada Square Cluster to preserve readability, balance, and aesthetics.</p> <p>b. Development should not impair visibility to 1 Canada Square's pyramid pinnacle to ensure its distinctiveness is unrivalled.</p> <p>c. Development should not interfere with the Canada Square Cluster's long range views, to preserve Canary Wharf's distinctive skyline.</p> <p>d. Any future built interventions in Canada Square Park should not have a negative impact on legibility and wayfinding and should enhance the cluster's identity as a unified landmark.</p>
St Anne's Church	<p>a. The massing around the intersection of Commercial Road and West India Dock Road should be designed in a way that preserves and frames views to the church tower above the trees.</p> <p>b. Heights on Salmon Lane should remain low to accentuate the views of the church with Canary Wharf in the background.</p>
St George-in-the-East Church	<p>a. Heights along Chigwell Hill, Wapping Lane, and The Highway should remain low to maintain and frame views to the church tower and turrets.</p> <p>b. Building frontages on The Highway should be articulated to contrast the large composed southern façade of the church and to complement the historic terraces on Cable Street to the north.</p>
East London Mosque	<p>a. Future development along Whitechapel Road should consider an articulated massing to avoid overwhelming the mosque.</p> <p>b. Massing should respect views to the minarets to protect their visibility.</p>
The Guardian Angels Roman Catholic Church	<p>a. Heights should remain similar to the existing historic roofline on Mile End Road.</p> <p>b. Heights should not exceed the ridgeline of the church to maintain the primacy of the church tower and spire.</p> <p>c. Development should not exceed the existing building line to preserve views of the church.</p> <p>d. Street frontages of future development should be harmonious with the existing historical facades to maintain the character of the street.</p>

Supporting text

14.152 This policy aims to ensure that important views within, into, and across the borough are preserved through appropriate management of development. This is in line with the council's statutory duties to protect heritage assets, the requirements of the London View Management Framework, and the requirement of the London Plan for boroughs to identify important local views in their local plans.

14.153 Views are important elements of townscape and local character, and can provide a positive image of the borough, enhance legibility, and increase the pride that residents feel in their local area. Townscape views can be valued for a variety of reasons, but often the most valued views will feature a prominent landmark building that terminates a vista, acts a focal point, or establishes some other form of spatial hierarchy and ordering. Such landmarks help to define and identify places and are considered to be a key component of high-quality urban design.

14.154 New developments are expected to make a positive contribution to the skyline, including in their use of palette and texture, in particular where these buildings will have an impact on long-distance views.

14.155 This policy identifies a skyline of strategic importance which is observed from multiple locations within and outside the borough, and a series of views and landmarks of a borough-wide importance.

14.156 Part 1(a) refers to strategic views identified in the latest versions of the London View Management Framework and Tower of London and Maritime Greenwich World Heritage Site Management Plans which have impacts on developments within Tower Hamlets.

14.157 Part 1(b) refers to the group of tall buildings around Canary Wharf

that form a distinctive cluster, referred to as the 'skyline of strategic importance' (SSI). This cluster is visible across London and has become a globally recognised silhouette. The distinctive skyline is a prominent and recognisable feature in views from the surrounding areas, which are of a much smaller scale. The area of skyline of strategic importance covers the Canary Wharf tall buildings zone (zone B), as shown on the policies map and set out in Policy PS2. Building heights within the designation area should highlight the central emphasis of the SSI at One Canada Square, and step down towards its boundaries in line with Policy PS2, to ensure a consistent and coherent skyline. The heights in the setting of the skyline of strategic importance should be consistent and significantly lower than the buildings at the edge of the designation area.

14.158 Part 1(c) refers to borough designated landmarks, which are prominent buildings of high architectural and/or cultural value that can be seen in views to and from a number of places within the borough, including conservation areas. These views are referred to as borough designated views. Development should be tested against their impact on the prominence of borough designated landmarks in borough designated views. Intrusive development (as defined in the glossary) that competes with the prominence of borough-designated landmarks in the backdrop of the borough-designated views or obscures them at the mid or foreground will need to be reconsidered to reduce its intrusiveness. The council has prepared a Views and Landmarks Study that explains the significance of the borough landmarks and sets out guidance for future development within the setting of the landmarks. Proposals within these areas should demonstrate that they have taken account of this guidance.

14.159 Part 1(d) seeks to shape and manage the impact of development on views identified in the Conservation Area Character Appraisals and

Management Guidelines covering each of the borough's 58 conservation areas. Development that is harmful to the special character of these views will be resisted.

14.160 Part 1(e) recognises that water space and open space are intrinsic elements of the borough's identity and that their presence is an essential element of the character of a place. Development should

14.161 therefore avoid severing visual connections between the existing public realm and water or open spaces; and should aim to provide enhanced visual connections to water or open spaces through the layout and design of the development. Developments located adjacent to water or open spaces, or on streets in their direct vicinity which are parallel and perpendicular to them, should afford views and glimpses of these sites from the street level.

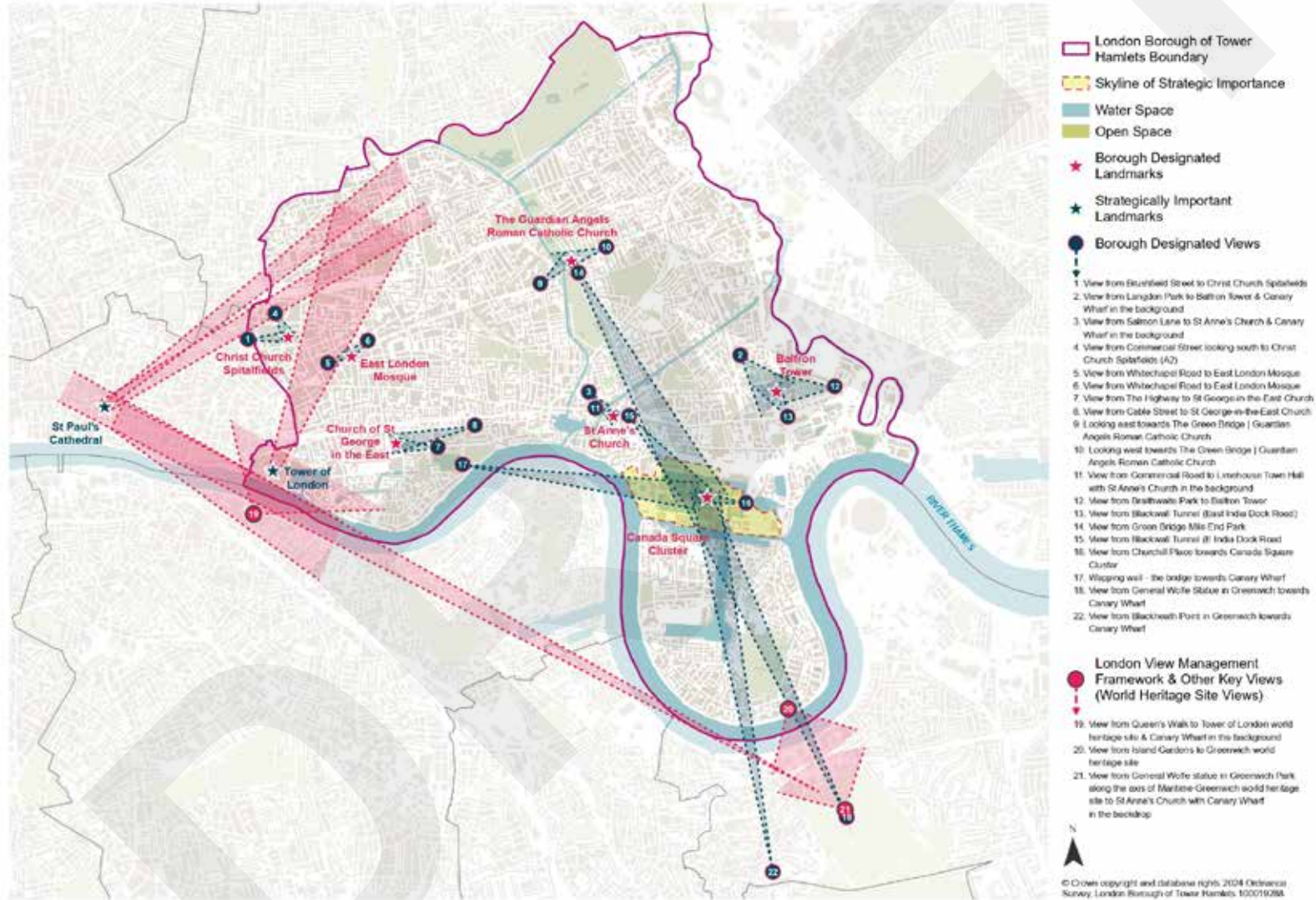
14.162 Part 1(f) seeks to shape and manage the impact that development would have on townscape and local views that are important to the identity of Tower Hamlets and its unique places. These will be identified on a case-by-case basis through the townscape and visual impact analysis in relation to a particular development. Due to relatively flat topography, tall buildings located in the borough can

14.163 be seen from significant distances. It is therefore important that tall buildings positively contribute to the legibility, character, and spatial structure of the borough's 24 places.

14.164 Part 2 sets out principles for development within close proximity to the borough-designated landmarks or within their sightlines. These principles have been derived from the Views and Landmarks Study developed as part of the plan's evidence base, and ensure that views of these important landmarks will be protected.

Figure 15: Protected views

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London Plan polices:

- HC1 Heritage conservation and growth
- HC3 Strategic and local views
- HC4 London View Management Framework

Local Plan policies:

- BO2 Open spaces and the green grid network
- BO3 Water spaces

Evidence base:

- Views and Landmarks Study, 2024
- Conservation Strategy, 2023
- Tower of London World Heritage Site Management Plan, 2016
- Maritime Greenwich World Heritage Site Management Plan, 2014
- London View Management Framework SPG, 2012
- Conservation Area Character Appraisals and Management Guidelines

Policy PSg Shopfronts

1. New or replacement shopfronts are required to be robust and well-designed and meet the following requirements:

- a. The retention of historic shopfronts or features of architectural quality or interest, which may include signage. These elements should be retained, refurbished, and sympathetically incorporated into new development or changes of use. Lost features which are characteristic of adjoining properties should be reinstated;

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shopfronts should remain active, with large, generous shop windows, adequate entrance doors, good proportions, and careful detailing;

a sensitive relationship between the shopfront and the upper floors is created, by ensuring that the new shopfront integrates well into the host building, and respects its scale, style, age, and character;

- d. a sensitive relationship with surrounding shopfronts and buildings;
- e. use robust and durable materials which are appropriate to and enhance the local character of the building and townscape. Where the shop is a heritage asset, appropriate heritage materials will normally be expected, including timber framing;
- f. that shopfronts are designed in a way that is flexible and adaptable to alternative uses;
- g. the provision of level entrances where possible – where ramps are required, they should be internal, unless exceptional circumstances apply. Materials and finishes of ramps should be

appropriate and of high quality;

- h. maintain or include independent access to upper floor accommodation from the street frontage as part of an integrated design;
- i. clearly incorporate the street number; and
- j. ensure security measures are integral to the overall design to avoid the need for retrofitting external shutters.

2. Shop signage should:

- a. be accommodated solely within a defined fascia above the façade. Fascia signage should not noticeably exceed one-fifth of the height of the ground floor accommodation;
- b. not be excessive, visually discordant, overly large, project excessively forward or extend the façade above the ground floor level;
- c. be defined by permanent, integrated architectural detailing;
- d. be restricted to one fascia above each shop window and one projecting or hanging sign per façade. A hanging sign should not exceed 600mm x 600mm x 80mm and should be at least 2.4m above the footway;
- e. if required, illumination should be incorporated in a discreet and sensitive manner without overly dominant fittings, clutter, or cables. Lighting should be limited to the advertisement element (logos and words), and not the full width of the fascia; and
- f. where significant historic fascia signage is present, it should be preserved, and proposals for changes to the shopfront should be designed to accommodate its retention.

Supporting text

14.165 This policy seeks to ensure that shopfronts are attractive, well designed and make a positive contribution to the surrounding streets, spaces and public realm and thereby enhance the overall character and appearance of the borough.

14.166 Part 1 of the policy sets out the requirements for all new or replacement shopfronts. Heritage elements of shopfronts should be retained and enhanced in line with policy PS6, and should provide active frontages onto streets in line with policy PS4. Shopfronts which form part of a group of original shopfronts and/or are designated heritage assets or within conservation areas should be of a traditional design and incorporate traditional features and character, and use traditional materials. Such developments should avoid the use of neon lighting, animated electronic displays, and external solid shutters.

14.167 Shopfronts should incorporate a well-defined frame, including location of signage, stall-riser, door and window units which sit in a defined architectural surround, use appropriate high quality, sustainable materials and be of a scale which relates to the upper floors of the building and complements the quality and character of surrounding buildings.

14.168 Achieving a sensitive relationship between the shopfront and its surroundings means, for instance, that shopfront fascias should be within the width of a single building and should not extend above the ground floor or obscure architectural features of value. On a historic building, the fascia sign height shall be dictated by any prevailing original pilaster detailing. On new-build development, a projecting band or cornice should be built into the façade to clearly demark a line between the fascia and the floor above.



14.169 The introduction of planning use Class E has provided a significant amount of flexibility for town centre uses. The design of shopfronts should take into account this potential flexibility, and should be designed to be adaptable to plausible alternative uses. This could include a consideration of how to sensitively incorporate flues into the façade if the building is converted into a use that includes food production in the future.

14.170 Shopfront design should be an integral part of the design process with consideration given to how security measures are incorporated to maintain active frontages at all times. 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.

14.171 Consideration should be given to the potential for including energy efficiency measures into the design of shopfronts, where these would be appropriate within the context. This could include double glazing, natural ventilation features, or awnings to provide shade.

14.172 Part 2 of the policy relates specifically to the requirements of shop signage, which should be carefully designed and located to contribute positively to the townscape.

14.173 In relation to part 2(f), historic signage provides valuable insight into a building's history and an area's social and economic development. Where historic signage with heritage significance needs to be preserved, it may be appropriate to consider placing the new signage within the shop window to enable this.

Local Plan polices:

- TC2 Protecting the diversity, vitality and viability of our town centres
- TC3 Town centre uses outside our town centres
- TC5 Food and drink
- TC6 Entertainment uses
- TC7 Evening and night-time economy

Evidence base:

- Shopfront Design Guide, 2024
- Conservation Area Character Appraisals and Management Guidelines



Policy PS10 Advertisements, hoardings and signage

1. Advertisements, hoardings, and signage must be well-designed and well-integrated within the public realm, host buildings and the surrounding area. Proposals will be supported where they demonstrate how they:
 - a. complement the character, appearance and visual amenity of the site and the surrounding area;
 - b. do not have an adverse impact on the setting or significance of heritage assets (including conservation areas and listed buildings) and do not obscure architectural features;
 - c. do not intrude into the outlook of nearby residents;
 - d. do not adversely affect public or highway safety or impede pedestrian access, including for those with visual impairment or impaired mobility;
 - e. enhance the visual amenity of construction sites and vacant or underused sites/buildings and the surrounding area, including through the use of appropriate lighting;
 - f. are subservient in relation to the streetscape or the buildings to which they are attached;
 - g. do not create or contribute to a proliferation of signs and advertisements which cause physical or visual clutter in the streetscape; and
 - h. minimise light pollution and intrusive lighting infrastructure.
2. Within conservation areas, advertisements, signage, and hoardings should:
 - a. complement the special character of the area;
 - b. not be above fascia or ground level;
 - c. be externally illuminated; and
 - d. Restrict projecting or hanging signs to one per frontage.
3. Applications for telephone kiosks which have display panels for advertisements (whether electronic or non-electronic) and are located within 400m of a school will only be permitted where there is a condition or other agreement with the council in place to restrict the advertising of high fat, salt, and sugar (HFSS) products.
4. Applications for telephone kiosks will only be supported where they do not create a distraction hazard for road users or pedestrians, lead to excessive visual clutter in the streetscape, or create an inappropriate restriction on the amount of space available to pedestrians

Supporting text

14.174 This policy aims to ensure advertisements, hoardings and signage positively activate the streetscape and enhance the visual appearance of their host buildings or structures.

14.175 Part 1 provides guidance on the appropriate design and settings of advertisements, hoardings and signage (including fascia and hanging shop signs, A-boards, poster panels, digital billboards and free-standing advertisements).

14.176 The council recognises that well-designed features in the streetscape can make a positive contribution to the public realm and play an important role in providing local information and supporting local businesses. However, poorly designed, excessive, or overly dominant features can have negative impacts on the character and appearance of their surroundings and can create hazards for pedestrians and traffic.

14.177 Advertisements, hoardings, and signage should be in keeping with the character of the area and should not negatively affect the amenity of surrounding properties or highway/public safety. There is a particular need to avoid physical and visual clutter in the streetscape as well as problems arising from distraction among road users and pedestrians. For instance, the location of A boards in areas where the width of the footway is less than 2 metres will be resisted. Poster panels/freestanding adverts will generally be out of place within residential areas due to their scale, size, and intrusive nature.

14.178 External illumination for signage will need to be carefully considered at an early stage in the design process to ensure that lighting can be sensitively incorporated, where required.

14.179 Provision of public artwork or other visual concepts on hoardings will be supported and encouraged, where it can enhance the local streetscape and improve the appearance of construction sites.

14.180 Part 2 provides guidelines for advertisements, signage, and hoardings in conservation areas. The design should complement the historic character of the conservation area in terms of scale, location, composition, and materials applied. In some cases, projecting or hanging signs may need to be raised above the fascia to retain the historic features. In other instances, the height of some traditional shopfronts means projecting or hanging signs may need to be placed higher for safety reasons. Any lighting associated with advertisements, signage or hoardings should be discreet and well placed so that it does not interfere with the visual amenity of the historic environment. External lighting should generally be used within conservation areas rather than internal illumination, due to the potential impact on heritage assets; but proposals for such lighting will still need to be carefully considered in the design process to ensure they are sensitively incorporated into the area.

14.181 Part 3 aims to control the presence of unhealthy advertising in the vicinity of schools, in line with the council's adopted healthy advertising policy. Telephone kiosks are increasingly used as a method of displaying advertising, but due to recent changes to the General Permitted Development Order are no longer considered to be permitted development and now require planning permission. Within 400m of a school, this permission will only be granted where a condition can be placed on the permission (or some other form of acceptable agreement can be reached) to not allow the advertising of high fat, salt, and sugar (HFSS) products. This is to reduce the exposure of children and young people to HFSS advertising, which can negatively impact their health.

14.182 Part 4 of the policy also sets out general criteria for the placement of telephone kiosks.

London Plan policies:

- D8 Public realm

Local Plan policies:

- EG2 New employment space
- TC2 Protecting the diversity, vitality and viability of our town centres
- TC3 Town centre uses outside our town centres
- TC5 Food and drink
- TC6 Entertainment uses
- TC7 Evening and night-time economy
- TC8 Short stay accommodation
- MC1 Sustainable Travel
- MC2 Active travel and healthy streets
- MC3 Impacts on the transport network

Evidence base:

- Spatial Planning and Public Health Needs Assessment, 2023
- Signs and Advertisements Guidance Document
- Conservation Area Character Appraisals and Management Guidelines



Policy PS11 Siting and design of telecommunications infrastructure

1. Where new sites are proposed for the installation of telecommunications equipment, it must be demonstrated that co-location or mast-sharing on existing telecommunications installations has been explored and is not possible.
2. The installation of new telecommunications apparatus is required to minimise its impact on the street scene and townscape and not unacceptably harm the appearance of heritage assets or unacceptably detract from the amenity of surrounding properties.
3. Telecommunications equipment installed on tall buildings should be integrated into the building design to minimise the impact of its appearance. Where telecommunications equipment protrudes above the top of a building's roofline, this will be included in the calculation of the building's height and may trigger requirements relating to tall buildings.
4. The installation of telecommunications equipment must not create any unacceptable risks to the health, well-being, or security of residents or users of surrounding and nearby sites.

Supporting text

14.183 This policy aims to ensure that the design and location of telecommunications equipment does not create a safety hazard or detract from the character of their surroundings, taking into consideration the potential impacts on the amenity of the area and local residents.

14.184 Under part 1, proposals to install new telecommunications equipment will be required to submit a written report alongside the planning application demonstrating that efforts have been made to source compatible equipment to existing installations and to identify opportunities for co-locations. Where co-location is not possible, the report should clearly set out the efforts that have been taken, and the reasons why co-location is not feasible.

14.185 Part 2 aims to ensure that the installation of telecommunications equipment does not conflict with the general design, streetscape, and heritage requirements of other policies in this section of the Local Plan.

14.186 Part 3 should be read in conjunction with Policy PS2 on tall buildings. The design of tall buildings needs to be of especially high quality due to their potential impact on the townscape of the borough, and telecommunications equipment has the potential to detract from this design unless it is carefully considered.

14.187 Under part 4, details should be included on the frequency modulation, power output and evidence of how the proposal meets the International Commission on Non-Ionising Radiation Protection to demonstrate compatibility with surrounding uses.

14.188 The council will carry out further work in conjunction with mobile operators and developers to create a Public Realm Mobile Telecom

Design Framework which will address design, type of structures, access, and safety. This will require that, prior to approval, future public realm designs must accommodate a 5G small cell capability.

London Plan polices:

- D9 Tall Buildings
- D11 Safety, security and resilience to emergency

Local Plan polices:

- CG10 Noise and vibration

Evidence base:

- Conservation Area Character Appraisals and Management Guidelines

15. Inclusive economy and good growth

EG1 – Creating investment and jobs

EG2 – New employment space

EG3 – Affordable workspace

EG4 – Loss and redevelopment of employment space

EG5 – Railway arches

EG6 – Data Centres



Introduction

15.1 Tower Hamlets has a strong tradition of entrepreneurialism, playing host to some of London's oldest markets. The borough's industrial sites play host to a diverse range of businesses, from food production to building suppliers to clothing manufacturers. The borough's wide variety of office spaces house many small businesses from accountants and solicitors that serve their local neighbourhood to growing enterprises with markets across London and beyond. The local economy is essential to tackling economic inequality and the skills gap. It provides employment, training, and career progression opportunities to local residents.

15.2 Tower Hamlets also plays a significant role in London's global economy. The west of the borough forms part of the CAZ (see Figure 16) which contains London's core functions and activities, such as government administration, culture, and business. Canary Wharf and the surrounding area, located in the north of the Isle of Dogs, is classified as a CAZ Satellite by the London Plan and contains some of the world's largest financial and professional service organisations. In addition to supporting London's economy, these businesses also play an important role in providing employment opportunities to local residents.

15.3 The past few years have seen a significant change in the use and nature of employment space in the borough. The COVID-19 pandemic has hastened national trends that were already in evidence, including an increase in working from home and in e-commerce. This shift is still ongoing, and it remains to be seen to what extent these trends will become permanent.

15.4 While there has been a reduction in demand for large offices spaces suitable for global and national corporations, particularly in

Canary Wharf, there remains strong demand for smaller spaces suitable for local independent businesses and start-ups. Over the past few years, the demand for local independent business and start-up workspace has spread from a cluster in the west of the borough around Whitechapel and Spitalfields to cover most areas of the borough.

15.5 Over the past several years, the UK has also seen a significant increase in demand for industrial spaces, with especially strong demand for logistics facilities to support the increase in e-commerce. While this trend began before the pandemic, the lock-downs and changed behaviours around visiting shops led to a rapid acceleration in online shopping, which requires significant warehousing and logistics space. This rise in demand for industrial space comes at the end of a long period in Tower Hamlets and London more widely of converting industrial land to residential and other uses. As a result, the pressure on the borough's remaining industrial land is significant, leading to higher rents that undermine the affordability of workspace for local businesses and entrepreneurs.

15.6 Table 6 presents the projected growth in employment within Tower Hamlets over the period 2023 to 2038.

15.7 Table 7 applies the projected change in jobs in the borough to the need for floorspace, demonstrating that there is sufficient supply of sites identified for future office floorspace. There is however a shortfall of industrial floorspace compared to demand as a result of significant losses of industrial land in the borough in recent years and the displacement of businesses into the borough from the City of London and other inner London boroughs where they have been forced out by higher rents and land values. As such, it is vital that existing provision is protected and that new floorspace is encouraged in appropriate locations to service the needs of local industry as well as the needs of central London more widely.

Table 6: Jobs forecasts: 2023 to 2038

Jobs	2023	2038	2023-38	2023-38
All jobs	326,629	359,896	33,267	10.2%
Office jobs	188,044	206,852	18,808	10.0%
Industrial jobs	15,753	16,905	1,152	7.3%

Table 7: Floorspace (sqm) forecasts: 2023 to 2038

Property type	Jobs change	Density ratio (sqm/worker)	Net additional floorspace (sqm)	Land required (ha)
Manufacturing	-400	36	-15,200	-3.8
Other Industrial	1,500	36	52,700	13.2
Distribution	100	50	5,500	0.8
Office	18,800	11.3	212,500	6.1
Total land				16.3

15.8 While the industrial projections cannot be met from identified sites in the development pipeline, potential additional capacity exists within designated employment locations through the intensification of existing provision. There are also numerous opportunities for new employment floorspace to be delivered through 'windfall' sites, generally through mixed-use developments across the borough and in the site allocations listed in Section 4.

15.9 This chapter relates to employment uses within the E(g) and B use classes (business, general industrial and storage and distribution) and

sui generis industrial functions (including 'dark kitchens', commercial laundries, etc.). While it is recognized that other use classes generate employment, these are covered within other policy chapters in the Local Plan.

15.10 This chapter also relates to many of the spaces where culture is produced, including film studios, set workshops, recording studios and visual artists' studios, among many others. Where spaces include both the production and consumption of culture, the policies in this chapter will apply alongside Policy CI5.

15.11 This section contains the following policies:

- Policy EG1: Creating investment and jobs
- Policy EG2: New employment space
- Policy EG3: Affordable Workspace
- Policy EG4: Loss and redevelopment of employment space
- Policy EG5: Railway arches

Policy EG1 Creating investment and jobs

1. The council will support development proposals which provide opportunities to maximise benefits to local independent businesses (small and micro enterprises) and local residents, delivering investment, providing a range of skills training opportunities and enabling job creation in the borough through:
 - a. reinforcing the borough's designated employment locations, in which development proposals must demonstrate that the role and function of the designation will be maintained and enhanced;
 - b. supporting local traders, entrepreneurs, start-ups, micro, and local independent businesses with access to affordable workspace options across the borough;
 - c. ensuring that the benefits of the new Elizabeth Line, including the stations at Whitechapel and Canary Wharf and other transport schemes will act as a further catalyst for investment and growth in the borough;
 - d. supporting and promoting the competitiveness, vibrancy, and creativity of the Tower Hamlets economy;
 - e. protecting the borough's global, national, regional and local economic roles in delivering jobs and supporting businesses;
 - f. ensuring a range of job opportunities at all levels are provided throughout the borough, particularly within designated employment locations, the CAZ, Tower Hamlets Activity Areas and Metropolitan, District and Neighbourhood Centres;
 - g. closing the current skills gap and wealth inequalities amongst the working population, through improving access to careers

and social mobility, education, training and development opportunities for residents and local businesses and increasing the mix of employment sectors; and

- h. ensuring availability of a range of workspaces and unit sizes, start-up space, co-working space and 'grow-on' space by protecting existing floorspace and encouraging the provision of new floorspace for a range of employment uses.

2. The council will support, protect, and enhance the role and function of the borough's designated employment locations (as defined on the Policies Map) and ensure that the provision of employment floorspace contributes to the borough's target of creating 33,267 new jobs over the period to 2038 in line with the roles and functions as set out below.

Table 8: Designated office locations

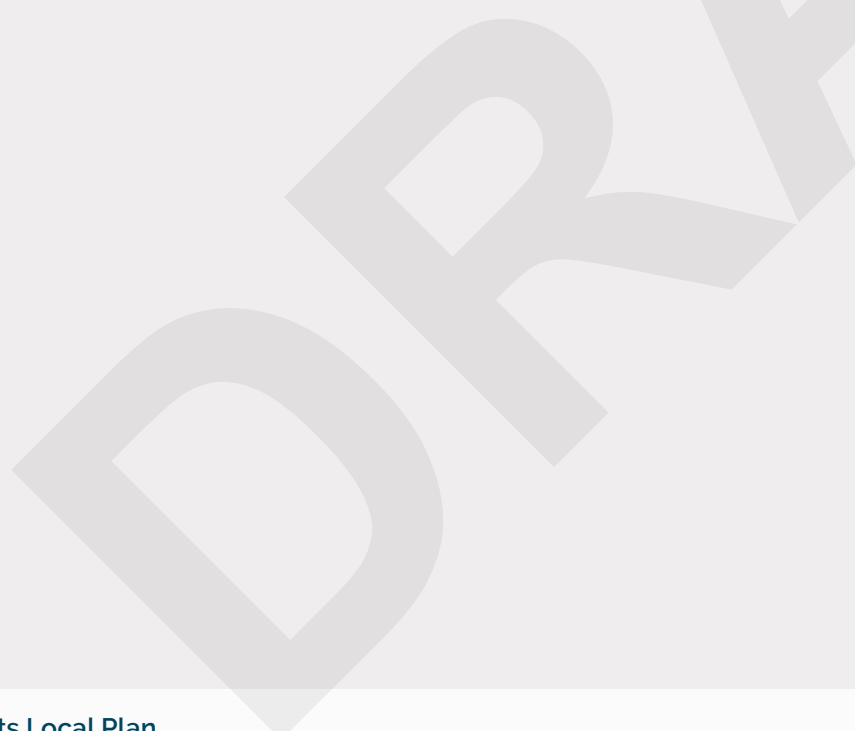
Designation	Role and function	Location
Canary Wharf Preferred Office Location (CW POL)	This area is a globally significant location for financial and business services. It will also expand and diversify its workspace to support local independent businesses and emerging industries. Canary Wharf's unique contribution to London's employment and economy should be promoted and enhanced. Residential development is only appropriate within the Canary Wharf Preferred Office Location (CW POL) where it comes through the retrofit of existing buildings and it does not undermine the supply of office space to meet the objectively assessed need as set out in Policy EG4.	Canary Wharf (as illustrated on the Policies Map)
Canary Wharf Fringe	Within the North Isle of Dogs CAZ Satellite, but outside of the CW POL, offices and other strategic functions are to be prioritised. In the CW Fringe, residential uses should not exceed 75% of the gross floor area of any development.	Area surrounding Canary Wharf (shown in Policies Map)
City Fringe Preferred Office Locations (POLs)	These contain, or could provide, significant office floorspace to support the role and function of wider Central London. Greater weight is given to office and other strategic CAZ uses as a first priority. Although residential uses can be accommodated, these should not exceed 25% of the gross floor area of any development.	These are illustrated on the Policies Map

Designation	Role and function	Location
Central Activities Zone (CAZ)	This designation contains areas of the CAZ outside of the POLs. They include a greater diversity of uses than the POLs, while providing significant employment floorspace and capacity to accommodate future growth. There are opportunities for provision of office and other strategic CAZ functions as part of employment-led or mixed-use schemes. Residential uses are supported as part of mixed-use schemes although the proportion of residential floorspace should not exceed 75% of the gross floor area of any development.	This is illustrated on the Policies Map

Table 9: Designated industrial locations

Designation	Role and function	Location
Strategic Industrial Location (SIL) PSP0804	This designation plays an important sub-regional industrial, warehousing and waste management role serving not just the borough but other parts of central London. Residential uses are not suitable in these locations due to potential conflict with existing and future industrial uses, and the pressure on industrial sites from high demand. These areas should be retained in industrial (Class E(g)(iii) or Class B) uses.	Empson Street (as illustrated on the Policies Map). This should be safeguarded in accordance with London Plan policies. Fish Island/Bow Goods Yard – This area currently falls within the LLDC’s planning authority, but planning powers for this area will return to Tower Hamlets from 2025. This area includes the Bow Midland Rail Freight Terminal, which is safeguarded for freight transfer. It will be safeguarded in accordance with London Plan policies.

Designation	Role and function	Location
Local Industrial Locations (LIL)	<p>LILs provide important areas of light-manufacturing/ industry and warehousing to meet a more local need and provide local employment opportunities, as well as to support the needs of the global business centres of Canary Wharf and the City of London.</p> <p>Residential uses are not suitable in these locations due to potential conflict with existing and future industrial uses, and the pressure on industrial sites from high demand. These areas should be retained in industrial (Class E(g)(iii), Class B, or industrial Sui generis) uses.</p>	<p>Blackwall Trading Estate Gillender Street Poplar Business Park The Highway Thomas Road Cannon Workshop Wick Lane and Crown Close, Fish Island These are illustrated on the Policies Map.</p>



Designation	Role and function	Location
<p>Local Mixed-use Employment Locations (LMEL)</p>	<p>These are areas of high accessibility that provide or could provide significant capacity for employment accommodation meeting secondary, local or specialist employment needs, and to support the needs of start-ups, small-to-medium enterprises, grow-on space, and creative and digital industries. They are generally suitable for a wider range of uses than Preferred Office Locations and CW Fringe, and may include light industrial and/or residential uses alongside traditional office uses. Residential uses will be supported in these locations where they meet the criteria of Policy EG4.</p>	<p>Blackwall – which provides secondary large floorplate offices and, smaller units suitable for small-to-medium enterprises which support the needs of Canary Wharf and the City of London. This area has seen significant growth in the higher education sector, and is particularly suited to this type of use, given its good public transport connections and campus-like public realm. This area also includes a significant cluster of data centres that provide storage and data processing for businesses in Canary Wharf and the City of London.</p> <p>Cambridge Heath – which provides a range of office, industrial and studio workspaces meeting the needs of businesses serving a more local need, start-ups, small-to-medium enterprises, and creative industries.</p> <p>Tower Gateway East – which provides a variety of units supporting both local need and the needs of businesses within surrounding POLs and the City of London.</p> <p>Whitechapel – which provides small office spaces meeting local needs alongside a bio-tech and life sciences sector, creative and knowledge-based industries and growing demand from an eastwards expansion of the City of London.</p> <p>These are illustrated on the Policies Map.</p>

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Designation	Role and function	Location
Creative Enterprise Zone (CEZ)	<p>The Hackney Wick and Fish Island Creative Enterprise Zone (CEZ) contains a significant cluster of businesses working in the creative and cultural sectors. Development in this area will prioritise workspace that supports the creative industries and will have regard to Part C of London Plan Policy HC5.</p> <p>The CEZ also includes a significant warehouse living community that relies on informal spaces to both live and carry out creative production work. This space will be protected as both housing and employment space on the basis that it meets needs for both types of use.</p>	The Hackney Wick and Fish Island CEZ is an area in the northeast of the borough. Historically, it was nearly entirely industrial but has become a mixed-use community with a large arts sector. The CEZ also extends into the London Borough of Hackney.
Safeguarded Wharves	Tower Hamlets includes two safeguarded wharves as designated by the London Plan. While these locations are not considered designated employment locations, they do play an important role in the borough's economy by allowing heavy goods to be transported by water.	Orchard Wharf Northumberland Wharf

Designation	Role and function	Location
<p>Railway Arches</p>	<p>Railway arches house a wide range of industrial and other employment uses across the borough. They often provide lower-cost space than would be available in a purpose built building, and play an important role in the borough's economy. Where they are in employment use (use classes E(g), B2, B8 and Sui generis employment uses), this will be retained and development that includes or is adjacent to railway arches will retain access and not undermine the flexible use of the arches.</p> <p>Railway arches can also provide space for community uses and other forms of social infrastructure.</p>	<p>Shadwell-Mile End Arches – these arches are underneath the railway line into Fenchurch Street, extending from Lemn Street to Bow Road (including under the disused railway line alongside Tidworth Street) and contain a diverse range of uses, including a particular cluster of South Asian food wholesalers in Watney Market.</p> <p>Bethnal Green Arches – these arches are underneath the lines into Liverpool Street, extending from Vallance Road to Regent's Canal to the north and Globe Road to the east. These arches contain a diverse range of uses, including a cluster of arts and culture uses around Cambridge Heath.</p> <p>These are illustrated on the Policies Map.</p>

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Table 10: Other Employment Designations

Designation	Role and function	Location
<p>Tower Hamlets Activity Areas and District, Specialist and Neighbourhood Centres</p>	<p>The Tower Hamlets Activity Areas, District Centres and larger Neighbourhood Centres also provide opportunities for office and other employment uses within existing and new buildings.. The Activity Areas in particular have the potential to accommodate substantial employment growth to support the strategic role of the POLs and other parts of the CAZ. These are illustrated on the Policies Map. Tower Hamlets Activity Areas and District and Neighbourhood Centres typically contain a diverse range of office and other workspace types and scales, therefore they are particularly well-suited to providing workspace suitable for local independent businesses.</p>	<p>The Tower Hamlets Activity Areas act as zones of transition between the high-density, business-oriented environments of the CAZ and Canary Wharf and the nearby residential communities. They typically include a mix of uses, including office, light industrial and residential and are generally suitable for mixed-use development including residential.</p> <p>District Centres serve the day-to-day needs of a large catchment area and can accommodate office development, typically at a smaller scale than the POLs, CAZ and Canary Wharf Fringe. These centres can also often accommodate light industrial uses away from the main shopping streets, where they support the vitality and viability of the centre (see town centre policies for more details).</p> <p>The Specialist Centres are town centres equivalent in scale to neighbourhood centres, but that include a unique cluster of businesses that attract visitors from a wider area. For the purposes of employment uses, Columbia Road should be treated as a neighbourhood centre. Redchurch Street includes small-scale offices that complement the ground floor uses, including creative businesses. New office development that supports the existing mix of uses will be supported. Hackney Wick includes a mix of town centre uses alongside light industrial and residential uses. Development of light industrial uses that are compatible with the existing mix of uses will generally be supported.</p> <p>Neighbourhood Centres serve the day-to-day needs of a smaller catchment and are likely to be suitable for more localised office uses.</p>

Supporting text

15.12 This policy sets out the approach to employment provision in relation to the level and distribution of jobs across the borough over the period to 2038. This will help to ensure successful and sustainable local and sub-regional economies, promoting and facilitating a range of employment spaces to meet the needs of different types of occupiers across different locations (see Figure 16 and the Policies Map).

15.13 Part 1 describes how development should contribute to meeting our long-term objectives to support investment and job creation in the borough. Tower Hamlets has a diverse economy ranging from the globally significant financial centre of Canary Wharf and the associated services required to support it (and the neighbouring City of London) to creative and cultural industries, industrial uses, secondary offices, and businesses, meeting a very local need. Employment activities are distributed across the borough with specific locations supporting clusters of particular businesses or unit types. Development that contributes to meeting these objectives will be supported.

15.14 Development is expected to help reduce wealth and social inequality and support local enterprise, employment, education, and skills development and the council's social value aims. This is to support residents to take advantage of the opportunities created by development, both during the construction and end user phase.

15.15 Planning obligations will be used to ensure developments contribute to this aim, including by making financial contributions which will be used by the council to fund training and support for residents and local businesses to access employment and enterprise opportunities resulting from development. The approach to calculating these contributions is set out in Appendix 2. In addition, developments

are expected to work towards targets for local employment and enterprise which will be secured by planning obligation, including providing education and skills opportunities (including apprenticeships, internships, work placements and graduate placements) during construction and occupation, where appropriate.

15.16 Part 1 also supports the provision of a range of workspaces including affordable workspace, emphasising that spaces suitable for small-and-medium enterprises and microbusinesses are a vital element of the overall mix. This has the dual benefit of supporting new and emerging economic sectors and providing additional space for small-and-medium enterprises and micro-businesses that provide employment for a significant proportion of the borough's population.

15.17 Development incorporating a range of unit types and sizes will be encouraged, including where these are clustered within a single building and provide shared and networking facilities. Developments should address the most up-to-date requirements as part of pre-application discussions.

15.18 Part 2 establishes the designated employment locations. We will work with applicants 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.

15.19 Canary Wharf and the City Fringe contain a high proportion of primary and large floorplate offices which form part of globally significant employment clusters. The existing office space in these areas will be protected to ensure that these areas continue to play a globally significant role. However, there has been a reduction in the demand for large-floorplate corporate offices, and a shift, particularly in Canary Wharf, towards a greater mix of employment space – with a significant

emphasis on space suitable for local independent businesses – and a greater mix of uses more broadly on the fringes of Canary Wharf will be supported. This will be achieved through the designation of the CW POL, the Canary Wharf Fringe and the City Fringe POLs.

15.20 The CAZ, which includes the London Plan designated North Isle Of Dogs (NIOD) Satellite (including Canary Wharf) has been subdivided into four distinct areas. The commercial core of the NIOD has been designated as the CW POL and is unsuitable for housing, unless it is delivered through the retrofit of existing buildings in line with circular economy principles and does not undermine the supply of office space to meet the objectively assessed need as demonstrated in the council's Employment Land Review or other council-approved document, or other uses which would undermine the strategic functions of the CAZ. The area surrounding the CW POL has been designated as the CW Fringe. In this area a greater mix of uses is supported, including residential up to a maximum limit of 75% of the floor area of any new development. The 75% maximum may be considered strategically across multiple sites where appropriate. The CW Fringe is also expected to support the function of Canary Wharf as a Metropolitan Centre, with a diverse variety of town centre uses.

15.21 The City Fringe POL covers areas that are key existing or potential employment locations with offices and other strategic functions as the dominant land use. However, in contrast to the CW POL, residential uses will be acceptable so long as they do not undermine the future supply of offices and other strategic uses. This approach seeks to ensure residential development does not prejudice the future intensification of employment floorspace or undermine the predominant employment

function of these areas. While there has been a reduction in demand for large format office space across London, this reduction has been less acute in the City and City Fringe than in Canary Wharf. As a result, there continues to be a need to safeguard space for offices, including large-floorplate corporate style offices, in the City Fringe. This ensures that the larger businesses moving east from the City do not displace smaller businesses occupying the existing office stock in the west of the borough.

15.22 The remainder of the CAZ which is outside of the City Fringe POL contains a more diverse range of uses than the Secondary POL and includes the borough's three CAZ Centres, which function as town centres. Within this zone, proposals should consist of or provide a significant amount of employment floorspace or other strategic CAZ uses relative to the surrounding context of the site. Other uses which may include residential will be encouraged where the residential component of a scheme does not exceed 75% of the gross internal floor area. This will ensure that the area retains its mixed-use character, and that smaller-scale office space continues to be provided that meets the needs of local independent businesses in highly accessible locations.

15.23 Tower Hamlets has a relatively limited supply of industrial land and floorspace, despite high levels of market demand, in the face of increasing competition from other land uses, such as housing. There are clusters of existing industrial activity along key transport routes. These sites need to be protected to support the long term needs of the borough and the role of the City of London and Canary Wharf as global economic hubs (some services need to be in close proximity to the end user and immediately available). This will be achieved through the

designation of the Strategic Industrial Locations (Empson Street and Fish Island/Bow Goodsyard) and Local Industrial Locations (see Part 1).

15.24 For the purposes of this chapter, industrial uses are considered to include:

- light and general industry (use Classes E(g)(iii) and B2);
- storage and logistics/distribution (use Class B8);
- secondary materials, waste management and aggregates (use Classes B2, B8 and Sui Generis);
- utilities infrastructure (such as energy and water);
- land for sustainable transport functions including intermodal freight interchanges, rail, and bus infrastructure;
- wholesale markets;
- emerging industrial-related sectors;
- flexible hybrid space to accommodate services that support the wider economy and population;
- Low-cost industrial and related space for micro, small and medium-sized enterprises; and
- research and development of industrial and related products or processes.

15.25 The borough's Local Mixed-use Employment Locations (LMELs) have relatively high public transport accessibility levels and support significant numbers of jobs but have unique individual characteristics. Applicants should aim to ensure that new employment space that is brought forward contributes to and meets the business and workspace demands of each area. The Whitechapel LMEL forms part of MedCity and plays a particularly important role in the development of the Life Sciences and Medical Research sector, with the Royal London Hospital,

a campus of Queen Mary University London, and the potential for a new life sciences research centre. The Blackwall LMEL is experiencing an increase in higher education facilities, benefitting from the campus-like feel of the area, its proximity to student housing and its good public transport connections. New development within LMELs will be expected to provide high-quality flexible workspace designed to meet the needs of emerging and growing sectors (e.g. research and development) as well as other SMEs and creative businesses.

15.26 Hackney Wick and Fish Island have been designated as a Creative Enterprise Zone in accordance with London Plan Policy HC5. Within this area, creative workspace and cultural venues are supported, and there is particular emphasis on the provision of affordable workspace to support creative industries. In addition, the HWFI CEZ includes a significant Warehouse Living community, which relies on low-cost, communal spaces that provide both living accommodation and workspace. Warehouse Living provides both housing and employment and is therefore considered to be both a residential and an employment use.

15.27 In addition to the SILs and LILs, the borough's railway arches play an important role in providing relatively low-cost space for a very wide variety of uses including light industrial. These spaces will be protected through a railway arches designation that secures them for employment and other creative uses. The borough's railway arches also contain and can be suitable for community and cultural uses, such as sports facilities and art galleries. Where railway arches are in an existing community use, or a community facility is proposed within a railway arch, regard should be had to the Community Infrastructure policies.

15.28 Part 2 also highlights that town centres are locations in which employment uses will be supported, subject to the provision of active frontages at ground floor level, where relevant. This is because town

centres are located throughout the borough and are able to offer smaller spaces which meet the needs of businesses serving the local community. Within the Tower Hamlets Activity Areas and some District Centres and Neighbourhood Centres (as shown on the Policies Map), purpose-built office buildings can be supported where they are of a nature and scale which corresponds with their surroundings. Within the Primary and Secondary Frontages, employment spaces should be located on upper floors so as not to undermine the retail and leisure functions of those areas.

15.29 Proposals outside of designated employment locations and the town centre hierarchy (see Part 1) will be supported where they demonstrate that there is a need and demand for such employment uses, with further detail set out in Policy EG2.

London Plan policies:

- GG5 Growing a good economy
- SD4 The Central Activities Zone (CAZ)
- SD5 Offices, other strategic functions and residential development in the CAZ
- E1 Offices
- E2 Providing suitable business space
- E3 Affordable workspace
- E4 Land for industrial, logistics and services to support London's economic function
- E5 Strategic Industrial Locations (SIL)
- E6 Locally Significant Industrial Sites
- E7 Industrial intensification, co-location and substitution
- E8 Sector growth opportunities and clusters
- E11 Skills and opportunities for all

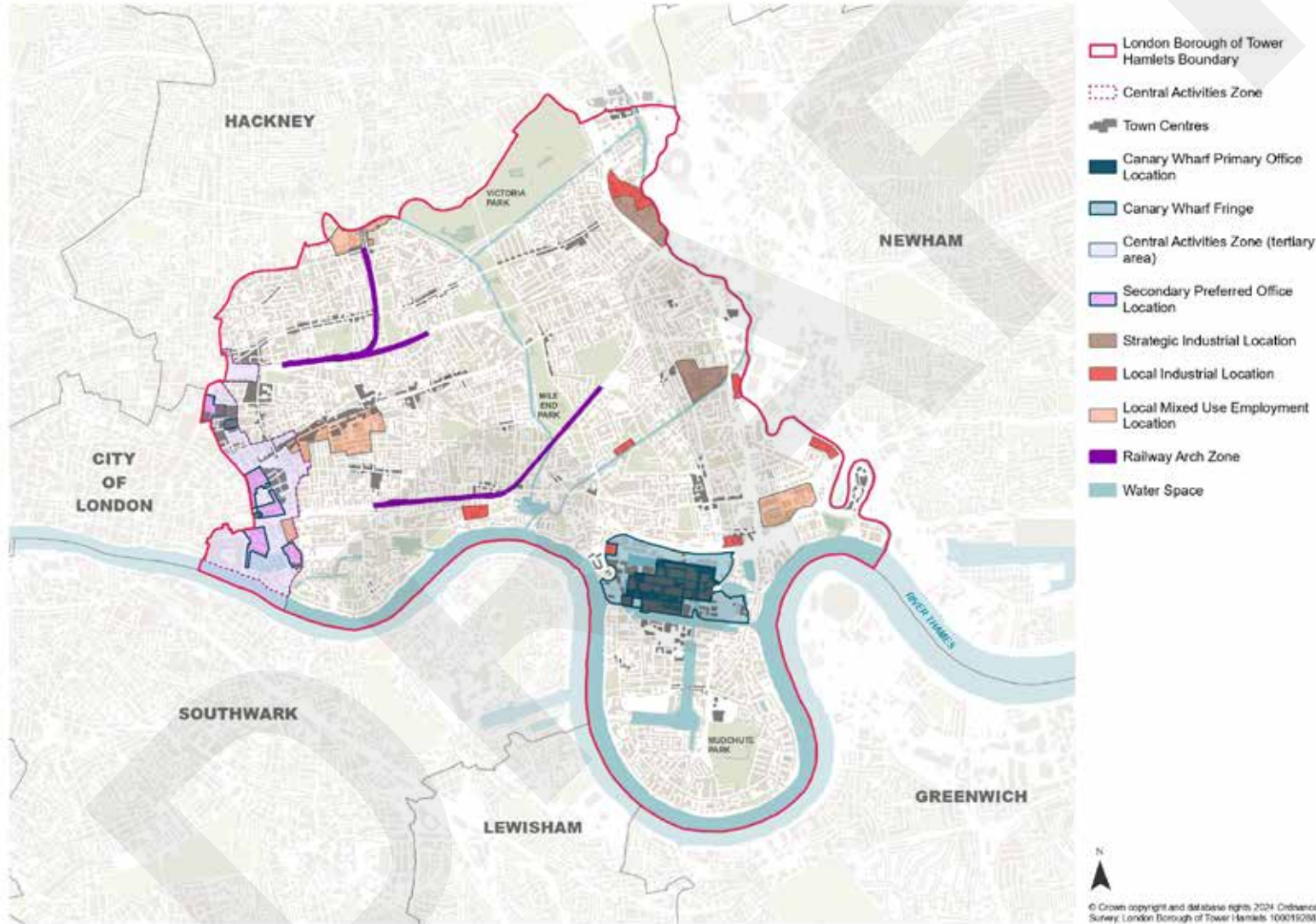
Local Plan policies:

- DV1 Areas of growth and opportunity within Tower Hamlets
- DV2 Delivering sustainable growth in Tower Hamlets
- CI5 Arts and culture facilities
- RW1 Managing our waste
- RW2 New and enhanced waste facilities
- MC1 Sustainable travel
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Tower Hamlets Employment Land Review, 2023
- Tower Hamlets Affordable Workspace Study, 2023
- Central Activities Zone SPG, 2016
- London Industrial Land Supply, 2023
- London Office Policy Review, 2017
- Central Activities Zone Economic Futures Research, 2021

Figure 16: Distribution of employment hubs and locations



Policy EG2 New employment space

1. Development proposals for new or intensified industrial floorspace (use classes E(g)(ii), E(g)(iii), B2, B8 and industrial Sui Generis uses) will be supported in Strategic Industrial Locations, Local Industrial Locations, Railway Arches, Site Allocations which include industrial space and the Creative Enterprise Zone (where they support the creative economy). Additionally, development proposals for new or intensified light industrial floorspace (use classes E(g)(ii) and E(g)(iii)) will also be supported in Local Mixed-use Employment Locations. Development proposals for Warehouse Living (Sui generis) floorspace will be supported in the Creative Enterprise Zone.

2. Development proposals for new or intensified office floorspace (use classes E(g)(i) and E(g)(ii)) will be supported in Preferred Office Locations, Local Mixed-use Employment Locations, the Central Activities Zone, Site Allocations which include office space and the Creative Enterprise Zone (where they support the creative economy).

3. Outside of the locations cited in Parts 1 and 2, development proposals for new employment space will be directed to town centres, having regard to the town centre hierarchy and the London Plan's Town Centre Office Growth Potential Classifications, the Tower Hamlets Activity Areas and locations with good public transport accessibility or along major transport routes.

4. Development proposals for new employment space will be supported at other locations to those specified in Parts 1-3 above where it can be demonstrated that there is a reasonable prospect of occupancy by way of a detailed marketing strategy, and:

- a. the employment use would contribute towards integrated place

making; or

- b. the area forms part of a cluster of similar employment uses; or
- c. the employment space is being provided as part of a temporary meanwhile use.

5. Development proposals for new employment space must ensure that it does not have a negative impact on the amenity of neighbouring residential dwellings or the operations of neighbouring businesses.

6. Planning conditions may be used to secure Classes E(g)(i), E(g)(ii), and/or E(g)(iii) within designated employment locations or on sites where other Class E uses would not be appropriate.

7. Development proposals for new employment space must demonstrate that:

- a. Where relevant, floorspace will allow for flexibility for a range of occupiers including future subdivision or amalgamation;
- b. Where relevant, they will provide a range of unit types and sizes including a significant proportion of micro- and small units well-suited to micro- and small independent businesses;
- c. they will provide a good level of amenity for occupiers;
- d. they will provide adequate servicing and delivery accommodation; and
- e. they incorporate the highest standards of inclusive design.

8. Development proposals for employment and residential use in the same self-contained unit (i.e. live-work and work-live) will not be supported, except in the form of Warehouse Living (Sui generis) in the Hackney Wick and Fish Island Creative Enterprise Zone.

Supporting text

15.30 Parts 1 and 2 of the policy encourage the provision of additional employment floorspace to meet demand and the needs of different business types. Where new provision is proposed, it must be located in the most viable locations to support the role and function of the borough's designated employment locations and to proactively avoid long-term vacancy or subsequent conversion to other uses. This policy seeks to direct new provision to the designated employment locations, activity areas and site allocations which include employment space as a first priority, then to locations of highest activity, accessibility and visibility (see Part 3) and finally to other locations (see Part 4) where it meets specific criteria.

15.31 Part 4 supports the development of employment uses outside of designated employment locations, provided they meet certain criteria. Part 4(a) supports employment uses where they serve a place-making function within a development, for example by activating inactive spaces or providing a focal point. Part 4(b) recognises that there are areas of the borough outside of designated employment locations that contain clusters of employment uses, and that these areas are likely to be suitable for new employment uses. Part 4(c) recognises the positive role that temporary uses can play in activating and making efficient use of spaces while they await development. In order to allow for flexibility and ensure that temporary uses can occupy spaces quickly, the policy allows flexibility for temporary employment uses to occupy spaces that might otherwise be considered unsuitable for employment uses, provided these uses do not have a detrimental impact on neighbouring amenity through, for example, noise or air pollution. Meanwhile uses would be expected to only remain in place for a defined period of time,

or until the site comes forward for development to meet its full potential or allocated use(s). Proposals for meanwhile uses should include a 'move-on' plan showing how the temporary use will move to a new suitable premise when a permanent occupier takes on the space or it is redeveloped. Where the application can demonstrate that the use is genuinely temporary in nature – meaning that there will be no loss of employment when the use ceases – a 'move on' plan may not be necessary.

15.32 Part 5 seeks to ensure that new employment development does not have a negative impact on the amenity of neighbouring residential dwellings, including as a result of noise, air and light pollution, odours, vibration or reduction in daylight, sunlight or privacy. It is also essential that new employment development does not undermine the operations of existing businesses, including ensuring that full access, operations, and servicing are maintained. Where existing businesses in close proximity to the development site have the potential to cause noise, pollution, or vibration issues, the proposed development must ensure that it is designed to mitigate these issues, in accordance with the London Plan's Agent of Change principle.

15.33 Part 6 recognises that designated employment locations play an important role in ensuring a future supply of land and floorspace to meet the borough's economic needs over the course of the plan period. The flexibility of use class E risks undermining that supply, so the policy supports the use of planning conditions that restrict changes of use.

15.34 Part 7 aims to prevent long-term vacancy caused by high fit-out costs and lack of supporting infrastructure deterring interest from potential tenants.

15.35 Part 7(a) promotes flexibility to minimise the risk of spaces becoming vacant and ensuring that they can adapt to changing market demands.

15.36 Part 7(b) seeks to ensure that space is provided to meet the needs of local independent businesses, which may require smaller spaces.

15.37 Part 7 (a) and (b) also recognise that flexibility may not be possible or desirable in all cases. Development proposals that are designed for a specific operator or a specific industrial use may not be able to provide flexibility or smaller units. Site constraints may also limit the ability of a development proposal to meet these criteria.

15.38 Part 7(c) promotes a working environment that supports the health and well-being of occupants. Development proposals should demonstrate that they include adequate levels of daylight and sunlight and access to ancillary communal facilities for smaller occupiers such as meeting rooms, breakout spaces, and kitchen facilities.

15.39 Part 7(d) seeks to ensure that the delivery and servicing needs of the occupiers can be met within the proposed development.

15.40 Development proposals should include off-street loading where necessary, and demonstrate that they can meet the needs of a range of occupiers and have sufficient clear ceiling heights and goods lifts and can handle heavy loads.

15.41 Part 7(c) requires developments to be designed to be inclusive for occupiers with mobility constraints, including ensuring that all workspaces are accessible to those with mobility constraints, sufficient Blue Badge parking is provided to meet the requirements of London Plan Policy T6.5, and ensuring that there are no potential conflicts

between the Blue Badge parking and the servicing and delivery accommodation.

15.42 In the case of office developments, high-speed broadband connectivity should be provided to serve the end-user. Industrial units would be expected to provide double-height units with appropriate access and good standards of internal sound insulation to minimise conflict with surrounding uses.

15.43 Part 8 recognises that, in most parts of the borough, live-work units do not contribute to the overall provision of employment floorspace and are difficult to enforce. Applications to convert live-work units into purely residential units and certificates of lawful development (where the units have not been used for employment purposes) demonstrate a lack of need to secure live-work or work-live within the same self-contained unit. Applications for live-work will not be supported outside of the Hackney Wick and Fish Island Creative Enterprise Zone. Instead, the council supports development proposals that offer a range of uses (including employment and housing) as separate units within the same site. There is an existing cluster of Warehouse Living in the Hackney Wick Fish Island Creative Enterprise Zone that provides low-cost work space alongside housing. This cluster plays an important role in the borough's creative economy and will be preserved.

London Plan policies:

- SD5 Offices, other strategic functions and residential development in the CAZ
- SD6 Town centres and high streets
- SD7 Town centres: development principles and Development Plan Documents
- E1 Offices
- E2 Providing suitable business space
- E4 Land for industry, logistics and services to support London's economic function

Local Plan policies:

- LC1 Supporting the network and hierarchy of centres
- MC1 Sustainable travel

Evidence base:

- Tower Hamlets Employment Land Review, 2023

Policy EG3 Affordable workspace

1. Development proposals that include more than 1,000sqm gross commercial floorspace (use Class B2, B8, E(a), E(b), E(c), E(g) and commercial Sui Generis uses) should provide at least 15% of the commercial floorspace at a peppercorn rent and in perpetuity.
2. Development proposals that will result in affordable workspace of 300sqm or more will lease the space directly to the council (or an organisation approved by the council).
3. Development proposals that will result in affordable workspace of less than 300sqm are required to lease the space either to an affordable workspace operator directly or to an end occupier(s). Development proposals must provide an affordable workspace strategy, which sets out their approach to allocating and marketing the subsidised space.
4. Affordable workspace should be designed and fitted out to the current, local industry requirements.
5. The affordable workspace will have an affordable service charge that is no more than 50% of a fair and reasonable proportion of the costs associated with the space.
6. In exceptional circumstances, an affordable workspace financial contribution may be accepted in lieu of on-site affordable workspace provision, where it can be demonstrated that on-site provision is not feasible and/or that a greater economic impact would be achieved through this route.
7. Where a single applicant intends to develop multiple sites within an area, the council may take a strategic approach, considering the requirements for multiple sites collectively.

Supporting text

15.44 LBTH's Employment Land Review (2023) and Affordable Workspace Study (2023) identify a gap in the affordability of commercial space within the borough for many types of businesses. In accordance with the London Plan, affordable commercial space is intended to support: (1) specific sectors that have social value such as charities, voluntary and community organisations or social enterprises; (2) specific sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace; (3) disadvantaged groups starting up in any sector; (4) educational outcomes through connections to schools, colleges or higher education; and (5) start-up and early stage businesses or regeneration.

15.45 Increasing rents and sales costs in Tower Hamlets are making commercial space increasingly unaffordable for the types of businesses and organisations listed above. For this reason, Policy EG3 requires the provision of affordable commercial space in all developments that provide 1,000sqm or more of gross commercial floorspace. Where a development proposal is below this threshold, the council is open to working with developers to secure affordable workspace, particularly in cases where it is necessary to offset harm in relation to another policy.

15.46 In the Strategic Plan 2022-26, the council commits to adopt a community wealth building approach – socially just use of land is a key principle of community wealth building and affordable workspace policy can be used as a mechanism to maximise wider social, economic and community benefits through assets in the borough.

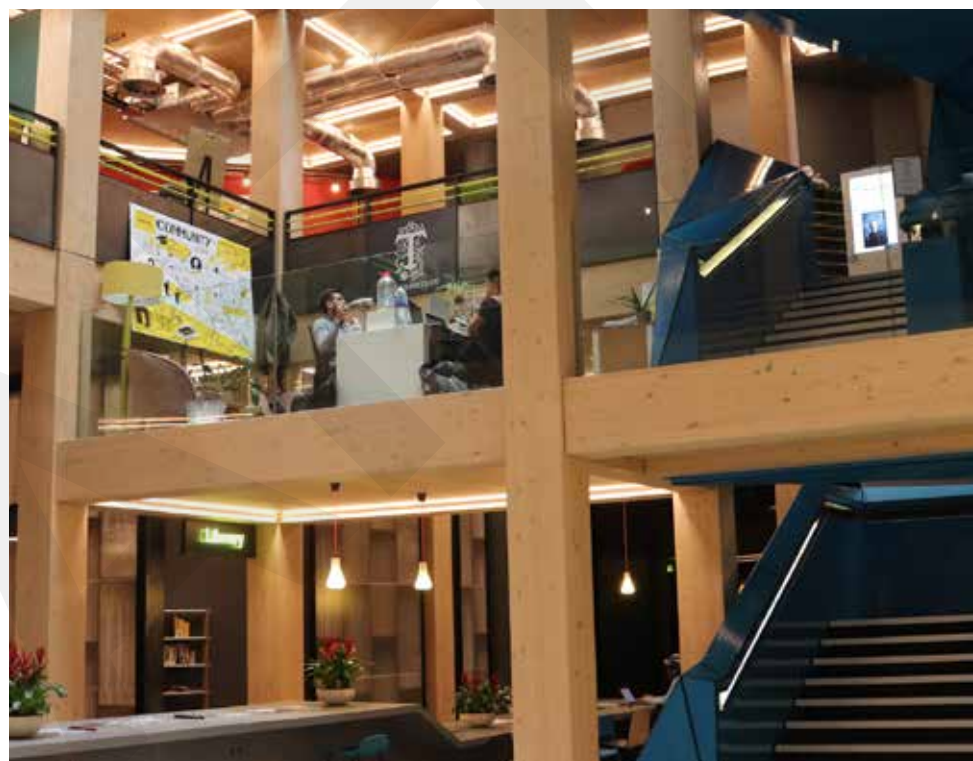
15.47 Given the varied needs and diverse economy of the borough, different types of affordable commercial space will be sought depending on the nature of the development, the need for specific

types of space, and the surrounding context. The types of spaces that may be sought could include:

- Ground floor retail or other public-facing commercial space;
- Arts and cultural facilities;
- Light industrial/maker space;
- Arts production spaces, including artists' studios, performance rehearsal spaces, set design workshops;
- Heavy industry/manufacturing;
- Logistics facilities and last-mile distribution hubs;
- Life science and other laboratory space;
- Traditional office space;
- flexible/shared workspace; and
- serviced office space.

15.48 Developers should engage early in the planning process with LBTH planning officers and the council's economic development team to ensure that the proposed affordable commercial space supports the sectors with the greatest need. In town centre locations, this may include ground floor retail/café/restaurant space or space for arts and cultural facilities; in industrial locations this may include light industrial/maker spaces or space for logistics and last-mile distribution. Depending on the location of the site and the needs of that particular area, it may be appropriate to provide a mixture of different types of affordable commercial workspace.

15.49 In the case of applications for minor material amendments that include a change in the amount of commercial floorspace in a development, this policy should be applied to the overall commercial floorspace of the development as a whole, not just to the uplift.



15.50 In order to ensure stability and continuous provision for the relevant affordable commercial space operators and occupiers, Part 1 of the policy expects the space to be provided for the full lifetime of the development, and this will be secured through a S.106 agreement. Where a development proposes the provision of affordable commercial space for a shorter period, the proposal will need to provide robust viability testing to demonstrate that the period proposed is the longest viable period of time that the space can be provided. In no case will a period of less than 20 years be accepted, to ensure certainty for both the operators and the end users, and to allow the space to support multiple businesses from start-up to move-on.

15.51 In accordance with part 2, development proposals that include 300sqm or more of affordable workspace are required to offer the headlease to the council at peppercorn rent. An operator will be appointed to manage these spaces, provide 'affordable' memberships and deliver wider social value objectives. Having ownership of spaces gives the council more autonomy over what will be delivered, ensuring that affordable workspace supports the council's strategic priorities.

15.52 In accordance with Part 3, for provisions less than 300sqm, the developer is required to lease the space to either an affordable workspace operator(s) or directly to an occupier(s). The developer must provide an affordable workspace strategy, which considers:

- the allocation policy – including the criteria for selecting tenants and a 'graduation' approach as their business grows to become self sufficient;
- the approach to marketing and promoting the space – the council can nominate suitable operators or occupiers for consideration;
- how they intend to prioritise the subsidised space to support aspiring entrepreneurs, start-ups and/or local independent businesses most in need of space;
- how they intend to prioritise the subsidised space to support businesses that can provide specific social, cultural and/or economic development outcomes; and
- wider social value objectives that could be created through the provision of the affordable workspace.

15.53 Given the complexity of the provision of affordable commercial space, applicants are expected to engage with the council as early in the process as possible. The council's economic development team can

support the applicant with identifying a suitable affordable workspace operator or occupier(s).

15.54 The design and fit-out of affordable commercial space are key considerations in its suitability for the end-users. Part 4 of the policy seeks to ensure that all affordable workspace is designed and fitted out to a minimum level that is usable by any end user to ensure that the final occupiers or operators are not responsible for large fit-out costs that then significantly reduce the affordability of the space.

15.55 Development proposals for affordable workspace are expected to meet the following standards:

- development proposals should accommodate with regular plan and flexibility for either open-plan or more compartmentalised modes of occupation;
- all internal walls to be plastered and painted;
- all soffits and structural columns to be exposed fair-faced polished concrete or plastered and painted;
- where thermal/acoustic insulation is applied to soffits, finish suitable for decoration;
- installation of mechanical and electrical services – including ventilation, heating and basic fire detection systems;
- installation of toilets and a kitchenette(s);
- power supply outlets and data cabling points – provision should assume a demand based on maximum possible occupancy;
- raised floors and boxes – floors should have a minimum 5kN loading capacity (4+1kN);
- floor coverings – carpet tiles deemed the most suitable though it may

differ depending on typologies (i.e. light industrial or artist studios);

- floor-to-ceiling height to be as generous as possible, with a minimum floor-to-ceiling height of 3m - 3.8m depending on the layout and use of the space;
- the workspace to comply with all relevant accessibility regulations – including disabled toilets/parking, bicycle storage and arrangements for loading/unloading;
- the entrance must be secure and should not be separated to the main entrance(s) of the development (i.e. a fire exit or back door);
- adequate levels of sunlight/daylight – there is a reluctance to accept a basement or lower ground provision without sufficient access to natural light; and
- other amenities – the affordable workspace should benefit from any other amenities provided within the building (i.e. provision of showers, reception facilities, informal breakout areas, outdoor space and on-site childcare).

15.56 In exceptional circumstances, some variation from the minimum requirements in part 4 may be acceptable where the space is designed for a specific occupier and that occupier has requested a different level of fit out.

15.57 The Hackney Wick and Fish Island Creative Enterprise Zone plays an essential in providing workspace for arts and culture-producing organisations. In order to ensure that the provision of affordable workspace supports this role, space in this part of the borough should be designed to meet the needs of creative businesses.

15.58 Part 5 recognises that high service charges can be an impediment to the take up of affordable workspace by operators and tenants. The overall service charge should reflect only what the affordable workspace tenants have access to and should not include unnecessary additional amenities or overly expensive facilities. The service charge paid by the affordable workspace tenants will be capped at 50% of their reasonable proportion of the overall workspace service charge, including any costs associated with the entrance and internal common parts of the building which the space has rights to. Development proposals should ensure that fit-out of the affordable workspace allows for easy and inexpensive maintenance where possible.

15.59 Part 6 of the policy recognises that there may be exceptional circumstances where a final contribution is more appropriate in lieu of on-site affordable workspace. Examples include (subject to evidence and ultimately at the council's discretion):

- if the developer sufficiently demonstrates they cannot viably provide policy compliant affordable workspace;
- in circumstances where the developer (or council) is unable to let the space after the marketing period (18-24 months) and it can be demonstrated greater economic impact can be achieved through a contribution;
- in exceptional circumstances where the developer (or council) is unable to let the space due to a significant economic shock; and
- affordable workspace contributions will be used to support the development of affordable workspace across the borough.

15.60 Part 7 recognises that, in some circumstances, it may not be viable for development proposals to meet the full affordable workspace requirement. In these cases, development proposals should demonstrate through viability evidence that they are providing the maximum viable amount of affordable workspace. In these cases, the council may apply flexibility on other elements of this policy, including rent, where it would result in a greater proportion of affordable workspace.

15.61 Part 8 recognizes that there may be circumstances in which a strategic approach that considers multiple sites collectively can deliver a better outcome in terms of the quality and function of the affordable workspace, for example, where multiple proposed developments are coming forward concurrently and in close proximity, their affordable workspace obligations can be pooled to deliver a single larger affordable workspace that can achieve greater operating efficiency and better serve occupiers.

London Plan policies:

- E2 Providing suitable business space
- E3 Affordable workspace
- HC5 Supporting London's culture and creative industries

Local Plan policies:

- DV5 Developer contributions
- TC1 Supporting the network and hierarchy of centres
- CI5 Arts and culture facilities

Evidence base:

- Tower Hamlets Employment Land Review 2023
- Tower Hamlets Affordable Workspace Study 2023
- London Office Policy Review 2017
- Affordable Workspace Evidence Base 2018

Policy EG4 Loss and redevelopment of employment space

1. Development proposals resulting in a net loss of industrial floorspace (use classes E(g)(ii), E(g)(iii), B2, B8 and industrial Sui Generis uses) within Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs) will not be supported. Development proposals resulting in a net loss of Warehouse Living (Sui generis) floorspace within the Creative Enterprise Zone will not be supported.
2. Development proposals resulting in a net loss of employment floorspace within the Canary Wharf Preferred Office Location (CW POL) and the Canary Wharf Fringe (CW Fringe) will be supported where the proposal is for an alternative Strategic CAZ function, it can be demonstrated that the loss will not undermine the ability of the borough to meet its objectively assessed need for office floorspace and:
 - a. active marketing has been carried out over a continuous period of at least 12 months at a reasonable market rent which accords with indicative figures, or
 - b. in exceptional circumstances, provide robust demonstration that the site is unsuitable for continued employment use due to its condition, reasonable options for restoring the site to employment use are unviable, and that benefits of alternative use would outweigh the harm of loss of employment floorspace.
3. Development proposals resulting in a net loss of employment floorspace in the City Fringe POL and the rest of the CAZ will be supported where the proposal is for alternative Strategic CAZ functions and it can be demonstrated that all reasonable efforts have been

taken to preserve the space in employment use, including evidence of appropriate maintenance and upkeep and efforts to increase the flexibility of the space for employment uses and:

- a. active marketing has been carried out over a continuous period of at least 12 months at a reasonable market rent which accords with indicative figures; or
 - b. in exceptional circumstances, provide robust demonstration that the site is unsuitable for continued employment use due to its condition, reasonable options for restoring the site to employment use are unviable, and that the benefits of alternative use would outweigh the harm of loss of employment floorspace.
4. Development proposals resulting in a net loss of employment floorspace within the Canary Wharf Fringe, City Fringe POL and rest of the CAZ where the proposal is for a use other than a Strategic CAZ function will be supported where it can be demonstrated that the loss will not undermine the ability of the borough to meet its objectively assessed need for office floorspace, all reasonable efforts have been taken to preserve the space in employment use or alternative Strategic CAZ functions, including evidence of appropriate maintenance and upkeep and efforts to increase the flexibility of the space for Strategic CAZ functions and:
 - a. active marketing has been carried out over a continuous period of 24 months, the first 12 months in accordance with part 3, and the following 12 months for office space and alternative Strategic CAZ functions; or
 - b. in exceptional circumstances, provide robust demonstration

that the site is unsuitable for continued use in an employment use or an alternative Strategic CAZ function due to its condition, reasonable options for restoring the site to employment use or alternative Strategic CAZ functions are unviable, and that the benefits of proposed development would outweigh the benefits of an employment use or other Strategic CAZ functions.

5. 5. Development proposals in LMELs and non-designated locations that would result in a net loss of employment floorspace will be supported where it can be demonstrated that all reasonable efforts have been taken to preserve the space in employment use, including evidence of appropriate maintenance and upkeep and efforts to increase the flexibility of the space for employment uses, and:

- a. the site has been actively marketed for its existing use, alternative employment uses, and alternative community uses such as education uses for a continuous period of at least 12 months at a reasonable market rent which accords with indicative figures; or
- b. In exceptional circumstances, the site is unsuitable for any commercial or community use due to its condition; reasonable options for restoring the site to commercial or community use are unviable; and that the benefits of a residential use would outweigh the benefits of employment, commercial or community use.

6. Development proposals that involve the redevelopment of existing occupied workspace, even where there is no net loss of employment floorspace, will not be supported unless:

- a. the workspace is provided with equivalent layout, fit-out and rent levels based on that which has been lost and existing tenants are given the right of first refusal for the re-provided space; and proposals provide a decanting plan to ensure that the businesses can continue to operate during the construction phase, including finding suitable temporary accommodation, at equivalent rents, within the borough unless it can be shown that the needs of the business are better met elsewhere; or
- b. the development proposal identifies alternative space with a size, layout, rent and connectivity equivalent to the existing that is available and considered suitable by the occupier. The alternative space should be located within the borough unless it can be shown that the needs of the business are better met elsewhere.

Supporting text

15.62 This policy describes the criteria that will be used to assess the potential loss of employment space within the borough in line with the vision and objectives of the plan (see Section 2).

15.63 In accordance with Part 1, any development proposals that would result in a net loss of employment floorspace within a SIL or a LIL will not be supported. This reflects the significant level of demand for industrial floorspace in the borough and the important role it plays in providing employment and entrepreneurial opportunities to local residents.

15.64 In addition, Part 1 recognises the important role that the Warehouse Living community in Hackney Wick and Fish Island plays in providing low-cost living and working spaces to those in creative and other industries. Given the decline of this community in recent years and its importance to the creative economy, this space will be protected and proposals that include a net loss will not be supported.

15.65 Part 2 recognises that changes in demand for office floorspace in the borough may allow for a net loss of office floorspace within the Canary Wharf POL where this can be justified in relation to the borough's objectively assessed need for office space. The objectively assessed need for office floorspace comprises two elements, the existing stock of office floorspace (both occupied and vacant) and need for new office floorspace projected by the Employment Land Review (2023) for the plan period. Within the Canary Wharf POL and Fringe, the existing stock is estimated at 1.5m sqm. The projected need within the Canary Wharf POL and Fringe is calculated by taking 86% of the borough-wide projection to reflect that 86% of the office pipeline is located in Canary Wharf, then adding a buffer of 33% to reflect the lack of certainty in the

final 5 years of the 15 year plan period. This amounts to a projected need for 243,380sqm of office floorspace during the plan period, and means that development should not result in existing and pipeline office space falling below 1.75m sqm within the Canary Wharf POL and Fringe.

15.66 Part 3 recognises that there may be opportunities within the Canary Wharf Fringe, City Fringe POLs and other parts of the CAZ to deliver alternative Strategic CAZ functions where a loss of employment floorspace can be justified. For the purposes of parts 3 and 4 of the policy, alternative CAZ strategic functions include:

- functions associated with the State, Government and Monarchy;
- diplomatic organisations (such as embassies and high commissions);
- uses connected with science, technology, media, communications and cultural sectors of regional, national and international importance;
- centres of excellence for higher and further education and research;
- centres of medical excellence and associated specialist facilities;
- legal establishments of regional, national and international importance;
- arts, culture, leisure and entertainment activities and areas of regional, national and international importance;
- retailing, including specialist outlets, of regional, national and international importance; and
- specialist creative clusters including for example clothing, fashion, jewellery, printing, antiques, musical instruments, art, and culture.

15.67 Tourism facilities including hotels and conference centres are considered an alternative Strategic CAZ Function only in the Canary Wharf POL and the Canary Wharf Fringe. This is on the basis that

allowing for the loss of office floorspace in the City Fringe to allow for hotel development risks resulting in an oversupply of hotels and an uncoordinated and piecemeal loss of office space.

15.68 Parts 3-5 require marketing evidence covering a continuous period of at least 12 months (or 24 months in the case of Part 4) in order to prevent unnecessary loss of existing employment space which would put pressure on the ability of the borough to meet projected need, and to ensure that temporary or seasonal changes to the economy do not result in a longer term loss of office floorspace. In order to demonstrate that the site has been marketed for a continuous period of 12 months, applicants must submit a marketing report showing all methods used to market the space (including active hyperlinks to websites where the space has been marketed). The report should demonstrate that the asking rent has been at a realistic rate for the type, size, and condition of the space. Such information should accord with our indicative guidance which is regularly updated. It would be expected that the property or site has been actively marketed, including appearing on local and national commercial property websites and visible display boards being displayed at the site. Applicants are also expected to engage with the council's employment and economic development team to ensure that the property or site is marketed via the relevant council channels. The report should detail the level of interest in the property over the 12-month (or 24-month) period, details of any viewings and offers, and details of why any interest had not been taken forward. Where the application pertains only to part of a building or office complex, the marketing report should show what floorspace the application pertains to.

15.69 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 report on the history and condition of the property to justify why marketing evidence should not be required and how and why re-providing employment space as part of redevelopment would not be viable. It should be demonstrated that the proposed development would not prejudice wider land-use objectives or the delivery of site allocations, and that reverse-sensitivity issues would not arise through conflict with surrounding existing uses, particularly where it lies within a cluster of other employment uses. The report should also demonstrate that the benefits of an alternative use would outweigh the benefits of the employment use to meet other local plan objectives, such as the need for complementary town centre uses or to maintain active frontages within town centres.

15.70 Part 5 recognises that LMELs play a particularly important role in supplying workspace for local independent businesses, start-ups, and emerging industries, often at a lower cost than in POLs. Given the challenges of forecasting demand for space to support smaller businesses and emerging industries, it is essential to ensure that there is a pipeline of workspace that supports these businesses. Education uses can operate synergistically alongside local independent businesses, start-ups and emerging industries, providing academic expertise and a supply of graduates, as well as incubator spaces and other shared facilities. Therefore, education uses will be prioritised where it can be demonstrated that there is no demand for employment uses within LMELs. Where the site is also within a town centre, other main town centre uses will also be prioritised where they accord with the town centre policies. Applications for residential use in these locations will need to demonstrate that there is no demand for any employment or education uses (or, where located in a town centre, main town centre uses).

15.71 Part 6 seeks to ensure that the disruptions to businesses from the redevelopment of employment space are minimised, even where the proposal does not result in any net loss of employment floorspace. Given the relatively low cost of much of the borough's existing workspace, and the higher cost of new-build floorspace, the redevelopment of existing, occupied employment space can risk displacing established businesses, or even rendering them unviable where they serve a local customer base and cannot move to lower-cost areas. In order to minimise the disruption to established businesses, redevelopment of employment space will be required to re-provide the existing floorspace to an equivalent fit-out, with an equivalent layout and at equivalent rents. Proposals for redevelopment are also required to provide a decant plan, showing that suitable equivalent workspace that meets the needs of the existing businesses at rents equivalent to their existing rents are available in the borough, or elsewhere where this can better meet the needs of the business, to accommodate the businesses during the construction phase of the development.

London Plan policies:

- SD4 The Central Activities Zone (CAZ)
- SD5 Office, other strategic functions and residential development in the CAZ
- E1 Offices
- E2 Providing suitable business space
- E4 Land for industry, logistics and services to support London's economic function
- E5 Strategic Industrial Locations (SIL)
- E6 Locally Significant Industrial Sites
- E7 Industrial intensification, co-location and substitution
- E8 Sector growth opportunities and clusters

Local Plan policies:

- C11 Supporting community facilities
- C13 New and enhanced community facilities
- C15 Arts and culture facilities

Evidence base:

- Tower Hamlets Employment Land Review, 2023
- Central Activities Zone SPG, 2016
- London Office Policy Review, 2017
- Central Activities Zone Economic Future Research, 2021

Policy EG5 Railway arches

1. Development proposals involving railway arches will be supported where:
 - a. The principal use is for an appropriate commercial, industrial, community, cultural or similar Sui Generis use; or
 - b. An operational use associated with the railway or public highway; and
 - c. The use will not cause harm to the environment and amenity of neighbouring uses and properties.
2. Development proposals resulting in a net loss of industrial uses (use Classes E(g)(iii) and B) in railway arches will not be supported unless it can be demonstrated that:
 - a. active marketing has been carried out over a continuous period of at least 12 months at a reasonable market rent which accords with indicative figures; or
 - b. in exceptional circumstances, provide robust demonstration that the site is unsuitable for continued employment use due to its condition; reasonable options for restoring the site to employment use are unviable; and that the benefits of alternative use would outweigh the benefits of employment use; and
 - c. all reasonable efforts have been taken to preserve the space in employment use, including evidence of appropriate maintenance and upkeep and efforts to increase the flexibility of the space for employment uses.
3. Development proposals connecting through arches must investigate opportunities to improve accessibility by walking and cycling, where feasible and appropriate.
4. Development proposals for development on sites that include, or are adjacent to railway arches must ensure that access into the arches is retained and that the proposal does not have a detrimental impact on the ability of occupiers to use the arches for appropriate uses.
5. Development proposals involving railway arches must demonstrate that they will not have an adverse impact on the public highway and railway network or preclude the delivery of planned transport infrastructure.

Supporting text

15.72 The Tower Hamlets Employment Land Review (2023) and the Affordable Workspace Study (2023) acknowledge the important role played by railway arches in providing low-cost workspace to a range of occupiers. Given the shortfall of available industrial land in the borough to meet the demand, it is essential to preserve spaces that can support industrial uses even where they fall outside of SIL and LSIS designations.

15.73 Part 1 of the policy seeks to retain railway arches in uses that make a positive contribution to the economy, culture, and community of Tower Hamlets. Railway arches in the borough contain a wide variety of uses, including light and heavy industry, food and drink production, arts, and culture and public-facing town centre uses. Given the variety of these uses, other policies may also be relevant; for example, proposals for 'dark kitchens', where there are regular food delivery pick-ups must have regard to Policy TC5; proposals for an arts and culture facility, or where there is an existing arts and culture facility, must have regard to Policy C5; proposals for public-facing town centre uses must have regard to the town centre policies.

15.74 Part 2 requires evidence covering a continuous period of at least 12 months in order to prevent unnecessary loss of existing industrial space which would put pressure on the ability of the borough to meet projected need. In order to demonstrate that the site has been marketed for a continuous period of 12 months, applicants must submit a marketing report showing all methods used to market the space (including active hyperlinks to websites where the space has been marketed). The report should demonstrate that the asking rent has been at a realistic rate for the type, size, and condition of the space. Such information should accord with our indicative guidance which is regularly updated. It would be expected that the property or site has been



actively marketed, including appearing on local and national commercial property websites and visible display boards being displayed at the site. Applicants are also expected to engage with the council's employment and economic development team to ensure that the property or site is marketed via the relevant council channels. The report should detail the level of interest in the property over the 12-month period, details of any viewings and offers, and details of why any interest had not been taken forward.

15.75 There may be cases where a net loss of industrial floorspace in railway arches, by virtue of their location, can support other policy objectives. For example, where a railway arch fronts onto a primary

or secondary shopping frontage in a town centre location, a public-facing main town centre use may better support the vitality and viability of the town centre. These will be assessed on a case-by-case basis, and a strategic approach may be supported where an applicant can demonstrate that they are bringing a comparable amount of railway arch floorspace into industrial use elsewhere.

15.76 Part 3 seeks to ensure that railway arches make a positive contribution to the connectivity and public realm of the local area.

15.77 Part 4 recognises that, given the nature of the uses within railway arches, they often have specialised or complicated access arrangements, including the need for 24/7 access and access for larger vehicles and equipment. It is essential that new development does not undermine that access or more broadly the ability of the occupiers to operate.

15.78 Part 5 seeks to ensure that development involving railway arches does not prejudice the delivery of any planned transport infrastructure. This reflects the fact that railway arches form part of the existing transport infrastructure and are often the primary locations for the development of new or enhanced transport infrastructure. The development of this infrastructure may require special access arrangements within and around the railway arches. Therefore, early engagement with Network Rail, TfL and/or the Highways Authority will be essential to any proposals involving railway arches.

London Plan policies:

- E2 Providing suitable business space
- E4 Land for industry, logistics and services to support London's economic function
- E7 Industrial intensification, co-location and substitution

Local Plan policies:

- PS4 Attractive streets, space, and public realm
- MC3 Impacts on the transport network
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Tower Hamlets Employment Land Review, 2023
- Tower Hamlets Affordable Workspace Study, 2023

Policy EG6: Data centres

1. Development proposals for data centres in Local Industrial Locations and Local Mixed-use Employment Locations will be supported where they:
 - a. do not undermine the supply of land or floorspace for employment uses, including office and industrial uses;
 - b. demonstrate that there is a need or demand for the facility in the proposed location;
 - c. can demonstrate that there is sufficient electrical capacity in the local area to power the facility without placing a limit on other types of development in the area;
 - d. provide affordable workspace in accordance with Policy EG3;
 - e. can demonstrate that any negative amenity impacts on neighbouring residential uses;
 - f. provide a design that enhances adjacent public realm and supports or enhances the character of the area; and
 - g. demonstrate that efforts have been made to ensure that the waste heat generated by the facility will be reused or supplied to a local heat network.
2. Development proposals for data centres outside of locations listed in Part 1 will not be supported.

Supporting text

15.79 Data centres play an important role in ensuring that there is sufficient broadband capacity to serve the residents, businesses and educational institutions in the borough. They also provide data storage capacity for businesses, making Tower Hamlets an attractive location for businesses with substantial data needs.

15.80 Data centres are generally considered to fall into use Class B8 given that they act as storage facilities for data. In some cases, they may be considered Sui Generis uses where their role is related more to data processing.

15.81 While data centres are important to the functioning of the borough's businesses, they have low employment densities relative to other employment uses and can take up substantial amounts of land and floorspace. In order to ensure that the borough can continue to meet its employment targets and provide sufficient space for new and growing businesses, part 1(a) requires development proposals for data centres to demonstrate that they will not undermine the supply of land or floorspace for employment uses. To satisfy this criterion, development proposals should carry out an assessment of the demand for both office and industrial workspace and clearly demonstrate that the demand can be satisfied without the floorspace that is, or could be, provided on the development site. This assessment should include vacancy rates for nearby industrial and office facilities and have regard to the Employment Land Review (2023). For the purposes of this policy, employment uses include use Class E(g)i-iii, B2, B8 and appropriate Sui Generis uses.

15.82 Part 1(b) recognises that there is a particular demand for data centres to serve businesses in the City of London and Canary Wharf and that they should be located with regard to high capacity fibre optic lines. Data centres that do not serve this specific function or cannot identify a specific locational requirement will not be supported.

15.83 As data centres have high electricity demands and can monopolise capacity in the local supply, placing a limit on the amount of residential development that can be accommodated in an area, Part 1(c) sets requirements on how to manage this resource better / effectively. Capacity should be proven at primary substation, distribution, grid supply point and transmission level, as applicable. It requires development proposals for data centres to engage with electricity suppliers and receive confirmation from those suppliers that the electricity requirements of the proposed data centre can be accommodated without limiting electricity supply such that it would prevent delays to other types of development being delivered in the area.

15.84 Given that data centres are classified as an employment use, part 1(d) requires data centres to provide affordable workspace in accordance with the requirements of Policy EG3. The amount of affordable workspace to be provided will be calculated using the full GIA of the data centre, including space only used for servers. Particular constraints unique to data centres, including their plant needs, floorplates and security concerns, may make on-site provision unfeasible. In these cases, off-site provision or a payment-in-lieu may be accepted.

15.85 Existing data centres in Tower Hamlets often present blank frontages onto pavements and other pedestrian routes. This creates unpleasant spaces and can result in spaces that feel unsafe. Part 1(f) requires the design of data centres to enhance adjacent public realm. This could be through greening or public art. Data centres should also be designed sensitively to ensure that ground floor servicing and plant spaces do not undermine adjacent pedestrian or cycle routes.

15.86 Data centres generate large amounts of heat, which is often rejected to the air outside of the building. In order to help the borough achieve its net zero carbon target, and to reduce the cost of heating

for local residents and businesses, Part 1(g) requires data centres to reuse that heat or to provide it to a local heat network. Cumulative noise impact assessment must prove that sensitive receptors are not negatively affected.

15.87 SILs and POLs play an essential role in ensuring that there is sufficient floorspace to meet the needs of office and industrial businesses in the borough. Given the large amounts of land that data centres occupy, their low employment density and their general inability to co-locate with other employment uses, part 2 of the policy restricts data centres from these designated locations. There may be some circumstances, such as upwards extensions, where an expansion to an existing data centre would not result in a loss of land that could be used for other purposes; these may be considered acceptable where they meet all other policy requirements.

London Plan policies:

- E2 Providing suitable business space
- E3 Affordable workspace
- E4 Land for industry, logistics and services to support London' economic function
- •SI6 Digital connectivity infrastructure

Local Plan policies:

- DV7 Utilities and digital connectivity
- CG2 Low energy buildings
- CG10 Noise and vibration

Evidence base:

- Tower Hamlets Employment Land Review, 2023

16. Town centres



TC1 – Supporting the network and hierarchy of centres

TC2 – Protecting the diversity, vitality and viability of town centres

TC3 – Town centre uses outside centres

TC4 – Markets

TC5 – Food and drink

TC6 – Entertainment uses

TC7 – Evening and night-time economy

TC8 – Short-stay accommodation

Introduction

16.1 This chapter focuses on ensuring that our town centres remain vibrant and sustainable while continuing to meet the needs of the people that use them. They also underpin our strategic mission as set out in the Tower Hamlets Strategic Plan to 'support small businesses, start-ups and markets.'

16.2 Town centres form an important part of the borough's distinct identity and character, acting as anchors for local neighbourhoods with a mix of uses and activities that draws our diverse communities together and provide spaces for local entrepreneurs and independent businesses and employment opportunities for local residents. The nature of our town centres continues to change and evolve – they are increasingly becoming hubs for leisure, social and community activities, not just for shopping. They also provide significant opportunities for employment and housing, particularly on upper floors. Additionally, across the borough, there are other areas of commercial, leisure, and retail activity (including individual stand-alone units) which have a role in supporting the borough's needs.

16.3 Town centres continue to be at the heart of the borough's communities, providing spaces for social interaction and leisure and ensuring that residents can meet their day-to-day needs in an accessible and sustainable location.

16.4 In 2020, changes to the Use Class Order resulted in the creation of a new use class, Class E, which incorporates most of the main town centre uses (formerly A Class uses). Retail (Class E(a)), restaurants and cafes (Class E(b)), and professional and financial services (Class E(c)) now fall within Class E, alongside gyms (Class E(d)), health centres and GP surgeries (Class E(e)), nurseries and creches (Class E(f)), and offices,

research and development facilities and light industrial businesses (Class E(g)).

16.5 In 2021, a new permitted development right was introduced across England to allow Class E uses to change to residential use without the need for a full planning permission. Tower Hamlets has introduced an Article 4 Direction, which restricts that permitted development right within most parts of our town centres and designated employment locations.

16.6 The purpose of the Article 4 Direction is to ensure that changes to the use of spaces within our town centres is managed through the

16.7 planning process in accordance with the policies in this chapter and the local plan more broadly. It also ensures that the development of housing in town centres complies with the policies of this plan, including the requirement to provide affordable housing.

16.8 This section contains the following policies.

- Policy TC1: Supporting the network and hierarchy of centres
- Policy TC2: Protecting the diversity, vitality and viability of our town centres
- Policy TC3: Town centre uses outside our town centres
- Policy TC4: Markets
- Policy TC5: Food and drink
- Policy TC6: Entertainment uses
- Policy TC7: Evening and night-time economy
- Policy TC8: Short-stay accommodation



Policy TC1 Supporting the network and hierarchy of centres

1. The council will support the vitality and viability of the borough's town centres by:

- a. promoting a mix of uses focused on retail, food and drink, professional and financial services, leisure, arts and culture, community facilities, recreation and housing;
- b. promoting Primary and Secondary Frontages as the locations within our District Centres where retail uses are located and should be concentrated;
promoting inclusive design, including ensuring that all users feel safe in our town centres throughout the day and night;
promoting night-time economy uses that contribute to the inclusiveness, activity and economic vitality of town centres, including vibrant food and drink, entertainment, leisure and arts and culture uses, alongside late-opening shops and services that meet the needs of those who work at night;
- e. promoting mixed-use and multi-purpose town centres (which include new residential uses where appropriate) with a mix of unit sizes and types, including affordable retail space, to assist in the creation of vibrant centres that offer a diversity of choice, and the meet the needs of local communities;
- f. promoting multifunctional, diverse and inclusive leisure and cultural venues and promoting associated uses;

- g. promoting and focusing markets in town centres and recognising their role in adding variety, promoting local enterprise and contributing to local character;
 - h. supporting meanwhile and community uses where they help to activate and revitalise vacant town centre units and sites; and
 - i. prioritising street level activity along the borough's primary and secondary frontages and key pedestrian routes to encourage opportunities for social interaction.
2. 2. The council will expect development proposals to support the town centre hierarchy and to maintain and enhance the role and function of the town centres:

Table 11: Town Centre Hierarchy

Tier	Location	Functions / roles	Night-time economy designations
Central Activities Zone (CAZ)	Refer to the Policies Map	Apply the London Plan's approach to development within the CAZ.	
Metropolitan Centre	Canary Wharf	<ol style="list-style-type: none"> 1. Provide a large number of leisure, cultural and civic facilities to support a growing residential community. 2. Provide a high proportion of comparison retail compared to convenience to reflect the importance of Canary Wharf as a shopping destination. 3. Continue to support its role as a key global commercial and employment centre. 4. Expand the mix of uses including the introduction of housing where possible. Improve local accessibility to Canary Wharf and its strategic transport interchange, and legibility and way-finding across the area. 	Canary Wharf is a night-time economy centre of regional significance.
Tower Hamlets Activity Areas	Refer to the Policies Map	<p>Provide areas of transition between the scale, activity and character of the CAZ and Canary Wharf Metropolitan Centre and their surrounding areas.</p> <p>Support a mix of town centre, employment and community uses.</p> <p>Promote active uses at ground floor level.</p>	

Tier	Location	Functions / roles	Night-time economy designations
District Centres Page 838	Bethnal Green Brick Lane Crisp Street Crossharbour Roman Road East Roman Road West Three Mills Lane Watney Market Whitechapel City	1. Act as the borough's primary hubs for employment, shopping, leisure, culture, community and civic uses. 2. Provide a higher proportion of comparison retail compared to convenience retail. For Whitechapel City, act as civic hub for the borough through the new Town Hall, and provide a concentration of health-related community services and employment in life sciences.	Brick Lane – centre of regional significance Bethnal Green – centre of local significance Whitechapel City – centre of local significance
Specialist Centres	Columbia Road Redchurch Street Hackney Wick	Columbia Road – support the specialist shopping and leisure role of Columbia Road by retaining the very small-scale commercial units and promoting their continued occupation by independent, artisanal businesses. Redchurch Street – support the specialist shopping role of Redchurch Street as a centre for independent clothing retailers and a centre for food and drink and the nighttime economy. Hackney Wick – working with the London Borough of Hackney, support the strong mix of employment and town centre uses, with a particular emphasis on culture and the arts, as well as evening and night-time leisure uses including micro-breweries.	Columbia Road – centre of local significance Redchurch Street – centre of local significance Hackney Wick – centre of local significance

Tier	Location	Functions / roles	Night-time economy designations
CAZ Centres	Wentworth Street Spitalfields Aldgate South	<ol style="list-style-type: none"> 1. Wentworth Street (CAZ Retail Cluster) – support the area's role as home to the historic Petticoat Lane Market and retain the existing concentration of textile and clothing businesses. 2. Spitalfields – support the diverse mix of town centre and employment uses within and around Spitalfields Market, protect its role as an attraction to visitors from across London and beyond and as a vibrant centre of night-time activity. 3. Aldgate South – provide a diverse mix of town centre uses to serve the local residential community and attract visitors from further afield. 	Spitalfields – centre of local significance
Neighbourhood Centres	Aberfeldy Street Barkantine Estate Ben Johnson Road Burdett Road South Cambridge Heath Devons Road Limehouse London City Island Mile End Poplar High Street Salmon Lane South Quay Stroudley Walk Stepney Green Thomas More Wapping Lane	<p>Provide a range of shops and services to meet the needs of their local catchments, with a higher proportion of convenience retail compared to comparison retail.</p> <p>Ensure development is appropriate to the nature and scale of each individual centre.</p>	Cambridge Heath – centre of local significance

Supporting text

16.9 This policy defines the network of centres across the borough (as illustrated on Figure 17) and describes the role and function of each centre and how they will continue to serve the needs of the borough and the wider area. The boundaries of these centres are shown on the Policies Map.

16.10 Town centres act as hubs for the borough's communities and, as such, should incorporate a mixture of complementary uses. This should include housing development where appropriate. The development of housing in town centres can have a positive impact on other uses within the town centre by introducing a larger customer base for local businesses and increasing the overall vibrancy and vitality of the town centre. Town centre housing also ensures that residents are in well-connected locations and can meet their day-to-day needs within easy walking distance from their homes.

16.11 Development within these centres will need to demonstrate how it accords with policies and guidance within the hierarchy as appropriate.

16.12 The western part of the borough (as shown on Figures 6 and 18) lies within the CAZ. The CAZ is the geographical, economic, and administrative heart of London, one of the world's most important financial and business centres, and contains the Metropolitan employment, leisure and retail designations within London.

16.13 All development proposals within this zone should refer to the relevant policies set out in the London Plan and the CAZ Supplementary Planning Guidance.

16.14 Within the CAZ, three areas are designated as 'CAZ Centres'. These are areas within the CAZ that play the role of a neighbourhood centre, with clusters of main town centre uses that serve the needs of the surrounding residential, worker and student community as well as visitors to Central London. Wentworth Street is designated as a CAZ Retail Cluster in the London Plan and includes a particularly significant cluster of clothing and fabric shops and hosts Petticoat Lane Market, which has been in operation for at least 400 years. Spitalfields is locally designated and includes the well-known covered market as well the adjacent streets to the south, which contain a mixture of food and drink businesses that contribute to the evening and night-time economy. Aldgate South (within the Goodman's Fields development) is locally designated and primarily serves the surrounding high-density residential community, but also includes businesses that attract customers from further afield, including a cinema.

16.15 Development within the Metropolitan Centre of Canary Wharf would be expected to demonstrate that it contributes to the continuing growth of Canary Wharf and supports its role as an important centre for international business and finance within the CW POL, as well as its emerging residential neighbourhood at Wood Wharf.

16.16 The Tower Hamlets Activity Areas (as shown on the Policies Map) are specific areas bordering the CAZ and the CW POL where the scale, continuity and intensity of town centre activity and land use is different to that found across the rest of the borough. Within the Tower Hamlets Activity Areas, applicants will be expected to demonstrate how the proposals will enhance movement and connectivity to and through the designation, in particular improving links between Canary Wharf and surrounding areas to the north and south.

16.17 District Centres (as shown on the Policies Map) generally meet more local needs, with catchments of around 800 metres and provision of convenience goods and services. Typically, they contain around 10,000-50,000 square metres of retail, leisure, and service floorspace. They have high levels of accessibility. They are also generally suitable locations for housing and employment.

16.18 Neighbourhood Centres (as shown on the Policies Map) contain clusters of retail and services to meet the needs of a more local catchment and typically contain at least sixteen units. Units are predominantly small-in-scale, with convenience supermarkets of around 500 square metres tending to be the largest occupants. Larger neighbourhood centres may also be appropriate for some leisure and night-time economy uses.

16.19 While of a similar scale to neighbourhood centres, Redchurch Street, Columbia Road, and Hackney Wick serve specialist roles and are therefore given a different designation. Redchurch Street contains a significant cluster of fashion shops that attracts customers from across London as well as a strong food and beverage offer that supports the night-time economy; this cluster will be protected and enhanced by ensuring that new development within Redchurch Street Centre includes small retail and other commercial units that meet the needs of fashion retailers, restaurants, and bars. Columbia Road is known across London for its Sunday flower market and for its mix of small artisanal businesses and village-like character. This character will be supported by ensuring that the commercial units remain very small in size and by resisting any consolidation of ground floor commercial units. Hackney Wick contains a unique mix of industrial and leisure uses, including a regionally significant cluster of arts production and consumption spaces, as well as a strong night-time economy. This area's unique character will be protected and enhanced by retaining existing arts, employment



and leisure uses and ensuring that new development is mixed-use and supports the Creative Enterprise Zone designation.

16.20 The night-time economy refers to all economic activity taking place between the hours of 6pm and 6am, and includes evening uses. Night-time economic activities include eating, drinking, entertainment, shopping, and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport, and medical services, which employ a large number of night-time workers. The night-time economy plays an important role in the borough's economy and Tower Hamlets has a number of town centres that play a particularly significant role

16.21 in the night-time economy. The London Plan designates centres of significance to the night-time economy. In Tower Hamlets these are Canary Wharf, which is designated as a night-time centre of regional significance, and Brick Lane, which is designated as a night-time centre of sub-regional significance. In addition to these centres, the Local Plan designates a number of additional centres that play an important local role in the night-time economy. These includes centres that have large concentrations of food, drink, and entertainment businesses, as well as Whitechapel City, with the arrival of the Elizabeth line and the hospital which brings large numbers of workers and patients through the night.

16.22 Development of night-time uses, particularly food, drink, and entertainment uses, should be related in scale and nature to the centre in which they are proposed. This is to ensure that larger night-time businesses can benefit from existing infrastructure and so that businesses can contribute to the vitality and viability of the centres at night, while limiting their impact on the amenity of other users. The development of night-time uses is addressed in more detail in Policy T7.

16.23 In accordance with Policy EG3, development proposals that include at least 1000sqm of commercial floorspace are expected to provide affordable commercial floorspace. More details can be found in Policy EG3. Where sites are located within town centres, the council may seek the provision of affordable retail or other public-facing commercial space.

London Plan policies:

- SD4 The Central Activities Zone (CAZ)
- SD6 Town centres and high streets
- SD7 Town centres: development principles and Development Plan Documents
- SD8 Town centre network
- Eg Retail, markets and hot food takeaways
- E10 Visitor infrastructure

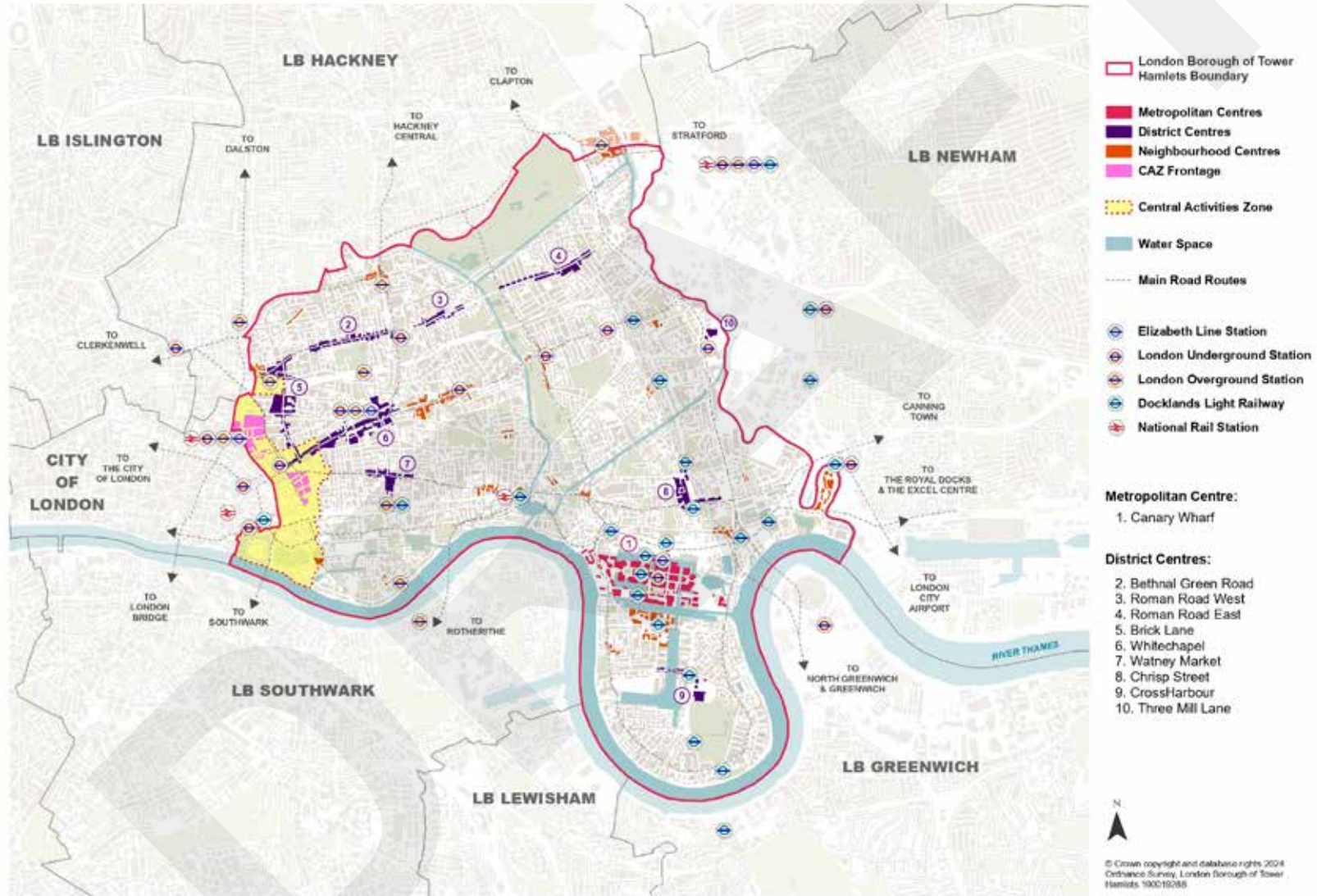
Local Plan policies:

- DV1 Areas of growth and opportunity within Tower Hamlets
- DV2 Delivering sustainable growth in Tower Hamlets
- PS5 Gender Inclusive Design
- PS9 Shopfronts
- CI1 Supporting community facilities
- CI4 Public houses
- CI5 Arts and culture facilities
- MC1 Sustainable travel
- MC2 Active travel and healthy streets
- MC5 Sustainable delivery, servicing and construction

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- London Town Centres Health Check, 2018
- Culture and the Night Time Economy SPG, 2017
- Night Vision: Rebuilding London's Night-Time Economy, 2021

Figure 17: Town centre hierarchy



Policy TC2 Protecting the diversity, vitality and viability of our town centres

1. Development proposals are expected to support the retail function of Primary and Secondary Shopping Frontages and the Redchurch Street and Columbia Road Specialist Centres, prioritising Class E(a) retail uses in these locations. Non-Class E(a) retail uses in Primary Shopping Frontages will only be supported where they can demonstrate that the proposal will not undermine the vibrancy vitality and viability of the town centre, or the level of access to goods and services for local residents.
2. Planning conditions may be used to secure Class E(a) uses that contribute to the retail function of Primary and Secondary Shopping Frontages and the Columbia Road and Redchurch Street Specialist Centres.
3. Where retail development is conditioned for Class E(a) use, development proposals seeking a change to another main town centre use, including full flexibility for Class E commercial, business and service uses, will not be supported unless it can be demonstrated that active marketing has been carried out over a continuous period of at least 6 months at a reasonable market rent which accords with indicative figures.
4. Development proposals for uses other than Class E(a) retail uses (including residential development) within town centres and neighbourhood parades should demonstrate that the development, whether individually or cumulatively with others, will support the retail functions of the town centre by:
 - a. Contributing to the vitality, viability and character of the Primary and Secondary Shopping Frontage;

- b. ensuring access to a range of goods and services;
 - c. being of a type and scale appropriate to the size and function of the centre;
 - d. contributing positively to the quality of public realm, being inclusive, open in character and engaging to the public;
 - e. providing for well-managed and maintained street edges to the town centre;
 - f. where appropriate, responding to neighbourhood and place-specific visions and challenges;
 - g. providing an appropriate main town centre use at the ground level that will attract visitors, and generate footfall; and
 - h. ensuring that they will not result in a negative impact on the amenity of neighbouring occupiers.
5. Development proposals within the Columbia Road and Redchurch Street Specialist Centres should support the existing character by:
 - a. in Columbia Road, retaining small-scale shopfronts no wider than 4m; and
 - b. in Redchurch Street, retaining or re-providing small shopfronts that are suitable for independent fashion retailers.
 6. Development proposals for residential uses on the ground floor level or below, within town centres and Neighbourhood Parades will not be supported.
 7. Development proposals resulting in a reduction of Class E(a) retail floorspace in town centres and Neighbourhood Parades will not be supported unless they can demonstrate that:

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- a. where there is a sub-division of a large unit, the new units are of a size and scale conducive to supporting the role and function of their surroundings;
 - b. the existing level of floorspace cannot be maintained and that appropriate height, width and depth of floorspace would remain for town centre uses; and
 - c. within Primary Frontages and the boundaries of Columbia Road and Redchurch Street Specialist Centres, any loss of floorspace is of a scale that will not materially alter the nature of the unit, its future viability, and the function of the host shopping area.
8. Meanwhile uses in town centres will be supported in vacant shopfronts and on vacant sites in town centres where:
- a. the proposed uses contribute to the diversity, vitality and viability of town centres having regard to the scale of the proposal in relation to the position of the town centre in the Town Centre Hierarchy;
 - b. the proposal will not result in any negative impacts on the amenity or operations of neighbouring occupiers; and
 - c. a 'move on' plan is provided that makes arrangements for relocation when the site comes forward for development or demonstrates that the use can operate on a temporary basis.
9. Development proposals for payday loan shops will only be permitted in the CAZ, Metropolitan Centre, Tower Hamlets Activity Areas and secondary frontages of the District Centres where they would be at least 400m walking distance from the nearest existing payday loan shop.

Supporting text

16.24 For the purposes of this policy, town centre uses include those listed in the NPPF as 'Main Town Centre Uses': retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels, and conference facilities).

16.25 Part 1 identifies a series of Primary and Secondary Frontages within the District Centres (as shown on the Policies Map). Primary Frontages include a high proportion of (Class E(a)) retail uses, while Secondary Frontages provide opportunities for a greater diversity of main town centre uses to support the vitality and viability of the town centres.

16.26 Part 1 expects development proposals to maintain the predominantly retail character of Primary Shopping Frontages and the mixed character of Secondary Shopping Frontages. Retail uses are directed to Primary Shopping Frontages first and Secondary Shopping Frontages second. In order to demonstrate that development proposals will not undermine the vibrancy, vitality and viability of the town centre, applications should provide an assessment of the current level of retail provision in the Primary Shopping Frontage and across the town centre, demonstrating that a range of goods and services will continue to be provided.

16.27 Within the Secondary Frontages, a wider mix of uses (e.g. financial and professional services, community and leisure facilities) which contribute to the vitality and viability of the town centre will be supported.



16.28 Undesignated frontages are areas within the District Centres that contribute to the overall offer of the centre but perform a more tertiary function (e.g. small offices, wholesalers and market storage) or community functions with little or no retail use.

16.29 Frontages have not been designated within the Canary Wharf Metropolitan Centre. This is because it is a predominantly undercover shopping complex in single, private ownership that functions differently to other town centres in the borough.

16.30 For the purposes of this policy, impacts on the amenity of neighbouring occupiers include odours, fumes and other air pollution,

excess noise and vibrations, reduction in daylight and/or sunlight to habitable rooms, reduction in level of privacy for residents. It is also essential to ensure that development within a town centre does not undermine the operations of other businesses operating in the centre, this includes retaining access routes at all necessary times, retaining sufficient yard or servicing space where relevant, and retaining any existing amenity space such as external seating.

16.31 Parts 1 and 4 expect all types of businesses occupying ground floor spaces in town centres to engage with the street, including maintaining visibility into the business, and providing engaging window displays. Regard should also be had to the Tower Hamlets Shopfront Design Guidance. The Primary Frontages (see Part 1) will have the highest levels of activity and footfall. As such, non-retail uses in these locations should be of a type that enhances the character and attractiveness of the town centre as a place to visit, such as cafés, restaurants and drinking establishments. Other uses would be appropriate on upper floors within the primary frontages, such as offices, gyms, or residential uses. However, access to upper levels must be designed to promote street-level activity and not undermine the viability of ground-level units.

16.32 Due to their unique characters and mix of businesses, part 5 gives specific policy protection to Columbia Road and Redchurch Street. Columbia Road is mainly composed of very small commercial units that house independent artisans. Both the uses and scale of the units contribute to the unique character of street, therefore consolidation of shopfronts and changes of use away from Class E will not be supported. Redchurch Street hosts a mix of small to medium sized retail units that house high-end fashion boutiques and small bars, restaurants and cafes that contribute to their area's night-time economy. In order to protect this important cluster of fashion boutiques, new developments should

ensure that they provide spaces that support these uses, and any proposals non-Class E(a), E(b) or drinking establishment (Sui Generis) uses at ground floor level should demonstrate that they will complement and not undermine the existing mix of uses. More detail regarding night-time uses is provided in Policy T7.

16.33 Part 6 of the policy recognizes that residential uses at ground or basement levels in town centres can provide a substandard level of amenity for residents, with particular issues around privacy. They can also have a sterilising effect on town centres, reducing the vibrancy and vitality of a shopping street and undermining its continuity. Exceptions will be made for residential entrances and lobbies as well as communal space where they support the activation of the street frontage.

16.34 The design, accessibility and layout of town centres will have an important impact upon their success. This policy seeks to promote a range of unit sizes and types within each centre to meet the needs of different users and occupants. In relation to Part 7(a), applicants need to demonstrate that development proposals would not lead to an over-

16.35 supply of particular unit types which confirms that there is a range of unit types across the wider town centre and that there is a need for the size and type of unit being proposed. In addition, the Transport for London's Healthy Streets principles should be applied to the design, accessibility, and layout of town centres in order to ensure they remain attractive and competitive.

16.36 Whilst the changing nature of town centres and consumer demands may mean less need and demand for retail space in some locations, the requirements set out in part 7 where loss of retail (Class



E(a) use) is proposed ensures that any loss will need to be clearly justified (e.g. where units are too large to let as a single entity; therefore subdivision would increase attractiveness to potential occupants).

16.37 However, it is acknowledged that there may be instances where some loss of floorspace within the Primary Frontages contributes to achieving wider objectives, such as the redevelopment of the site or improving access to upper levels. In such cases, street-level retail units should remain of a size and scale that is viable to current or future

occupants and that access to upper levels has been designed so as to not undermine the activity and function of the Primary Frontage. In order to satisfy Part 7, applicants will need to provide examples of other retail units of similar proposed size and layout in the area which are occupied and the types of occupants that such units attract. Information on the local market should also be submitted, including details of retailer demands and lettings in the local area to ensure that development does not result in 'token' retail units being created that are too small for the requirements of occupants.

16.38 Part 8 recognises that the presence of vacant shopfronts and vacant land in town centres can have a significant negative impact on the vitality and viability of the town centres, by reducing the attractiveness of the town centre for customers and reducing footfall. Where a permanent occupier cannot be secured or a site is awaiting redevelopment, the council will support the use of the site for meanwhile uses. These should be uses that enhance the diversity, vitality, and viability of the town centre which, in most cases, will mean uses that engage with the public, such as retail, food and drink, cultural or community uses. The scale of the proposed use, and the traffic it is likely to generate, should reflect the scale of the town centre and its position in the Town Centre Hierarchy as set out in Policy T1. These uses will need to demonstrate that they will not result in significant negative amenity impacts on surrounding occupiers, meaning excess noise pollution, odour, air pollution or light pollution. They will also need to demonstrate that they will not undermine the operations of other businesses within the town centre by, for example, limiting access for deliveries and servicing. The 'move on' plan will need to show how the temporary use will move to a new suitable premise when a permanent occupier takes on the space or it is redeveloped. Where the application

can demonstrate that the use is genuinely temporary in nature – meaning that there will be no loss of employment when the use ceases – a 'move on' plan may not be necessary.

16.39 In accordance with local plan policy EG3, development proposals that include 1,000sqm or more of commercial floorspace are required to provide affordable commercial space. Within town centres, the council may seek affordable space for retail or other public facing, town centre uses.

London Plan policies:

- Eg Retail, markets and hot food takeaways

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts

Evidence base:

- Tower Hamlets Retail and Town Centres Study 2023

Policy TC3 Town centre uses outside our town centres

1. Development proposals for main town centre uses outside of the borough's Metropolitan, District and Neighbourhood Centres, and Site Allocations that include town centre uses, will be subject to:
 - a. a sequential test; and
 - b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace.
2. Development proposals resulting in the loss of Class E(a) retail uses outside of Metropolitan, District or Neighbourhood Centres will only be supported where:
 - a. the shop is within 300 metres walking distance of the nearest alternative Class E(a) retail units; and
 - b. the shop has been vacant for a period of more than 12 months and robust evidence is provided of efforts made to market the shop unit over that period at an appropriate rent (providing examples of three comparable shop units in the vicinity); or
 - c. the site is unsuitable for continued retail use due to its accessibility, size or condition and there is no viable prospect of a retail use on the site, taking account of the projected residential growth in the vicinity.

Supporting text

16.40 New retail development will be directed towards existing centres in accordance with the sequential approach set out in the NPPF which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, subject to meeting the requirements set out in part 1, we recognise that demand for retail also exists in locations outside of Metropolitan, District and Neighbourhood Centres to meet the immediate convenience needs of local people and/or support the function of designated employment locations.

16.41 New retail units or extensions outside of the centres set out in part 1 should not exceed 200 square metres gross floorspace to ensure that they are local in nature and do not harm the vitality and viability of existing centres. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF. The primary shopping areas of the Metropolitan and District Centres are illustrated on the Policies Map. For Neighbourhood Centres, their boundaries (as illustrated on the Policies Map) will equate to the primary shopping areas of these centres.

16.42 The CAZ and Tower Hamlets Activity Areas have a unique role in the town centre hierarchy. New retail uses may be appropriate in these areas, especially those of a smaller scale, where they would not detrimentally affect the vitality and viability of Metropolitan, District or Neighbourhood Centres. A judgement-based approach will be taken to proposals within these areas and a sequential test and/or impact assessment may still be required where a proposal has a potentially adverse impact on one or more Metropolitan, District or Neighbourhood Centre.

16.43 Part 2 contains a general presumption against the loss of retail space outside of town centres to ensure that residents have access to essential goods and services in close proximity to their homes. However, in certain circumstances, such losses may be justified. Applicants should outline where and how marketing has been undertaken, including evidence of advertising on national commercial and retail property websites and a realistic asking rent. However, it is recognised that in some cases requiring marketing evidence may be counterproductive to enhancing local character if the condition of the property is such that attempting to let it would be unrealistic. In such cases, the applicant should submit a detailed report on the history and condition of the property to robustly justify why marketing evidence should not be required and that re-provided retail space as part of redevelopment would not be viable at the location.

London Plan policies:

- Eg Retail, markets and hot food takeaways

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts

Evidence base:

- Tower Hamlets Retail and Town Centres Study 2023



Policy TC4 Markets

1. Development proposals must support the protection, retention, and enhancement of existing markets. Development proposals in the vicinity of an existing market must demonstrate that:

- a. they demonstrate that the overall quality of the market and public realm will be improved;
- b. the capacity for existing numbers of pitches is maintained, and
- c. they protect or re-provide appropriate storage, waste collection and servicing facilities.

2. Development proposals in the vicinity of existing markets should seek out opportunities to enhance those markets through the provision of storage, welfare facilities for market traders, enhanced public realm and facilities for customers, and complementary uses.

3. Development proposals for new markets, including farmers' markets and 'street food' markets, will be encouraged where they do not undermine the viability or vitality of existing markets. They will be directed to Metropolitan, District or Neighbourhood Centres and should enhance the centre's existing offer and contribute to vitality and cohesion.

4. Development proposals for new markets outside of Metropolitan, District or Neighbourhood town Centres will only be supported where they:

- a. are temporary in nature;
- b. bring vacant sites back into use;
- c. do not undermine the borough's existing markets and town centres; and
- d. do not cause unreasonable harm to the amenity of surrounding properties, particularly where evening and night-time markets are proposed.

Supporting text

16.44 Tower Hamlets is known for its distinct and diverse markets. Whitechapel, Roman Road, Bethnal Green and Watney Market play an important role serving local immigrant communities. Crisp Street retains a tangible link to East End History. Columbia Road attracts visitors from across London and beyond to its weekly flower market. Brick Lane Market reflects the changing and mixing communities of the new East End.

16.45 It is widely recognised that markets act as magnets to create interest and draw people into town centres and support footfall which benefits other businesses. They can also act as incubation space for new ideas and small-to-medium enterprises. This policy aims to protect the borough's existing markets and ensure that new development does not undermine their future role and function (e.g. ensuring that storage facilities are maintained).

16.46 Part 1 of this policy refers to the protection of our existing street markets at Bethnal Green, Brick Lane, Crisp Street, Columbia Road, Petticoat Lane, Roman Road, Roman Road Square, Stroudley Walk, Watney Street and Whitechapel City, as well as the Spitalfields covered market.

16.47 Part 2 supports development proposals in the vicinity of existing markets to enhance the functionality, viability, and vitality of those markets through the provision of secure storage space and other servicing facilities, welfare spaces for market traders, enhanced public realm and facilities for customers (including public toilets), and complementary uses. Where a proposal is in the vicinity of an existing market, the applicants should engage with the council's markets team and the market trader associations at an early stage to ensure that any opportunities to enhance the market are pursued.



16.48 In order to meet the requirements of part 3, applicants and developers proposing new markets should work with our markets team at the earliest opportunity so that information can be provided with the planning application to show that sufficient space will be safeguarded to meet the needs of traders in terms of servicing and storage. Proposals should also detail how the types of goods and services proposed would complement rather than compete with surrounding town centres, as well as how they could contribute to other priorities such as improving access to healthy, affordable food. In addition, a written management and design strategy should be provided which outlines how the proposal will avoid causing negative impacts on markets, such as congestion on footpaths and roads, litter, poor refuse storage and noise.

16.49 While new markets within Metropolitan, District or Neighbourhood Centres are favoured, part 4 also recognises that there may be opportunities for markets outside of town centres where they activate vacant spaces.

16.50 Where proposals seek to re-activate vacant spaces or empty shops, temporary permissions will be favoured. Applicants should demonstrate that the proposed market will have a different offer to nearby Metropolitan, District or Neighbourhood Centres to avoid undermining them. They should also demonstrate that noise impacts will be mitigated to protect the amenity of surrounding properties, especially housing.

London Plan policies:

- Retail, markets and hot food takeaways

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design

Evidence base:

- Tower Hamlets Retail and Town Centres Study 2023

Policy TC5 Food and drink

1. Development proposals for cafes, restaurants and drinking establishments (Use Classes E(b) and Sui Generis) will be supported within the CAZ, Tower Hamlets Activity Areas, and town centres (as shown in the Policies Map) provided that:
 - a. they support the role and function of the town centre, having regard to its position in the hierarchy; and
 - b. where proposed within Primary or Secondary Frontages or Columbia Road or Redchurch Street Specialist Centres, they meet the requirements set out in Policy TC2.
2. Development proposals for cafes/restaurants and drinking establishments (Use Classes E(b) and Sui Generis) in Neighbourhood Parades and outside of the town centre hierarchy will be supported provided that:
 - a. cafes and restaurants (Class E(b) uses) can demonstrate that the proposal would support surrounding uses and would not
 - b. undermine the function of nearby town centres, or form part of a concentration of uses that would cumulatively cause harm to the viability of the borough's town centres;
 - c. drinking establishments (Sui Generis use) are local in nature and scale; and
 - d. a drinking establishment outside of a town centre that is associated with, and on the same site as or adjacent to a brewery or distillery may be acceptable where it does not have a significant negative impact on the amenity of neighbouring occupiers.
3. The use of outdoor areas that are ancillary to the relevant use, including garden areas, rooftops, forecourts, and pavements in association with food and drink uses will be supported where:
 - a. this would not cause unacceptable harm to the amenity of adjoining occupiers and uses and the area generally, taking into account the size and type of the proposal, the hours of the use proposed and the nature and character of the area; and
 - b. in the case of pavements, the width of the footway is adequate to allow this without obstructing pedestrian flow, and the use is arranged so as not be a hazard to people with disabilities, older people, and families with small children.
4. Development of hot food takeaways (Sui Generis use) will only be supported within the CAZ, Tower Hamlets Activity Areas, Canary Wharf Metropolitan Centre, Secondary Frontages of District Centres, Neighbourhood Centres and Neighbourhood Parades where they meet the following criteria:
 - a. there must be a separation distance of at least four non-hot food takeaway units between each new hot food takeaway unit;
 - b. the percentage of hot food takeaway units would not exceed 5% of the total number of units within Metropolitan, District or Neighbourhood Centres;
 - c. within Neighbourhood Parades there would be no more than one hot food takeaway unit;
 - d. the proposal is not within 400 metres walking distance from an existing or proposed school and/or local authority leisure centre;
 - e. the proposal will not harm the amenity of surrounding properties;

- f. drive-through takeaways will not be supported and proposals for the redevelopment of existing drive-through takeaways for other uses will be supported, subject to other development plan policies; and
 - g. hot food takeaway businesses are expected to achieve and operate in compliance with the Healthier Catering Commitment standard.
5. Development proposals for food and drink uses where home delivery of food is proposed will be supported where they demonstrate that:

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- a. the scale of the operation, locations of delivery collection points, locations for parking of delivery vehicles and hours of operations will not result in negative impacts on the amenity of neighbouring residential dwellings and the operations of neighbouring businesses;
- b. sufficient welfare facilities are provided on site to meet the needs of the delivery drivers/riders, including toilets and rest areas; and
- c. delivery operations will not impede the footway or roadway, taking into account the needs of people with disabilities, older people, and families with small children.

Supporting text

16.51 Where the policy refers to food and drink uses, these include restaurants, cafés, pubs, and other drinking establishments. Hot-food takeaway uses (Sui Generis) are addressed separately within part 3 of the policy.

16.52 Part 1 recognises that food and drink businesses play an important role in town centres. As the demand for traditional retail has diminished, restaurants, cafes, bars, and pubs are increasingly acting as anchors and Metropolitan attractors to town centres. These businesses can also play an important role in supporting their local communities. Cafes and pubs provide spaces for local residents, workers, students and visitors to meet and socialise. They also often host events and provide space for formal community meetings. Restaurants can often reflect the diverse backgrounds of the local community and establish a sense of place within a town centre. This is evident in all the borough's town centres, but especially in Brick Lane, where the South Asian restaurants are a key element in the character of the high street and attract visitors from across London and beyond. Food and drink businesses are encouraged to support and reflect the diverse communities within their local areas.

16.53 Primary Retail Frontages are the core shopping areas of district centres. While food and drink businesses can contribute to the vitality and viability of these areas, it is important that they not undermine their retail function. As such, uses other than E(a) retail proposed on Primary and Secondary Shopping Frontages are required to meet the test of Policy TC2.

16.54 While food and drink uses are directed to Metropolitan, District and Neighbourhood Centres and the CAZ and Tower Hamlets Activity Areas, part 2 recognises that there are some circumstances in which these businesses may be appropriate in Neighbourhood Parades and

outside of the town centre hierarchy. Examples might include facilities that enhance the enjoyment of open spaces and water spaces; serve transport interchanges or serve out-of-town-centre employment areas. For instance, pubs play an important role as community meeting spaces and can often be located in otherwise wholly residential areas or industrial areas. Tower Hamlets also contains a number of micro-breweries and distilleries. These are often located within industrial areas and may include tap rooms or bars. The primary use of these facilities should be the production of beverages, and the bar or tap room should take up a relatively small proportion of the floor area. A condition may be imposed limiting the size of the bar or tap room to ensure that it remains a secondary use.

16.55 Within Neighbourhood Parades and non-designated locations, proposals involving food and drink uses should be of a more modest scale than might be expected in larger town centres. Applicants should robustly state why a café, restaurant or drinking establishment would be appropriate in such a location. Details of any other cafés, restaurants or drinking establishments in the local area should also be provided to mitigate the risk of clusters developing that could undermine nearby town centres. In respect of drinking establishments, a detailed management plan should be submitted alongside the planning application confirming that it will be run as a 'community' public house and that conflicts with neighbouring properties would be avoided. Applicants would also be encouraged to consider our statement of licensing policy.

16.56 Part 3 recognises that the use of outdoor space, including garden space and front pavement/forecourt space, by food and beverage businesses can enhance the vitality of a town centre by making the use more visible and engaging with the public realm. It can also improve the viability of the businesses by increasing their space to accommodate



customers and making the businesses more attractive to potential customers. While the use of outdoor spaces for food and drink uses is broadly supported in town centres, it is essential to ensure that these uses do not have a negative impact on neighbouring occupiers in terms of amenity. Applicants should demonstrate that the use of the outdoor space will not have a significant negative impact on neighbouring residential occupiers in terms of noise, odours or fumes and will not impede the operations of other businesses through a reduction in useable yard, street, or alley space. Where the outdoor use is proposed adjacent to the footway, the applicant will need to demonstrate that it will not impede pedestrian traffic or undermine access by those with

disabilities and other street users who require additional clear footway space.

16.57 With a commitment to improve the health of its residents and to reducing childhood obesity, part 4 of this policy restricts hot food takeaway businesses within 400 metres from a school or council leisure centre, which equates to a walking time of 10 minutes and will help to reduce young people's access to unhealthy food options. 400 metres will be calculated on the basis of the shortest walking distance from the entrances and exits of an existing or proposed primary or secondary school. In order to satisfy part 4, planning applications will be expected to include information (including town centre surveys) in order to ensure that any provision of new hot food takeaways would not exceed the levels set out in parts (a) to (c). Development proposals for hot-food takeaways should also have regard to the Health Impact Policy. This policy may be applied flexibly within the Canary Wharf Metropolitan Centre, where hot food takeaways typically support local workers and are unlikely to attract young people.

16.58 Drive-through takeaway businesses encourage the use of private vehicles and create unfriendly and in some cases unsafe pedestrian and cycle environments. Therefore, new drive-through takeaways will not be supported, and the council will generally support schemes that propose to redevelop existing drive-through takeaways where they accord with other relevant policies.

16.59 Food businesses where all, or a significant proportion, of the business is via delivery can have a significant impact on the public realm and on the amenity of surrounding occupiers. This includes both 'dark kitchens' – food businesses that cater only to delivery customers, and traditional restaurants and takeaways with a high level of delivery business. Where these businesses are located on busy

high streets, delivery drivers waiting for orders and their cycles can act as obstacles to pedestrian traffic and in particular to disabled and mobility-impaired users, those with visual impairments, parents with buggies and other pedestrians with large baggage. Businesses with a significant delivery component should provide a Delivery Management Plan that demonstrates that waiting delivery drivers and their cycles can be accommodated off the pavement, and the pavement should only be used in exceptional circumstances where the pavement is particularly wide and has an exceptionally low level of pedestrian traffic. The Delivery Management Plan should also demonstrate the provision of welfare facilities for the delivery drivers, including toilets and rest areas. The Delivery Management Plan, and the level of accommodation proposed should be proportionate to the scale of the business and its expected level of delivery; for example, an application for a 'dark kitchen' will need to provide more significant welfare facilities for drivers and dedicated space off-street to accommodate drivers and their cycles.

London Plan policies:

- Eg Retail, markets and hot food takeaways

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts
- Cl4 Public houses

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- Tower Hamlets Hot Food Takeaway Topic Paper, 2023
- London Takeaways Toolkit, 2012

Policy TC6 Entertainment uses

1. Development proposals for new betting offices/shops (Sui Generis use) will only be supported within the CAZ, Tower Hamlets Activity Areas, Canary Wharf Metropolitan Centre or Secondary Frontages within District Centres where they can demonstrate that:
 - a. the proposed development is not within 400m walking distance of an existing gambling establishment;
 - b. the site is not in close proximity to a school or sensitive community or cultural facility; and
 - c. the proposal would not have a negative impact on the amenity or character of the area.
2. Casinos and other gambling establishments will only be supported within the CAZ or Canary Wharf Metropolitan centre where they can demonstrate that:
 - a. the proposed development is not within 400m walking distance of an existing gambling establishment;
 - b. the site is not within close proximity to a school or sensitive community or cultural facility; and
 - c. the proposal would not have a negative impact on the amenity or character of the area.
3. Development proposals for other commercial leisure uses, including gaming arcades and competitive leisure businesses (e.g. escape rooms, mini golf, bowling alleys and VR sports) will be directed to the CAZ, Metropolitan Centre, District Centres, Tower Hamlets Activity Areas and Neighbourhood Centres in accordance with the scale of the proposed facility.
4. The commercial leisure uses listed in part 3 will only be supported in Neighbourhood Parades or outside of the town centre hierarchy where:
 - a. it can be demonstrated that such uses will not result in adverse impacts on the amenity of the surrounding area; and
 - b. the location has good public transport accessibility.

Supporting text

16.60 Parts 1 and 2 recognise that concentrations of betting shops, casinos and other gambling establishments present a high level of risk to those with gambling addictions or those susceptible to addiction. Concentrations of these businesses allow those with addictions to by-pass safeguards limiting betting levels by visiting multiple establishments. Given that Tower Hamlets has a high proportion of residents at risk of problem gambling, parts 1 and 2 set a strict limit on the concentration of these establishments, requiring a separation distance of 400m, which is about a 5-minute walk. Betting shops and other gambling establishments also have a negative impact on the wider town centre by reducing footfall relative to other town centre uses and by creating an impression of blight in the area. They also carry a risk of attracting anti-social behaviour.

16.61 It should be noted that facilities for gambling, including betting shops and casinos require a license from the council to operate. This is separate from the planning regime.

16.62 Part 3 recognises that commercial leisure businesses can act as attractors and support the vitality and viability of town centres. These uses will be directed to town centres in accordance with their scale and with regard to the town centre hierarchy. Proposals for these uses, where they intend to operate in the evening or at night should have regard to Policy TC7. Where these uses are Arts and Culture facilities (including cinemas, theatres, live music venues and nightclubs) they should also have regard to Policy C5.

16.63 Part 4 recognises that commercial leisure businesses may be appropriate in neighbourhood parades and outside the town centre hierarchy, but must demonstrate that the site has good public transport access to ensure that visitors can access the business sustainably, and that it will not have a negative impact on surrounding residents.

London Plan policies:

- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts
- CI5 Arts and culture facilities

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- Tower Hamlets Betting Shops Topic Paper, 2023
- Culture and Night Time Economy, SPG 2017

Policy TC7 Evening and night-time economy

1. Proposals for food, drink, leisure, and entertainment uses operating in the evening and at night will be supported in Metropolitan, District and Neighbourhood Centres and in the CAZ and Hackney Wick and Fish Island Creative Enterprise Zone, where they:
 - a. have regard to the strategic night-time economy designations listed in Part 2 of Policy T1 of the London Plan;
 - b. do not contribute to an overconcentration of particular uses that could give rise to negative cumulative social impacts;
 - c. contribute to the diversification of the evening and night-time activities within the town centre; and
 - d. are accompanied by a management plan, setting out mitigation measures for any negative impacts.
2. Proposals for evening and night-time activities outside of the town centre hierarchy will only be supported where:
 - a. they provide robust justification demonstrating why the use cannot be located in a town centre;
 - b. the location has a high level of night-time public transport accessibility; and
 - c. they are accompanied by a management plan, setting out mitigation measures for any negative impacts.
3. Proposals for late-opening and 24-hour shops, services and cafes will be supported in Metropolitan, District and Neighbourhood Centres, particularly where they serve an area with a large number of evening and night-workers, such as around the Royal London Hospital and Brick Lane. Proposals for late opening and 24-hour shops and cafes should ensure that they do not give rise to significant negative amenity impacts for neighbouring occupiers.
4. The Agent of Change principle will be applied to all new noise-sensitive development in close proximity to existing night-time economy uses and in designated night-time economy centres.

Supporting text

16.64 The evening and night-time economy refers to businesses, organisations and activities that operate between the hours of 6pm and 6am. While it is traditionally associated with food and drink and cultural activities, it also includes late-opening retail businesses, as well as the many workers outside of these industries that work at night, including hospital workers, bus drivers, and wholesale market workers among many others.

16.65 Part 1 recognises that evening and night-time food, drink, leisure and culture businesses and organisations are an important part of the Tower Hamlets economy and contribute to the vitality, vibrancy, and sense of place of our town centres.

16.66 Proposals for night-time economy uses should be related in scale and nature to the centre in which they are proposed and its classification as a night-time economy centre in Policy TC1 and in the London Plan. Larger-scale night-time leisure uses, such as nightclubs and larger cinemas would normally be directed to the Canary Wharf Metropolitan Centre and Brick Lane District Centre, while smaller-scale night-time uses such as bars, smaller cinemas, small to medium sized theatres and music venues would be directed to all centres listed in point 2 of Policy TC1.

16.67 Large concentrations of night-time uses, particularly those that are focused on alcohol consumption, can have negative impacts on the amenity and safety of the surrounding area. They can also reduce the daytime vitality and viability of the town centre if they are only open from the evening. It is, therefore, important to ensure that the development of new night-time uses does not result in an overconcentration. Applicants should provide information on the number of similar uses that operate



in the evening and at night within the centre to demonstrate that the proposed development will not result in an overconcentration.

16.68 Tower Hamlets is a diverse borough and includes many residents for whom night-time activities involving the consumption of alcohol are not desirable. As such, the council will generally be supportive of proposals that seek to diversify the night-time economy and propose uses operating at night that are not oriented around the consumption of alcohol; for example, late-opening cafes and dessert parlours. In addition, many night-time activities exclude those who lack the resources to pay for drinks or food. The council will generally support proposals that include night-time activities that are free or low-cost and

particularly those that provide space and activities for young people.

16.69 In order to ensure that any impacts of night-time uses are adequately mitigated, proposals for evening and night-time entertainment and leisure uses will be expected to submit a management plan. The management plan must show how any potential amenity impacts arising from the proposed development, including noise, odours, fumes, and anti-social behaviour will be mitigated. The management plan should be proportionate to the scale of the proposal and to the type of use being proposed. It may include measures to disperse customers after an event, details of security arrangements to limit anti-social behaviour, proposed hours of operation and methods to limit smoking outside of the building among other matters.

16.70 The council also encourages night-time uses to sign up to schemes that seek to improve the safety of leisure and night-time activities, particularly those that involve the consumption of alcohol. Such schemes include 'Ask for Angela' and National Pubwatch.

16.71 Given the town centres first approach taken by the Local Plan, the London Plan and the NPPF, Part 2 requires proposals for night-time uses outside of town centres to robustly demonstrate that they cannot be accommodated in a town centre location. Where night-time uses are proposed outside of the town centre hierarchy, they should demonstrate that the site has good night-time public transport accessibility, meaning that the site is within 400m (roughly a 5-minute walk) of a night bus stop or night tube station.

16.72 Tower Hamlets has many workers and residents who work in the evening and at night. In order to better serve those who do not have access to shops and services during normal business hours, part 3 encourages late-opening and 24-hour shops and services in

the borough's town centres, and in particular those centres with large concentrations of night workers, such as Whitechapel City and Brick Lane.

16.73 Part 4 recognises that the London Plan has established the 'Agent of Change' principle, whereby it will be the responsibility of a new development to sufficiently mitigate any impact existing uses might have on its occupiers. In the case of development in town centres with a significant night time economy, new residential development will be required to provide sufficient soundproofing and to be oriented in a way to ensure that residents do not experience unreasonable levels of noise from night-time uses.

London Plan policies:

- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy

Local Plan policies:

- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS9 Shopfronts
- CI4 Public houses
- CI5 Arts and culture facilities

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- Night Vision: Rebuilding London's Night-Time Economy, 2021
- Culture and Night Time Economy SPG, 2017

Policy TC8 Short-stay accommodation

1. Development proposals for visitor accommodation will be supported in locations within the CAZ, Canary Wharf Metropolitan Centre, Tower Hamlets Activity Areas and District Centres (as shown on the Policies Map) or along primary routes where adjacent to transport interchanges, where it can be demonstrated that:

- a. the size, scale and nature of the proposal is proportionate to its location;
- b. the applicant can demonstrate that there is sufficient demand for the proposal within the local area;
the proposal would not compromise the supply of C3 self-contained homes and would not undermine the Borough's ability to deliver against strategic housing and employment targets; and
- d. the applicant can demonstrate adequate access and servicing arrangements appropriate to the scale, nature, and location of the proposal.

Supporting text

16.74 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.

16.75 Part 1 seeks to steer visitor accommodation towards the CAZ, Canary Wharf Metropolitan Centre, Tower Hamlets Activity Areas, and the borough's District Centres, or in other locations with very good public transport accessibility.

16.76 Part 1(a) expects development proposals for short stay accommodation to be of a size that reflects their surrounding built environment and reflects the function of the location within town centres or employment areas. For example, a large-scale hotel that is appropriate in the Metropolitan Centre of Canary Wharf may not be suitable within a smaller District Centre.

16.77 Part 1(b) seeks to ensure development proposals for short stay accommodation are responding to demand. In order to comply with this policy requirement, applications should include an assessment of the level of demand and supply of visitor accommodation within the relevant sub-area. This assessment should have regard to the type of accommodation proposed and its price point, and should include consented and proposed visitor accommodation in addition to that currently operating.

16.78 In order to comply with Part 1(c), development proposals will need to demonstrate that the proposed site is not allocated for residential or employment development within a site allocation or employment designation and does not have an extant planning permission for residential or employment development.

16.79 In accordance with Part 1(d), development proposals for short stay accommodation will need to submit information detailing how customers would access the accommodation - there is a general expectation that most visitors staying in hotels in Tower Hamlets will be accessing their accommodation by public transport, but taxi and other vehicle drop-off spaces may be required depending on the scale of the proposal. This would also apply to any vehicles required to service the accommodation (e.g. to handle laundry and deliver other supplies to the accommodation).

16.80 It should be demonstrated that such movements would not create unacceptable impacts on residential amenity or highway safety in accordance with Policies D.DH8 and D.TR2.

16.81 This policy applies a flexible approach to the assessment of new visitor accommodation. This recognises the different markets that various forms of visitor accommodation may serve, and the way in which customers and service vehicles may access such accommodation. For example, traveller hostels, budget hotels and small boutique hotels are less likely to require significant space for coaches and other vehicles setting down and picking up movements as customers are more likely to arrive via public transport.

16.82 For serviced apartments, development will be required to provide the following details:

- management will ensure rooms will not be occupied for periods of 90 days or more;
- management will provide 24-hour servicing;
- 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
- management will have access to the room.

London Plan policies:

- E10 Visitor Infrastructure

Local Plan policies:

- HC1 Meeting housing needs
- PS1 Design- and infrastructure-led approach to development
- PS2 Tall buildings
- PS3 Securing design quality
- PS4 Attractive streets, spaces and public realm
- PS5 Gender Inclusive Design
- PS8 Shaping and managing views
- EG1 Creating investment and jobs

Evidence base:

- Tower Hamlets Retail and Town Centres Study, 2023
- London-wide projections of demand and supply for visitor accommodation, 2017

17. Community infrastructure

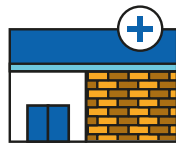
Cl1 – Supporting community facilities

Cl2 – Existing community facilities

Cl3 – New and enhanced community facilities

Cl4 – Public houses

Cl5 – Arts and culture facilities



Introduction

17.1 Tower Hamlets has a range of community facilities such as health, social, education, leisure, cultural, and sport facilities providing valuable services to both local communities and visitors. The provision of these essential community facilities plays a vital role in creating and sustaining healthy and liveable neighbourhoods.

17.2 Parks and open spaces are also key elements of community infrastructure that are a vital part of the borough, improving the health and well-being of communities by enabling social interaction, providing informal meeting spaces, and facilitating active lifestyles and recreation. These spaces must be protected and enhanced and are covered in the biodiversity and open space section of this Local Plan.

17.3 Community facilities are facing increased pressure from higher land value uses, such as housing and employment. In the face of limited public funding and a fast-growing population, it is important these facilities are still able to maintain their offer of such valuable services. In particular by opening up opportunities for all residents, including young people and women, to participate in a wide range of local sporting and cultural opportunities. Facilities away from home, work, and school – such as libraries, community centres and parks – provide an important space for social interaction to occur and for the community to gather, bringing people from different backgrounds together and promoting understanding. The protection and support of these community facilities is essential to help empower communities, fight crime and support underrepresented groups in Tower Hamlets.

17.4 The following policies will seek to promote and facilitate the delivery of essential community facilities through new development (including changes of use, extensions, and new builds) in line with the Infrastructure Delivery Plan, which outlines the existing capacity and future needs and priorities facing some of the community facilities in the borough. In particular, the policies in this chapter aim to ensure that sufficient facilities are provided to meet the needs of the borough's growing population in the areas of greatest need and growth, such as the borough's site allocations.

17.5 This section contains the following policies:

- Policy CI1: Supporting community facilities
- Policy CI2: Existing community facilities
- Policy CI3: New and enhanced community facilities
- Policy CI4: Public houses
- Policy CI5: Arts and culture facilities



Policy C11 Supporting community facilities

1. The council will support development proposals which seek to protect, maintain, and enhance existing community facilities.
2. The council will expect development proposals to contribute to the capacity, quality, usability, inclusivity, and accessibility of existing community facilities, particularly where development will increase demand for the facility.
3. The council will expect development proposals to maximise opportunities for the provision of high-quality community facilities, designed to maximise adaptability and flexibility to offer a mix of different functions to serve a wide range of users. Where possible, facilities or services should be accessible to the wider community outside of core hours and co-located or shared to encourage multi-purpose trips and best meet the needs of different groups and delivering social value to the community.
4. New community facilities will be directed towards the borough's centres in accordance with the town centre hierarchy and/or to locations which are accessible to their catchments depending on the nature and scale of the proposal.
5. The council will expect strategic development proposals for residential development to deliver a community facility on-site, where evidence demonstrates a need for the local area.

Supporting text

17.6 This policy seeks to maintain an adequate supply and range of community facilities across the borough to serve local needs and support the creation of more liveable and sustainable places. Delivery of new and improvements to existing community facilities will be achieved through the use of developer contributions (as identified in Policy DV5) and working together with partners to ensure adequate services are in place to support the sustainable growth of the borough.

17.7 For the purpose of this policy, community facilities include a range of social infrastructure that provide services to the community such as:

- indoor sports and leisure facilities (e.g. leisure centres and swimming pools);
- health facilities (e.g. hospitals and doctor surgeries);
- cultural facilities (e.g. art galleries, music venues, museums, nightclubs, cinemas and theatres);
- education facilities (e.g. schools, nurseries and universities); and
- social facilities (e.g. places of worship, libraries, Idea Stores, local presence and public houses).

17.8 Playing fields and outdoor sport facilities, such as multi-use games areas and tennis courts, are also important community facilities. These are addressed within policies BO1 and DV1.

17.9 Part 1 of the policy states that development proposals that will protect, maintain, and enhance community facilities will be supported, to ensure that sufficient and high-quality provision is available to meet local needs.

17.10 Part 2 promotes opportunities to expand or improve the capacity and accessibility of existing facilities, taking account of future projected



community needs (as set out in the Infrastructure Delivery Plan).

17.11 Part 3 seeks to encourage the provision of multi-purpose and shared services which provide opportunities to co-locate or integrate a range of community uses and functions, such as community halls and sport facilities. Consideration should be given to promoting community facilities which can be easily accessed, support a wide range of users in line with the principles of active and inclusive design and make relevant provision outside of core hours, particularly in respect of childcare provision, external recreation space, sport facilities and appropriate classroom space.

17.12 Part 4 seeks to ensure that community facilities are located within or at the edge of town centres in line with policies TC1 and DV1. These locations are considered to be the most accessible places in the borough and such uses contribute to the vitality and viability of town centres. In addition, new facilities will be directed towards locations which are accessible to their catchment areas through strong public transport links and by prioritising active travel.

17.13 This policy will be delivered in accordance with the Infrastructure Delivery Plan and other relevant strategies, including the Indoor Sports Facilities Strategy, Open Space Strategy, Green Grid Strategy, and area-based masterplans. We will continue to work with key stakeholders and other service providers to ensure that new community facilities are provided at locations where there is a clearly demonstrated need.

17.14 Part 5 of this policy requires development proposals to provide an on-site community facility as part of strategic residential development applications where up to date evidence demonstrates that this is required. Such provision would need to support and reflect the needs of the borough's culturally diverse community. Applicants must engage with the council's planning team as early as possible to determine the nature of the community facility, and ensure it will be meeting the needs of the local area. Applicants must demonstrate through the pre-application and application stage how the provision of the community facility has been considered as part of the design process, and that consultation has been undertaken with local residents and key stakeholders to determine what facilities are likely to be appropriate. The council will expect such provision to be made unless design constraints and/or viability make such a facility undeliverable or there is a clear justification that residents of the proposed development and surrounding area have access to a proximate community facility.

London Plan policies:

- S1 Developing London's social infrastructure
- SD8 Town centre network

Local Plan policies:

- DV1 Areas of growth and opportunity within Tower Hamlets
- DV5 Developer contributions
- DV6 Promoting Social Value
- TC1 Supporting the network and hierarchy of centres
- BO1 Green and blue infrastructure
- MC2 Active Travel and healthy streets

Evidence base:

- Planning for Sport Guidance, 2019
- Active Design, 2015
- Tower Hamlets Infrastructure Delivery Plan, 2023
- Planning and Social Cohesion Evidence Base, 2020
- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Water Space Study, 2017
- Leisure Facilities Strategy, 2018
- Leisure Needs Assessment, c. end of 2023
- Physical Activity and Sport Strategy, 2019
- Tower Hamlets Community Facilities Audit, 2023



Policy CI2 Existing community facilities

1. Development proposals must retain existing community facilities unless it can be demonstrated that:
 - a. there is no longer a need for the facility or any alternative community use within the local community; or
 - b. a replacement facility of similar nature that would better meet the needs of existing users is provided.
2. Where community facilities are re-provided on site as part of the development proposal, the quality, inclusivity, and accessibility of these facilities (including public access) should be enhanced.
3. Development proposals should ensure the re-provided facility remains viable and accessible to the local community, while prioritising the existing use staying open until the re-provided facility is operational. The development proposal must demonstrate the following measures have been taken as part of any re-provision:
 - a. early engagement with the facility operator, and an agreement met on the quality of the re-provided space;
 - b. analysis of market rents for comparative uses in the area to demonstrate the affordability of the re-provided facility;
 - c. re-provision of a sufficient fit out for the successful operation of the facility as agreed with the existing operator; and
 - d. a local decant strategy is put in place where appropriate when maintaining no break in provision of the facility on site is demonstrated to not be possible, with costs of this met by the development proposal.
4. Extensions to existing schools should demonstrate that:
 - a. there is a local need; and
 - b. the current level of child play space will be enhanced and increased.
5. Development proposals that would result in an existing community facility remaining closed for an extended period of time should provide a temporary facility that allows the community facility to continue operating until a permanent space can be occupied.

Supporting text

17.15 This policy seeks to protect and enhance the borough's existing community facilities where they are still needed to adequately meet local needs.

17.16 Part 1 seeks to resist the loss of the borough's valuable community facilities, except in certain circumstances, see (a) and (b). Statements from relevant providers confirming that the existing or any alternative community uses would not be needed or possible in the premises will be required. Where the loss of a community facility is justified, the applicant will need to explore the opportunity to accommodate an alternative community use which would better meet local needs, in accordance with relevant strategies, including the Indoor Sports Facilities Strategy, Open Space Strategy, and Infrastructure Delivery Plan. Loss of sports and recreational facilities will only be justified where an applicant can provide a robust assessment demonstrating surplus provision or where the proposal includes a replacement of the facility with at least an equivalent function, quality and quantity of sport provision that better meets the needs of the community.

17.17 The council recognises that in certain circumstances site redevelopment will require the relocation of existing uses to a location where the needs of the users will be more adequately met. To ensure that there is no unacceptable disadvantage to existing users, re-provision of community facilities should be within the relevant catchment area and should result in quality and access improvements, reflecting the principles of active and inclusive design. Proposals should also demonstrate that adequate floorspace in an appropriate configuration is provided to ensure the continued viability of the facility including any amenity space that can be used for wider community



uses, and this should not result in a net loss of floorspace unless justified by demonstrating that the floorspace lost is surplus to need.

17.18 Part 2 seeks to ensure that new development facilitates and promotes greater public access through good and inclusive design and signage.

17.19 Part 3 seeks to ensure that the re-provided community facility remains viable for the operator and stays affordable for the local community and users. Early engagement and an agreement with the facility operator must be established to ensure their requirements would be met and that the re-provided facility remains viable for them.

Analysis of market rents for comparative uses in the area should be provided in order to demonstrate the affordability of the re-provided facility. The development proposal must include the reprovision of a sufficient fit out for the successful operation of the facility as agreed with the existing operator. Where practicable, the replacement facility should be provided before the existing facility ceases operation to ensure that local people continue to receive a high-quality service. However, where maintaining no break in provision of the facility on site is not possible, a local decant strategy should be put in place, with the developer and not the community facility operator meeting the costs of this, agreed via a planning obligation.

17.20 Part 4 seeks to ensure that any extension to an existing school results in an increase of existing child play space to accommodate the additional needs arising from the development, with a view to promoting shared community use in line with Sport England's guidance. Proposals to replace indoor sports and recreational facilities must be of at least equivalent function, quality, and quantity and in a suitable location.

17.21 Part 5 seeks to ensure that there is no significant gap in the provision of a community facility as a result of redevelopment. The length of time that would constitute 'an extended period of time' for the purposes of this policy will vary depending on the nature of the community facility and the community it serves, but in any case a closure of more than three months will require the provision of a temporary facility. The temporary facility should be designed in conjunction with the community facility operator and should meet their needs. Its location should be in close proximity to the existing facility, and should be easily accessible to the community that the facility serves.

London Plan policies:

- S2 Health and social care facilities
- S3 Education and childcare facilities
- S4 Play and informal recreation
- S5 Sports and recreation facilities

Local Plan policies:

- PS5 Gender Inclusive Design
- MC2 Active Travel and healthy streets
- DV5 Developer contributions
- DV6 Promoting Social Value

Evidence base:

- Planning for Sport Guidance, 2019
- Active Design, 2015
- Health Building Note 00-01, General design guidance for healthcare, 2014
- Baseline designs for schools: guidance, 2014
- Area Guidelines for Mainstream Schools, Building Bulletin 103, 2014
- Tower Hamlets Infrastructure Delivery Plan, 2023
- Planning and Social Cohesion Evidence Base, 2020
- Tower Hamlets Indoor Sports Facilities Strategy, 2017
- London of Borough of Tower Hamlets School Design Guide, 2021
- Tower Hamlets Leisure Facilities Strategy, 2018
- Tower Hamlets Leisure Needs Assessment, 2023
- Physical Activity and Sport Strategy, 2019
- Tower Hamlets Community Facilities Audit, 2023

Policy CI3 New and enhanced community facilities

1. Development proposals for new community facilities will be directed towards the identified town centre locations. Development proposals involving the provision of community facilities located outside the borough's town centres will be supported where an up-to-date and robust local need can be demonstrated.
2. Development proposals for new community facilities should demonstrate that early consultation has been undertaken with the intended operator and users of the space. All community facilities must be culturally sensitive and reflect the needs of the diverse communities living in the borough. This should include evidence of a co-design process to ensure the new facility best meets the needs of the local community.
3. New community facilities should ensure they charge fees affordable to members of the community, and community facilities within larger developments should be easily accessible to people, and inclusive of the borough's diverse range of users who live and work outside of the host development.
4. Development proposals for new community facilities or for extensions and enhancements to existing facilities should be of high design quality, including:
 - a. being designed to maximise adaptability over their lifetime demonstrating that the space can accommodate a range of role requirements, to ensure it serves the changing needs of the local community; and
 - b. making efficient and effective use of the site to maximise the opportunities for multi-purpose and shared use facilities.
5. Development proposals for new primary and secondary schools which respond to local need will be supported where:
 - a. they are in locations which are accessible to the residents of their indicative catchment areas;
 - b. they can demonstrate appropriate learning spaces (including external play space) can be provided; and
 - c. the design and layout of these facilities and play space provision reflects the relevant guidance from the Department for Education and Sport England, taking account of the level of air quality and other amenity considerations.
6. Development proposals for new early education and care facilities which respond to local need will be supported where:
 - a. they are in locations which are accessible to the local residents or working community, with new housing and/or commercial developments encouraged to provide childcare facilities within the development where there is a need;
 - b. they can demonstrate the design and layout of the facility considers the relevant Ofsted and Department for Education guidance, meeting the needs of young children and promoting their development; and
 - c. they can demonstrate the facility is located within an area of acceptable air quality and incorporates suitable and accessible outdoor space to provide both indoor and outdoor learning opportunities. Where possible, facilities should be located within

proximity to accessible parks, green spaces or outdoor play space, to promote the health and well-being of young children.

7. Development proposals for new adult, further and higher educational facilities will be required to provide information of the relevant certification and registration details from the Department for Education and meet Sport England's design guidance and other relevant national governing bodies' guidance.
8. Development proposals for community uses on meanwhile or vacant sites will be supported, particularly where they bring into use vacant developable land on a temporary basis, when:
 - a. they can demonstrate there is a local need for such use;
 - b. they can demonstrate the site is easily accessible and affordable for the local community;
 - c. they can provide evidence of preventing or mitigating any adverse amenity impacts; and
 - d. they provide a 'move on' plan that makes arrangements for relocation when the site comes forward for development or demonstrate that the need for the use is temporary.

Supporting text

17.22 This policy seeks to ensure that appropriate high quality community facilities are provided in accessible locations throughout the borough, particularly via methods of active travel and public transport, to adequately support the growing population and meet identified needs.

17.23 Part 1 seeks to ensure that expansion of existing and delivery of new community facilities is directed towards accessible locations such as town centres. However, new community facilities outside of town centres will only be supported where sufficient evidence is provided to demonstrate that there is a local need not being met elsewhere in the neighbourhood. Facilities provided in these locations need to ensure that they are local in nature and scale and that there is no adverse impact on the amenity of the surrounding residents. This includes the impact of people coming and going to the facility and the impact of users within the facility when it is in use, as well as the impact on the highway network and parking facilities. Where the provision of a community facility is proposed as part of a residential development, it should be demonstrated that it is accessible to people living outside of the development and designed to be visible from the street.

17.24 Part 2 aims to ensure early consultation and co-design is undertaken with the intended operator and users of a community facility to help inform the design and to ensure community facilities are culturally sensitive and reflect the needs of the diverse communities living in the borough.

17.25 Part 3 aims to ensure that new community facilities remain affordable to the community and those facilities which form part of a wider development are designed to facilitate and encourage wider community use and do not look and feel exclusive to the occupants of

the development. Consideration should be given to ensuring that the facility can be easily accessible to a wide range of users.

17.26 Part 4 encourages new development to consider adaptable and flexible design, considering future-proofing new development and pursuing a more sustainable future for the borough by minimising the need for intensive redevelopment if a change of use were to be required in the future to better accommodate the needs of the community. Development proposals should demonstrate that they have factored in adaptability principles in the design process, examples of which include:

- clear structural spans; allowing for wider, more open and flexible interior spaces;
- non-load-bearing and flexible interior partitions,³⁰ which help spatial programs be adapted over time with minimal need to alter the structure of the building, or during the use of the facility as it caters to different needs; and
- sufficient storage provision, allowing different uses to cohabit the provided space.

17.27 Part 5 encourages the provision of primary and secondary schools in appropriate locations, where they meet local need and demonstrate high quality and inclusive design in line with the relevant guidance from the Department for Education, Sport England, and other relevant national governing bodies.

17.28 In order to ensure that education facilities are suitably located, applicants should outline the indicative catchment area for the recruitment of pupils and assess the impact of people (including pupils, parents, carers and staff) arriving and leaving the facility as well as the impact on the highway network and parking facilities.

17.29 Early education and care facilities (see part 6) refer to places where a number of children under five years of age are brought together during part or all of a working day on a regular basis where they can play, learn and receive care (e.g. primary school nurseries, children's centres, pre-school and 'wrap-around' childcare). Demand for these facilities is expected to rise, with the large increase of new homes in the borough as well as an extension in the free statutory childcare provision now covering children from as young as 9-months and increasing the number of hours of care provided. Therefore future provision will increasingly require innovative approaches to the use of land and floor space, for instance, suitable locations for early years could include the ground floor of residential blocks or secondary frontages in existing town centres as well as including the co-location of early education and care facilities with compatible uses, such as primary and secondary schools and office buildings. However, development proposals are still required to meet the needs of young children and promote their development, meeting the spatial requirements set out in the Department for Education's EYFS statutory framework, and demonstrating they are designed and located with the health of young children in mind, away from areas of poor air quality and incorporating easily accessible outdoor space to provide both indoor and outdoor learning opportunities.

17.30 Further and higher education (see Part 7) refers to the stage of education after secondary school and includes a wide range of institutions including universities and colleges (as defined in the glossary in Appendix 1) which provide lifelong learning. It is noted that some further education colleges do include sixth form provision. In order to meet these requirements, the applicant will need to provide evidence of the relevant certification from the Department for Education as well as details of student and staff numbers, enrolment criteria and curriculum

details. Sport and recreation facilities within schools should also reflect Sport England and other relevant national governing body guidance.

17.31 Part 8 supports the use of vacant and meanwhile sites to be utilised for community uses, when it can be shown that the facility is serving an identified need and can be easily accessed. This is a great way of using under-utilised sites to serve a community need, adding life and vibrancy into spaces that would otherwise be vacant and unoccupied. As part of an application for a meanwhile use, the applicant will need to provide a 'move on' plan, which makes arrangements for the facility once the development of the site commences. This should demonstrate that the facility can be re-provided elsewhere within the local catchment area, where the facility serves a local need, or within the borough or London more widely where the need is not local. Alternatively, a 'move on' plan may not be necessary where the applicant can demonstrate that the need is truly temporary.

London Plan policies:

- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- S3 Education and childcare facilities
- S4 Play and informal recreation
- S5 Sports and recreation facilities
- S17 Reducing waste and supporting the circular economy

Local Plan policies:

- TC1 Supporting the network and hierarchy of centres
- PS3 Securing design quality
- PS5 Gender Inclusive Design
- MC2 Active Travel and healthy streets
- BO1 Green and blue infrastructure

Evidence base:

- Planning for Sport Guidance, 2019
- Active Design, 2015
- Health Building Note 00-01, General design guidance for healthcare, 2014
- Baseline designs for schools: guidance, 2014
- Area Guidelines for Mainstream Schools, Building Bulletin 103, 2014
- Tower Hamlets Infrastructure Delivery Plan, 2023
- Planning and Social Cohesion Evidence Base, 2020
- Tower Hamlets Indoor Sports Facilities Strategy, 2017
- London of Borough of Tower Hamlets School Design Guide, 2021
- Tower Hamlets Leisure Facilities Strategy, 2018
- Tower Hamlets Leisure Needs Assessment, TBC
- Physical Activity and Sport Strategy, 2019
- Tower Hamlets Community Facilities Audit, 2023

Policy CI4 Public houses

1. Development proposals for the loss of a public house will not be supported, unless the following can be demonstrated:
 - a. that all reasonable efforts have been taken to preserve the facility as a public house, including evidence of appropriate maintenance and upkeep and efforts to diversify the business;
 - b. that the public house has been marketed for at least 12 months as a public house at a reasonable market rent and free of tie and restrictive covenant and following this exercise there has been no interest in the property and there is no realistic prospect of continuing its current use; and
 - c. that there has been no interest in the property for an alternative community use over a further 12-month period following the marketing period in Part 1(b).
2. Development proposals that include the replacement or re-provision of a public house will be supported where it can be demonstrated:
 - a. adequate floorspace in an appropriate configuration is provided to ensure the continued viability of the public house including any performance or amenity space that can be used for cultural or community uses, and this should not result in a net loss of floorspace unless fully justifiable; and
 - b. the new facility is provided with a sufficient fit out, protecting the character of the pub, so the operation of the new facility remains viable as agreed with the operator of the facility and secured via a planning obligation.

3. Development proposals within the curtilage of a public house must demonstrate that the continued operation and viability of the public house would not be compromised, and demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity to the public house (e.g. providing sufficient sound insulation) in line with the agent of change principle. Loss of converted pubs on the grounds of viability as a result of previous development will not be supported.

Supporting text

17.32 As set out in the Pubs in Tower Hamlets Evidence Base Study, a public house (pub) can be distinguished from a bar based on the following:

- It genuinely has open access to all members of the community (albeit with possible minimum age restrictions) regardless of background and dress code.
- Typically, they will be places that individuals or groups can visit to engage with others and provide an informal meeting place at different times of day or night.
- Bars on the other hand might have more control over who can enter, sometimes through prohibitive pricing or dress code (actual or perceived), be less conducive to holding community meetings, and be geared more towards the 'town centre' night-time economy.

17.33 There is room for discrepancy between these definitions, but the categorisations put forward give a robust basis for assessment. Pubs play a key role in supporting community interaction, often hosting quizzes and live music, showing live sports, offering space for parties and other gatherings, and having links with external clubs and societies.

17.34 In order to satisfy Part 1(b), applicants will need to submit a full detailed marketing report outlining the asking price or rent for the public house and the terms on which it was offered (e.g. freehold or leasehold; whether or not it included living accommodation and whether any part of the property was excluded). The report should include details of any interest in the property, viewings, and why such interest was not taken forward. This information should also be provided for a subsequent



17.35 Like many other London boroughs, Tower Hamlets had witnessed a significant net loss of public houses (otherwise known as pubs) between 2000 and 2020. However, since the introduction of specific planning policies protecting public houses, the rate of decline has been reversed. This policy therefore aims to maintain the greater protection given to the borough's public houses and guard against their unnecessary loss.

17.36 In order to satisfy Part 1(a), applicants seeking to demolish or replace an existing public house will need to provide evidence of appropriate maintenance and upkeep and efforts to diversify the

business. Details of pub accounts for current and previous trading years should also be provided. 12-month period outlining attempts to let the property for alternative community uses as described under Part 1(c).

17.37 Part 2 seeks to avoid future examples in the borough of what are termed 'trojan horse' pubs. This term refers to developments that have met policy requirements through the re-provision of floorspace for pub use but at a level that is insufficient to be practically let as a pub, resulting in a subsequent application to convert the space to an alternative use. This part of the policy seeks to ensure that there is a genuine intention to continue pub use where redevelopment is proposed. It must also be demonstrated that appropriate soundproofing is to be installed to minimise conflict between the pub and any residential use. In order to satisfy this criterion, applicants should submit indicative floorplans demonstrating that, at a minimum, the proposed floorspace for pub use can support a bar area, appropriate seating, storage, toilets and no loss of any additional community and amenity space that could be used for cultural uses.

17.38 Applicants seeking to reduce or remove outdoor space must demonstrate that the remaining space is of sufficient size and quality for the needs of pub users, and that the pub could continue to operate viably following any loss or reduction.

17.39 Where loss or conversion of ancillary function space or living accommodation is proposed, it must be demonstrated that the pub use would not be undermined through such loss. For the loss of function space, evidence is also required to demonstrate the availability of sufficient and suitable alternative facilities available within the local area.

London Plan policies:

- HC7 Protecting public houses
- D13 Agent of Change

Local Plan policies:

- TC1 Supporting the network and hierarchy of centres
- TC2 Protecting the diversity, vitality and viability of our town centres
- TC5 Food and drink
- TC7 Evening and Night-time Economy
- PS3 Securing design quality
- PS6 Heritage and the historic environment
- CG11 Noise and vibration

Evidence base:

- Pubs in Tower Hamlets – Evidence Study, 2017
- Tower Hamlets Pubs Addendum, 2023

Policy CI5 Arts and culture facilities

1. Development proposals which include the loss of an arts or cultural facility will not be supported unless the following can be demonstrated:
 - a. that all reasonable efforts have been taken to preserve the facility in its current use, including evidence of appropriate maintenance and upkeep;
 - b. that the facility has been marketed for at least 12 months as an arts or culture use at a reasonable market rent and free of restrictive covenant and following this exercise there has been no interest in the property and there is no realistic prospect of continuing its current use;
 - c. that there has been no interest in the property for an alternative community use over a further 12-month period following the marketing period in part 1(b); and
 - d. that where an existing Arts and Culture facility caters to a specific community group, this group will not be negatively affected by the loss of the facility.
2. New arts and cultural facilities will be directed towards Town Centre locations, in accordance with the Town Centre Hierarchy and the Strategic Night Time Economy Designations as set out in policy TC1, the Creative Enterprise Zone in Hackney Wick and Fish Island, the Hackney Wick Specialist Centre, Tower Hamlets Activity Areas and the CAZ as identified in the Local Plan:
 - a. major residential, commercial and mixed-use development proposals in these locations should contribute to enhancing the cultural offer of the area and will be encouraged to incorporate arts and culture facilities in the development;
- b. new arts and culture facilities proposed outside of these locations must demonstrate that they are serving a specific need, have been designed with an end user in mind, that their scale is in keeping with the surroundings and that they will be easily accessed by the local community; and
- c. where use of the facility is only intended to operate during evening/night-time hours, potential for allowing daytime uses to activate the space, including on a meanwhile basis, should be investigated.
3. Where an arts or culture facility is replaced or re-provided, the following requirements apply:
 - a. the new facility must remain accessible, affordable and inclusive to the existing community that use the space, ensuring that the new facility remains affordable to the operator, providing evidence of re-provision at the same rent levels and conducting and providing an Equalities Impact Assessment where required;
 - b. evidence of thorough early engagement with the facility operator so the provision of the new facility is an improvement on the existing, enhancing its function and performance and is provided with a sufficient fit out with the development proposal meeting costs of this, so the operation of the new facility remains viable;
 - c. adequate floorspace and volume in an appropriate configuration must be provided to ensure the continued viability of the

facility including any amenity space that can be used for wider community uses, and this should not result in a net loss of floorspace unless justified by demonstrating that the floorspace lost is surplus to need and the loss has been agreed with the operator;

- d. prioritising the existing use staying open until the re-provided facility is operational, and where this is demonstrated to not be possible a local decant strategy is put in place, with costs of this met by the development proposal; and
- e. where a re-provided arts or culture facility that is likely to produce high noise levels is proposed as part of new development, residents should be informed of the normal operation of the noisy use, this can be in the form of an informative as part of the planning permission.

4. Development proposals in proximity to an arts or cultural facility must demonstrate that the continued operation and viability of the facility would not be compromised, and demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity to the facility in line with the agent of change principle. This would include providing enhanced noise mitigation measures for the existing venue as well as providing sufficient sound insulation for the new development.

5. Development proposals for arts or cultural facilities on meanwhile, pop-up or vacant sites where they bring into use vacant developable land on a temporary basis are encouraged and will be supported where:

- a. they are located within a Town Centre location, the Creative Enterprise Zone in Hackney Wick and Fish Island, Tower Hamlets Activity Areas or the CAZ as identified in the Local Plan; or
- b. on sites outside of these locations, they can prove that they are serving a required need, that their scale is in keeping with the surroundings and that they will be easily accessible to the local community;
- c. the proposal can provide evidence of preventing or mitigating any adverse amenity impacts; and
- d. the temporary proposal does not preclude the permanent use of the site for future development.

Supporting text

17.40 Cultural facilities play a key role in developing the borough's vibrancy and character, delivering social value to communities by facilitating social integration, strengthening identities, providing employment, and offering destinations for residents and visitors alike to take part in cultural activities. They also are vital in supporting the creative economy of the borough and contributing to the rich cultural offer in London as a whole. To ensure this vibrancy is retained and grown, it is important that arts and cultural facilities are offered increased support and protection.

17.41 Arts and cultural facilities can be defined as any development where arts and culture is consumed or participated in. Examples of these facilities include theatres, music venues, rehearsal spaces, cinemas, night clubs, galleries, museums, and historic culture sites.

17.42 The London Plan defines arts and culture facilities as spaces where arts and culture are produced, consumed or participated in. for the purposes of this plan, spaces where arts and culture are produced are addressed in the Inclusive Economy and Good Growth chapter. Where there is overlap, and spaces include both production and consumption or participation, both this policy and the policies in the Inclusive Economy and Good Growth chapter will apply.

17.43 The definition of arts and cultural facilities used in this policy includes both charity/not-for-profit organisations, such as theatres, museums and art galleries and for-profit businesses, such as cinemas, nightclubs, and live music venues. It is important to note that this is not an exhaustive list, and other uses may also be considered as an arts or culture facility. More detail on the types of uses that would be considered arts and culture uses, and detailed definitions, are available as part of the GLA's Cultural Infrastructure Dataset.

17.44 In order to satisfy Part 1(a), applications for development resulting in the loss of an existing arts or cultural facility will need to provide evidence of appropriate maintenance and upkeep and efforts to diversify the business.

17.45 In order to satisfy Part 1(b), applicants will need to submit a full detailed marketing report outlining the asking price or rent for the facility and the terms on which it was offered. The report should include details of any interest in the property, viewings, and why such interest was not taken forward. The report should outline comparative rent prices for other arts and culture uses in the area to justify the asking price. This information should also be provided for a subsequent 12-month period outlining attempts to let the property for any alternative community use as described under Part 1(c).

17.46 Part 2 directs new arts and culture facilities to Town Centre locations (having regard to the Town Centre Hierarchy and the Strategic Night Time Economy Designations set out in Policy TC1), the Creative Enterprise Zone in Hackney Wick and Fish Island, the Hackney Wick Specialist Centre, Tower Hamlets Activity Areas and the CAZ. These locations are accessible to the public, will benefit from the vibrancy and vitality created by the addition of arts and culture uses and can support the evening and night-time uses they bring, contributing to the night-time economy.

17.47 Part 2(a) ensures that any major residential, commercial, and mixed-use development in these locations recognises the importance of arts and culture to the area and contributes to the enhancement of culture in the borough. Development is encouraged to provide arts and cultural facilities as part of the contribution to the community, for example by providing a new cultural venue, new studio space, or facilities and space for outdoor cultural events.

17.48 Where arts and culture facilities are only operating in the evening/night-time, Part 2(c) ensures that there is a substantial investigation into allowing an alternative daytime use to co-habit and activate the space on a shared basis. Evidence of this should be provided and demonstrate that inquiries had been made to other cultural or community organisations with explanation as to why this did not progress further if efforts were unsuccessful.

17.49 Part 3 ensures that when an arts or culture facility is re-provided, the new facility remains accessible, affordable, and inclusive to the existing community that use the space, demonstrated that the re-provided facility is rented at the same levels to ensure the continued affordability of the use. The new facility should be an improvement on the existing and should be provided with a sufficient fit out to remain viable for the existing operator, this will be secured via a planning obligation to ensure the cost of this is met by the developer. Early consultation with the existing operator must be conducted to establish the necessary requirements for this and an agreement with the operator must be provided to demonstrate this.

17.50 In line with the agent of change principle, Part 4 of the policy requires any development within the proximity of an arts or cultural facility to demonstrate that the continued operation and viability of the facility would not be compromised, and demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity to the facility. Examples of this would be to provide evidence of sufficient sound insulation in the new development, and where improvements might need to be made on the existing arts and culture facility these will be the responsibility of the new development.

17.51 Part 5 of the policy supports development proposals for arts or cultural facilities on meanwhile, pop-up or vacant sites where they

bring into use vacant developable land on a temporary basis as long as they are within the specified locations in Part 5(a)(i) or can prove that they are serving a required need, that their scale is in keeping with the surroundings and that they will be easily accessible to the local community (Part 5(a)(ii)). They also must prevent or mitigate any adverse amenity impacts (Part 5(b)) and must not preclude the permanent use of the site for future development (part 5(c)). This policy looks to encourage arts and culture facilities on meanwhile, pop-up or vacant sites, as it is recognised that these facilities bring great social, community and place-shaping benefits.

London Plan policies:

- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy
- D13 Agent of Change

Local Plan policies:

- TC1 Supporting the network and hierarchy of centres
- TC2 Protecting the diversity, vitality and viability of our town centres
- TC5 Food and drink
- TC7 Evening and Night-time Economy
- PS3 Securing design quality
- CG11 Noise and vibration

Evidence base:

- Arts and Culture Topic Paper, 2023
- Mayor of London's Culture Strategy, 2018
- London Culture Infrastructure Plan, 2019

18. Biodiversity and open space

BO1 – Green and blue infrastructure

BO2 – Open spaces and the green grid networks

BO3 – Water spaces

BO4 – Biodiversity and access to nature

BO5 – Urban greening

BO6 – Play and recreation spaces

BO7 – Food growing

Introduction

18.1 Tower Hamlets has over 170 publicly accessible parks and open spaces which are a source of local pride, popular with residents and visitors to the borough. Well-designed and accessible green and blue spaces offer many social, environmental, and economic benefits, including:

- enhancing amenity;
- contributing to healthy lifestyles through providing opportunities for active travel and leisure;
- providing sport and recreation opportunities;

²⁸ Based on figure from Open Space Strategy (2017) and 2023 Census population data for the borough

²⁹ Parks and Open Space Strategy, 2017

³⁰ Parks and Open Space Strategy, 2017



- providing places to meet, play, socialise, and access community
- activities and cultural events;
- providing free and accessible spaces for children and young people, adult carers, and vulnerable and deprived people;
- inclusive and supportive of mental health and well-being
- helping to manage storm water drainage and flood risk;
- mitigating the effects of climate change;
- enhancing biodiversity; and
- providing a cooling effect to reduce elevated urban air temperature.

18.2 The overall provision of publicly accessible open space in Tower Hamlets is 260.58 hectares, which equates to 0.84 hectares per 1,000 residents,²⁸ significantly less than the borough's open space standard of 1.2 hectares per 1,000 residents.²⁹ Some parts of the borough are more acutely deficient in access to open space than others - particularly the Isle of Dogs, Shoreditch, and Whitechapel. Across the borough, there is a substantial shortfall in the provision of playing pitches for outdoor sports, as most grass pitches are located at parks or areas of open space where they often serve multiple functions, such as recreational open space and non-sports related activities.³⁰

18.3 Tower Hamlets is a densely populated borough which faces significant development pressure, and there is limited scope to provide major additional open space to accommodate the needs of the growing population, such as new parkland and woodland. Nevertheless, the borough's open spaces make a significant positive contribution to the character and appearance of the borough, reflecting their popularity

among residents and visitors, relatively good condition, and varied use. Some parks (e.g. Victoria Park) are nationally renowned and have been awarded Green Flag status.

18.4 As the population continues to grow there will be an increasing need to protect and revitalise our existing open spaces as well as secure additional publicly accessible open space and our access to these spaces, especially within deficient areas (see Figure 19). Reflecting the limited opportunities for significant new open space, and to ensure residents can enjoy the benefits of urban greening where new open space cannot be accommodated, the greening of council housing stock, estates, existing public realm, and place, and the overall enhancement of these areas, will be prioritised and encouraged.

18.5 Tower Hamlets has access to more water spaces than any other London borough, comprising the rivers Thames and Lea and the other connecting water spaces (e.g. Limehouse Cut, Regents Canal and Hertford Union Canal) as well as several docks and basins. However, much of the potential of the borough's water spaces remains untapped, due to fragmented public access and limited active recreation and leisure opportunities. Tower Hamlets has also experienced significant historic water loss, particularly around Shadwell Basin and the Ornamental Canal, while a considerable amount of water space has been reclaimed and reused to frame development around West India Docks, Blackwall Basin, and Poplar Dock in Canary Wharf. This has further limited the availability of water spaces for recreation, transport, and Despite its urban character, Tower Hamlets has areas of notable biodiversity value, including three Local Nature Reserves and 38 Sites

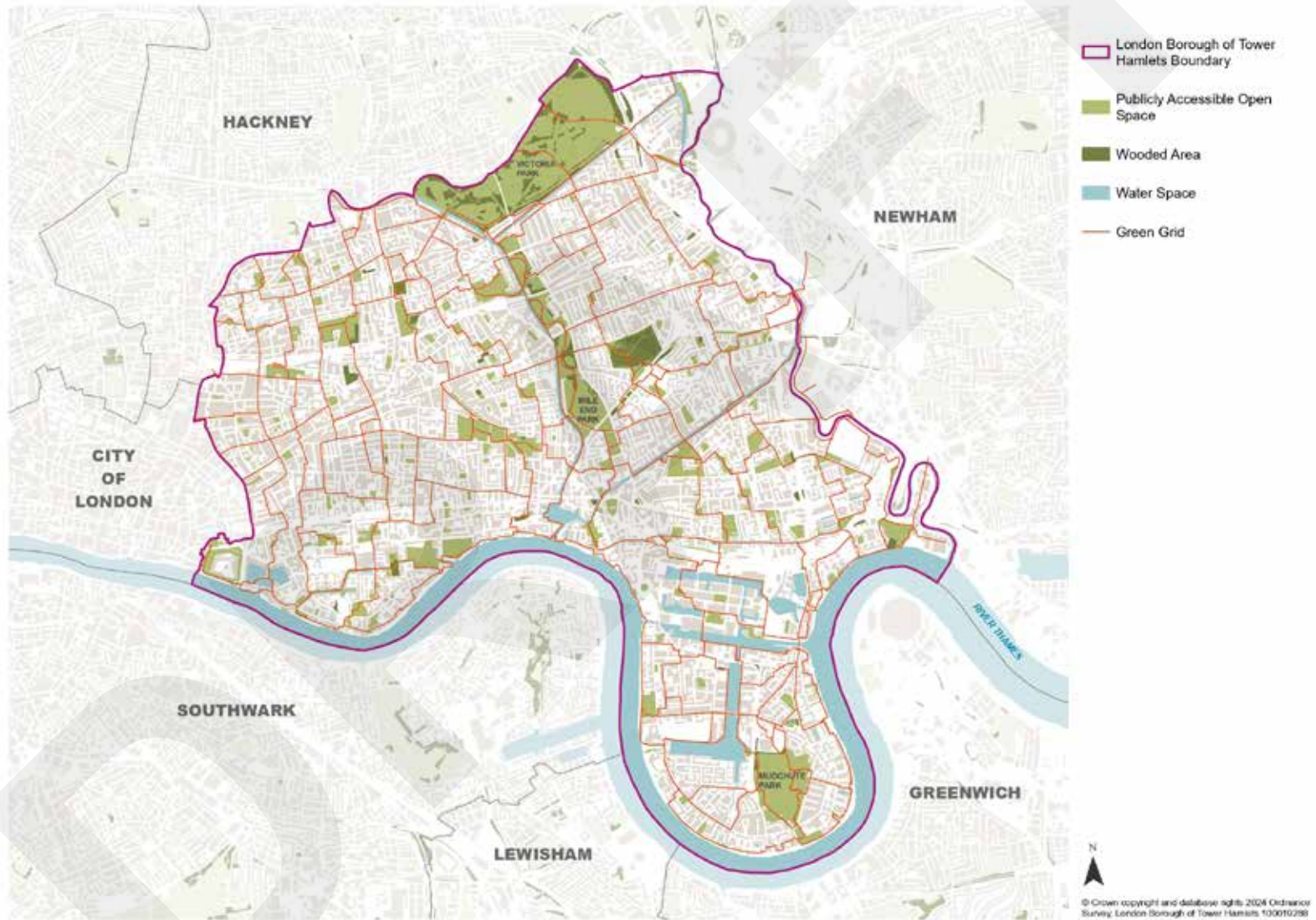
of Importance for Nature Conservation (SINC). However, parts of the borough, including the City Fringe, Poplar, and the western edge of the Isle of Dogs, are considered to be nature deficient³¹.

18.6 This section contains the following policies:

- Policy BO1: Green and blue infrastructure
- Policy BO2: Open spaces and the green grid networks
- Policy BO3: Water spaces
- Policy BO4: Biodiversity and access to nature
- Policy BO5: Urban greening
- Policy BO6: Play and recreation spaces
- Policy BO7: Food growing

³¹ Tower Hamlets Green Grid Strategy (2017)

Figure 18: Network of open and water spaces



Policy BO1 Green and blue infrastructure

Green spaces

1. The council will maintain and enhance the provision of green infrastructure across the borough, delivering an improved network of accessible open spaces through:

- a. protecting all existing open space to ensure that there is no net loss, except where it meets the criteria set out in Policy BO2;
- b. maintaining the open character of Metropolitan Open Land (MOL) in accordance with the London Plan;
requiring strategic development proposals to deliver an increase in new high quality publicly accessible open space on-site, in proportion to the scale of development;
- d. improving the quality, value, functionality, and accessibility of existing publicly accessible open space across the borough and neighbouring boroughs, in line with the Green Grid Strategy, Open Space Strategy, Local Biodiversity Action Plan, Sport England's Active Design Guidance, the Tree Management Plan, and through urban greening initiatives detailed in Policy BO5 – especially on council-owned properties where the introduction of additional open space is difficult to achieve;
- e. delivering an improved network of green grid links in line with the Green Grid Strategy to ensure:
 - i. enhanced access to key destination points (neighbourhood parades and town centres, services, community facilities, and publicly accessible open spaces) and to and along water spaces,

- ii. the physical consolidation of open spaces delivered across adjacent sites,
 - iii. Pleasant, sociable green walk ways that enhance the day to day lives of residents with green walking routes, space to exercise, socialize, walk and play with children, improved local commute, access to the positive mental and physical health effects of time spent in nature.
 - iv. spaces are designed to be safe, inclusive, multi-functional and accessible, and
 - v. ecological corridors for wildlife are provided.
 - f. maximising opportunities to create/increase publicly accessible open space with a focus on creating inter-generational activity, a range of activity (including playing pitches and ancillary sporting facilities) with a range of sizes and for a range of users with attention paid to women and girls. Locations identified with the highest level of open space deficiency will be prioritised; and
 - g. the delivery of enhanced new strategic publicly accessible open spaces at Lea River Park (including the Leaway) and within site allocations.
2. The council will not support inappropriate development proposals on areas designated as MOL (as shown on the Policies Map).

Blue spaces

3. The council will support the management and enhancement of the existing network of high quality, usable, and accessible water spaces network through:
 - a. protecting the integrity of the borough's water spaces;
 - b. maximising opportunities for enhancing the aesthetic, ecological and biodiversity values of the borough's water spaces (including the immediate and surrounding areas) and the water quality, in line with the Tower Hamlets Local Biodiversity Action Plan;
 - c. improving accessibility and wayfinding to and along water spaces to maximise opportunities for public use and enjoyment;
 - d. promoting water spaces for cultural, recreational and leisure activities that are free or low-cost to use, to ensure they are accessible for all residents and visitors, as well as movement, including passenger and freight transport (e.g. along the River Thames);
 - e. working in partnership with the Port of London Authority and the Canal and River Trust to ensure that residential and commercial moorings are in appropriate locations that do not negatively impact on navigation, water quality, the openness and character of the water space and the amenity of surrounding residents;
 - f. supporting the aims of the Water Framework Directive, Thames River Basin Management Plan, Thames Estuary 2100 Plan including its riverside strategy approach, Thames Vision, and any relevant Marine Plans (e.g. South East Marine Plan); and
 - g. rehabilitating and restoring existing waterways that are neglected or in poor health through measures such as rewilding.

Green infrastructure

4. The council will contribute to nature recovery in Tower Hamlets by protecting and enhancing biodiversity by requiring:
5.
 - a. major development proposals to contribute to the greening of Tower Hamlets by including urban greening and nature-based storm water management as a fundamental element of site and building design; and
 - b. all development proposals to achieve minimum urban greening factor (UGF) and biodiversity net gain (BNG) targets as set out in this plan.

Supporting text

18.7 This policy seeks to protect and enhance the borough's valuable network of green and blue spaces and promote the creation of publicly accessible open spaces which are better connected and provide a wide range of opportunities for local communities and visitors in line with the Open Space Strategy, Green Grid Strategy, and other relevant strategies. It also seeks to protect and enhance the borough's water spaces, which enhance the borough's character, provide open space, recreation opportunities, and significant biodiversity benefits.

18.8 The Open Space Strategy sets out where strategic open space (i.e. one hectare or above) will be provided across the borough. This includes the requirements relating to the provision of playing pitches and a detailed action plan on how our open space priorities will be addressed. Further details on the specific needs and priorities for the provision of playing pitches and outdoor sport facilities are outlined in the Infrastructure Delivery Plan. The Green Grid Strategy identifies opportunities to improve connections between existing open spaces and create smaller scale open spaces in areas of need.

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



18.10 Water spaces make a positive contribution to the economy, society, and the environment, and should be safeguarded for water-related purpose with priority given to water management, improving water quality, managing land drainage, and avoiding, reducing, and managing flood risk. This policy seeks to protect and enhance the borough's valuable network of water spaces and ensure that they are easily accessible and provide a wide range of water-related opportunities for local communities and visitors.

18.11 For the purposes of the Local Plan, water space is defined as an area of water (permanently or intermittently covered by water) and includes rivers, canals, docks, basins, ponds, marshland, and other water bodies.

18.12 Figure 18 illustrates the distribution of publicly accessible open spaces across the borough. Detailed boundaries of the borough's publicly accessible open spaces are shown on the Policies Map. Some of the borough's open spaces and water spaces are designated as Metropolitan Open Land (including East India Dock Basin and Brunswick Wharf, Island Gardens, Lee Valley Regional Park, Meath Gardens, Mile End Park, Mudchute Park, Millwall Park, Tower Hamlets Cemetery and Victoria Park) which form part of London's strategically defined open space network.

18.13 Part 1(a) seeks to protect all open spaces regardless of their size, type, ownership and where access is unrestricted, partially restricted, or restricted.

18.14 Part 1(b) seeks to protect the open character of Metropolitan Open Land (MOL). MOL is a unique open space designation in London and is afforded the same level of protection as the Green Belt within the London Plan.

18.15 Part 1 (c) seeks to ensure that strategic development proposals provide proportional contributions to the borough's network of publicly accessible open space. Such developments will have an impact on the capacity of existing open spaces and must therefore ensure that an increase can reduce the pressure on those spaces. The publicly accessible open space should aim to meet the local standard of 1.2 hectares per 1000 residents (as identified in the Open Space Strategy).

18.16 Certain site allocations (as specified within Section 4 of the plan) will be required to provide a minimum of 1 hectare consolidated open space in order to meet wider strategic needs. Part 2 of policy BO2 (Open spaces and the Green Grid network) outlines the quality and standards required for new and enhanced open space provision.

18.17 Part 1(d) promotes the enhancement of the borough's existing open spaces to improve their quality and multi-functionality to serve a variety of users. This will be delivered through the provision of new outdoor sport facilities, such as playing pitches, outdoor gyms and multi-use games areas within existing parks (e.g. Victoria Park, Mudchute Park and Mile End Park).

18.18 Proposals should also incorporate the principles of Sport England's Active Design Guide.

18.19 Part 1(e) promotes the delivery of a well-connected and high-quality network of publicly accessible open spaces through new and improved green grid connections, in accordance with Transport for London's healthy streets initiative. This can be achieved through new planting in the public realm, creating access to nature, natural play and educational elements along the green grid, as well as improved signage to enhance wayfinding. The Green Grid Strategy has identified a series of strategic green grid projects to improve cross-borough connections and help address deficiencies across the borough as well as other parts of London.

18.20 Parts 1(f) and (g) promote the provision of new publicly accessible open spaces to serve the borough's growing population, particularly where they are of a wider strategic importance (e.g. Lea River Park) and in areas of significant open space deficiency (see Figure 19³²).

18.21 The consolidation of open spaces increases their recreational and biodiversity values. Once the total area of new open space provided across development sites reaches 1ha, this can lead to a reduction in deficiency in access to open space. Locating public realm adjacent to water spaces also expands visual amenity, which is important for general well-being. To ensure new developments achieve these outcomes, development proposals must locate new open space in a manner that enables their expansion – either by situating them next to existing open space on adjacent sites, or in a location where further pieces of open space may be delivered on adjacent sites in future.

18.22 The provision of new or improved publicly accessible open space and green grid linkages will be promoted throughout the borough in accordance with the principles set out in the Open Space Strategy, Green Grid Strategy and Mayor of London's All London Green Grid Supplementary Planning Guidance, notably at the following locations:

- d. Queen Elizabeth Olympic Park (i.e. improving links to open spaces and the Lea Navigation and Hertford Union canals);
- e. Lea Valley (including a series of new open spaces as part of the Lea River Park and a new continuous north-south route through Lea Valley connecting the Lea Valley Regional Park to the River Thames as well as new pedestrian footbridges);

- f. Mile End Park and Victoria Park (including green grid extensions to the existing canal walkways and nearby schools);
- g. Whitechapel (including the delivery of the Green Spine – a new north-south pedestrian route linking Whitechapel District Centre with Commercial Road along with a series of open spaces featuring new public squares behind the proposed civic centre and next to St Augustine with St Philip's Church); and Thames Path (i.e. maintaining and expanding the Thames Path to provide continuous public access to the river).
- h. Larger open space (i.e. one hectare and above) provision will be secured on selected allocated sites (as identified in Section 4) through new development.

18.23 Delivery of smaller publicly accessible open spaces such as pocket parks, nature-based storm water management, and linear verges will be promoted through new development to connect to the green grid. These should be designed in line with Inclusive design principles from Policy P5 and the High Density Living SPD & consider long term stewardship and community inclusion

18.24 Innovative approaches to delivering new open space (e.g. rooftop gardens/greenhouses, community gardens) in these areas as well as locating parks in areas of the borough where accessibility to public open space is poor will be promoted. These areas may be but are not limited those with high densities and tall buildings.

18.25 There is a general presumption against inappropriate development on areas designated as MOL (as shown on the Policies Map).

³² Publicly accessible open space deficiency is mapped using 400 metre catchment areas from parks of 1 hectare or above.



Exceptional circumstances for development proposals on MOL must be demonstrated in line with the requirements set out in the NPPF.

18.26 Part 3(a) seeks to ensure that development does not result in further loss or over sailing of the borough's valuable water spaces unless it is a water dependent use at appropriate locations. Water-dependent uses are defined as an activity which can only be conducted on, in, over or adjacent to the water because its function requires direct access to, along and across the water or involves, as an integral part of the activity, the use of the water. Appropriate infrastructure to support water-dependent uses includes:

- a. walkways and slipways for pedestrians, boaters and cyclists;
- b. bridges and tunnels (e.g. across the rivers Lea and Thames);
- c. water-based sport and leisure (e.g. sailing and kayaking);
- d. security and safety (e.g. lifebuoys and other life-saving equipment);
- e. water-based passengers, tourism, transport support and freight infrastructure (e.g. piers and clippers);
- f. marine support facilities;
- g. moorings (including permanent and visitor moorings) and their support infrastructure; and
- h. flood defences and their strengthening and raising in line with the TE2100 Plan.

18.27 In addition, other water-related uses may also be considered at suitable locations where there is clear evidence that they are specifically designed to enhance the public access, use or enjoyment of the water space and will have a positive contribution to the character of the water space without causing any adverse negative impacts on biodiversity or flood risk (e.g. activate the water space to enhance it as a waterside destination). An important consideration in decision making will be the cumulative impact of existing and proposed new water related uses to ensure that that there is no adverse impact on the character and openness of the borough's water space and the amenity of surrounding residents.

18.28 Despite their urban setting and heavily modified nature, the borough's network of rivers, canals and docks are important for



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biodiversity, supporting a wide range of species of wild plants and animals (including rare and protected species) and allowing people to come into contact with nature. In accordance with part 3(b), development will be expected to preserve and enhance biodiversity and increase the resilience of wetland ecosystems. This can be achieved through a range of measures, including the restoration and creation of priority habitats, planting native species along the waterways to create more natural landscapes, and preventing overspill of artificial lighting and excessive shade onto water bodies and adjacent areas of soft landscaping to protect the ecosystems' natural patterns of activity.

18.29 Some of the borough's water spaces are difficult to find and access from nearby transport hubs (e.g. River Lea, Shadwell Basin and West India Middle and South Docks) or have restricted and disjointed access (e.g. River Thames). Part 3(c) of the policy seeks to ensure that access to all water spaces is improved through appropriate signage for better way finding. Many of the borough's water spaces (including Blackwall Basin, Hermitage Basin, Limehouse Basin, East India Dock Basin, Limehouse Cut Canal, Millwall inner and outer docks, Poplar Dock, St Katherine's Dock, Wapping Canal, West India Docks and the rivers Lea and Thames) are located within or adjacent to areas of open space deficiency. These water spaces and the adjacent land therefore provide important open space functions and make a valuable contribution to the health and well-being of communities.

18.30 In delivering Part 3(d), additional opportunities will be explored to maximise the use of the borough's water spaces for transport and freight at suitable locations (e.g. Trinity Buoy Wharf and along the River Thames), including the introduction of additional Thames Clipper stops. Policies MC1 and MC4 provide further guidance on sustainable transport and freight.

18.31 Creating and enhancing the borough's high quality, usable and accessible network of water spaces will be delivered through a coordinated approach with a wide range of stakeholders, including the Canal & River Trust, Port of London Authority, Inland Waterways Association, the Environment Agency, neighbouring boroughs, and other relevant organisations, see parts 3(e) and (f).

18.32 This policy also recognises the importance of several strategic documents which provide the framework for the sustainable development of the borough's water spaces and, more specifically, the river Thames and its tributaries (see Part 1(f)).

- a. The Water Framework Directive provides a framework for protecting and improving the ecological quality of all water bodies.
- b. Following on from the Water Framework Directive, the Thames River Basin Management Plan sets out actions to protect and enhance the river's natural environment.
- c. The Thames Strategy East sets out a long-term framework to guide the sustainable management of the Thames Policy Area (as shown on the Policies Map) and promotes development principles, such as greater connectivity through improved foot and cycle access to and along the river Thames and the provision of water support infrastructure (e.g. bridges, piers, and flood defences, etc) which respects and contribute to the river's character.
- d. The Thames Estuary 2100 Plan sets out a comprehensive action plan to manage tidal flood risk across the River Thames and the River Lea including the raising of defences by the riparian owners, which will require adaptation of the adjacent public realm.
- e. The Thames Vision sets out the goals and priority actions to help manage and promote the river Thames, which include: more trade

and more jobs associated with the river; improved use of the river for the transportation of passengers and freight; and an improved environment and river heritage.

- f. Tower Hamlets falls within the remit of the Marine Plan for the South East inshore area. Adopted in 2021, the Marine Plan for the South East seeks to enhance and protect the marine environment and achieve sustainable economic growth and marine development and applies when development proposals include a section of coastline or tidal river. The detailed boundaries of the Marine Plan for the South East inshore area (within the borough) are shown on the Policies Map. Any development and activities within the rivers Thames and Lea should policies set out in the South East Marine Plan.

18.33 Tower Hamlets has a diverse range of sites of biodiversity value, including areas of open space, waterways, and formally designated Sites of Importance for Nature Conservation (SINCs). Part 4 recognises that development can contribute to enhancing the borough's biodiversity through urban greening measures. The London Plan establishes the Urban Greening Factor model to determine the appropriate provision of urban greening for new developments.

London Plan policies:

- G1 Green infrastructure
- G2 London's Green Belt
- G3 Metropolitan Open Land
- G4 Open Space
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- G8 Food growing
- S14 Waterways – strategic role
- S16 Waterways – use and enjoyment
- P7 Protecting and enhancing London's waterways

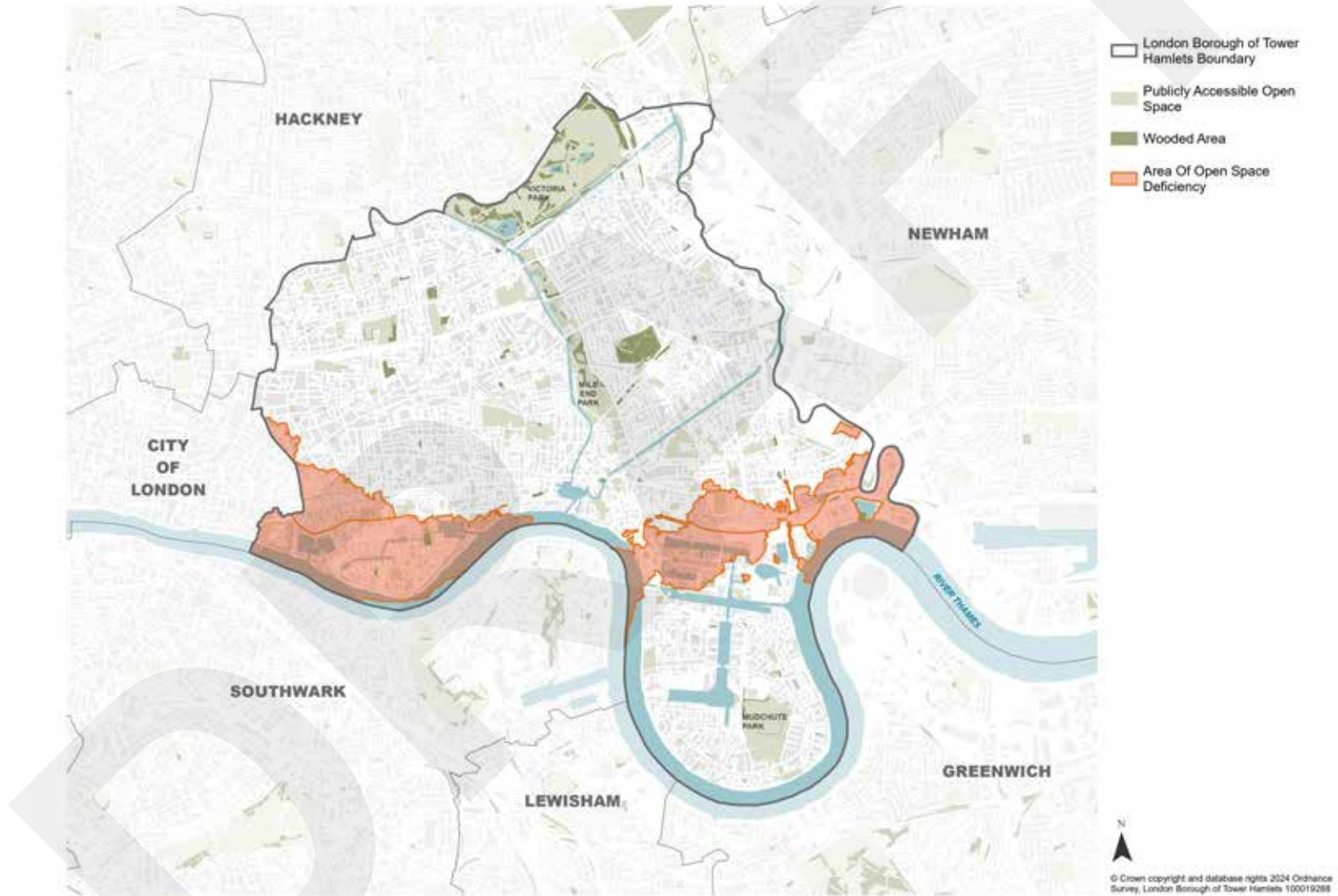
Local Plan policies:

- DV2 Delivering sustainable growth in Tower Hamlets
- DV3 Health impact assessments
- DV5 Developer contributions
- PS1 Design-and Infrastructure-led approach to development
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- HC10 Housing standards and quality
- Cl1 Supporting community facilities
- CG1 Mitigating and adapting to a changing climate
- CG7 Managing flood risk
- CG8 Sustainable drainage
- CG9 Water efficient design
- MC1 Sustainable travel
- MC2 Active travel and healthy streets

Evidence base:

- Tower Hamlets Open Space Strategy, 2017
- Tower Hamlets Water Space Study, 2017
- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- Tower Hamlets Local Biodiversity Action Plan, 2019
- All London Green Grid Supplementary Planning Guidance, 2012
- Active Design Guidance, 2023
- Tower Hamlets Playing Pitch Assessment, 2017
- High Density Living Supplementary Planning Guidance, 2020

Figure 19: Areas of open space deficiency



Policy BO2 Open spaces and the Green Grid network

1. Development proposals on areas of open space (excluding MOL) will only be supported in exceptional circumstances where they:
 - a. provide essential facilities that enhance the function, use and enjoyment of the open space (e.g. ancillary sport facilities to the playing field use); or
 - b. demonstrate they achieve a higher quality of open space, by meeting specific criteria which sets out appropriate and acceptable improvements;
it is an outdoor sport and recreational space or facility, the sporting and recreational benefits of which would outweigh the harm resulting from its loss; and
 - c. in any of the circumstances described in parts 1(a), (b), and (c), it is demonstrated that it will not result in any adverse impacts on the existing ecological, heritage or recreational value of the open space and the flood risk levels within and beyond the boundaries of the site.
2. Major development proposals should contribute to the delivery of new or enhanced publicly accessible open space on-site which should:
 - a. be visible and accessible from the public realm surrounding the site;
 - b. be of a high quality and inclusive design that complements local character
 - c. provide facilities to promote active recreation

- d. and healthy lifestyles, including facilities like sport pitches, playgrounds, and outdoor gyms;
- e. be well-connected and way-marked to other open spaces, in accordance with the Green Grid Strategy and Open Space Strategy;
- f. be consolidated and facilitate potential future extensions of open space on adjacent sites;
- g. remove existing barriers such as gates to and fences around green spaces and remove steps or other impediments to accessibility;
- h. contribute towards meeting the demand that they generate through the provision of on-site sport facilities and/or providing additional capacity off-site;
- i. incorporate soft landscaping, shading, and sustainable drainage systems consistent with Policy CG8;
- j. enhance biodiversity, contributing to the objectives identified in Policy BO4 and the Local Biodiversity Action Plan;
- k. be designed to be enjoyed by people of all ages, gender identities, and physical abilities, with adequate facilities and amenities such as toilets, water fountains, seating and picnic areas, lighting and wayfinding signage, accessible footpaths, nature or running trails;
- l. integrate play and space for informal recreation as per requirements set out in Policy BO6; and
- m. integrate food growing opportunities, where feasible and practical as per Policy BO7.

3. Development proposals should not solely rely upon existing publicly accessible open space to contribute towards on-site communal amenity space and child play space.
4. Development proposals should not adversely impact the enjoyment, openness, ecological and heritage value of the borough's publicly accessible open spaces.
5. Major development proposals adjacent to the existing and proposed Green Grid network must contribute to the expansion and the enhancement of Green Grid links to connect communities to publicly accessible open spaces and water spaces as well as other main destination points, such as town centres, schools, health facilities and transport hubs.
6. Development proposals adjacent to the existing and proposed Green Grid network must demonstrate that they will not have adverse impacts on the access, design, usability, biodiversity, and recreational value of the green grid network.
7. Development proposals that provide community allotments, gardens, greening, and pocket parks will be encouraged, particularly where they bring into use vacant developable land on a temporary basis or as part of a meanwhile use.

Supporting text

18.34 This policy aims to ensure that development proposals do not negatively impact the existing network of publicly accessible open space and contributes to its expansion and enhancement. It also seeks to maximise the opportunities for delivery of new open space and for enhancing accessibility and connectivity to the wider network, which is considered crucial to addressing the borough's open space deficiency (as shown on Figure 19).

18.35 Development proposals on areas of open space will be resisted unless in the circumstances specified in part 1. The types of development that are considered to be acceptable in principle within areas of open space include changing rooms, play equipment and seating. They should be of a scale and function proportionate to the open space in which they are to be located and should be purely ancillary to it.

18.36 In relation to part 1(b), the starting point for all development proposals will be no net loss of open space, and any development proposal resulting in an increase in population will be required to provide an amount of open space in accordance with the principles set out

18.37 in Policy BO1. However, there may be certain circumstances (e.g. in housing estate regeneration schemes) where building on fragmented, unused, and poor quality open space enables the provision of a larger, consolidated, and enhanced area of open space which is more usable for the local community and provides better urban greening and biodiversity outcomes than the existing open space.

18.38 For a net loss of open space to be considered, the development proposal must demonstrate it will achieve the above by successfully consolidating smaller and less functional areas into a larger open space

and delivering as many of the following enhancements as possible, including:

- a. improving the openness and passive surveillance of a green space;
- b. removing barriers such as fences or steps to make green spaces more welcoming, usable, and accessible, with better connections through or across sites;
- c. introducing furniture or features such as benches, seating and tables, drinking fountains, planter boxes for food growing, waste bins, lighting, and signage;
- d. the installation of new or replacement of dilapidated play equipment, public toilets, fitness equipment, public art, or other such facilities;
- e. installing bird and bat nesting boxes, planting appropriate species, and other interventions that provide maximum benefit for biodiversity, and exceeding minimum requirements detailed under Policy BO4; and
- f. installing nature-based SuDS to manage rainfall and reduce surface water run-off.

18.39 Part 1(c) allows for provision of outdoor sport and recreation facilities on open space in circumstances where the public benefit from the facility outweighs the harm from the loss of openness. This recognises the value of recreational facilities to residents of the borough and their importance to health and well-being and acknowledges that there are likely to be few sites in the borough that would be suitable for outdoor sports and recreation facilities that are not designated open spaces.

18.40 Part 1(d) seeks to ensure that where they are determined to be acceptable on other grounds, development proposals on open space do not compromise other significant features of the site or increase the level of flood risk as a result of developing open space.

18.41 Part 2 seeks to promote delivery of new publicly accessible open space and, in particular, the provision of new publicly accessible open space on major schemes (between 10-100 residential units or between 1,000-10,000 square metres floor space) and strategic schemes (more than 100 homes or over 10,000 square metres floor space), or where development is considered to place significant additional demand on existing publicly accessible open space, particularly in identified areas of open space deficiency (see Figure 19).

18.42 Where publicly accessible open space is provided on site, it should aim to meet the local standard of 1.2 hectares per 1000 residents (as identified in the Open Space Strategy). New publicly accessible open space will be expected to meet the design criteria in part 1. Notwithstanding, given the extent of residential development required and forecast for the borough, development proposals that maintain the existing 0.84ha per 1,000 residents standard will be considered. Reflecting the limited opportunities for significant new open space, and to ensure residents can enjoy the benefits of urban greening where new open space cannot be accommodated, the greening of council housing stock, estates, existing public realm, and place, and the overall enhancement of these areas, will be prioritised and encouraged.

18.43 Future management and maintenance of new publicly accessible open space will be secured through planning conditions or legal agreements to ensure the highest possible level of public access, function, and use.

18.44 The provision of amenity space or landscaping required as part of good design to mitigate the impact of development will not be counted towards the provision of appropriate publicly accessible open space. The level and nature of any sports provision should take account of the recommendations set out in Sport England's guidance and our Open Space Strategy and its associated action plan.

18.45 Where on-site provision of adequate publicly accessible open space is not possible, a contribution will be sought from the developer towards the delivery of the opportunities and the strategic projects identified in the Open Space Strategy and Green Grid Strategy in accordance with the Planning Obligations SPD.

18.46 Part 3 seeks to ensure that residential developments will not place undue pressure on publicly accessible open space and will not be allowed to solely rely upon nearby public open space to contribute to adequate outdoor communal amenity space, including child play space in line with the principles set out in Policy BO6.

18.47 In accordance with part 4, development will be expected to demonstrate that it will enhance and not negatively affect the borough's publicly accessible open space, including the Lee Valley Regional Park (consisting of East India Dock Basin and linear towpaths along the River Lea Navigation, Hertford Union Canal and Limehouse Cut) the Lea River Park (including the Leaway) and TfL's Lea Valley Walk initiative.

18.48 The Lee Valley Regional Park forms an important part of the borough's green grid and water spaces network and has the potential to contribute to creating healthy and liveable communities, particularly where links into this network can be enhanced and complemented with new open space delivered as part of development. The Lee Valley Regional Park Authority is a statutory authority, with responsibilities to either provide directly or work with partners to provide facilities

for sport, recreation, leisure, entertainment, and nature conservation throughout the park. As such, the council will work together with the Lee Valley Regional Park Authority and the Environment Agency to support proposals set out in the Tower Hamlets' Local Biodiversity Action Plan and the Park Development Framework where they relate to the borough. We will also work with neighbouring authorities and relevant stakeholders to support the delivery of the Lea River Park (including the Leaway), which connects Queen Elizabeth Olympic Park and the Lee Valley Regional Park to the Royal Docks and the River Thames through a new continuous walking and cycling route along the River Lea. Further development principles and guidance are included in the Lea River Park Primer and Lea River Park Design Manual.

18.49 Parts 5 and 6 require development proposals located adjacent to the green grid (i.e. within the Green Grid Buffer Zone, (as shown on the Policies Map) – including the Lee Valley Regional Park, Lea River Park, Thames Path National Trail and canal towpaths – to contribute to linking and improving the connectivity of green grid links in accordance with the Green Grid Strategy and the Mayor of London's All London Green Grid Supplementary Planning Guidance. This should be supported with adequate signage and facilities for visitors and tourists. Public realm improvements will be considered on a case-by-case basis and may include:

- a. new or enhanced/widened footpaths or cycleways;
- b. road realignment;
- c. street crossings or other safety measures;
- d. cycle parking including space for cycle hire;
- e. external lighting;

- f. landscaping;
- g. tree planting or other urban greening measures;
- h. drinking water fountains;
- i. public conveniences;
- j. electrical connection points for concessions; and
- k. way-finding signage.

18.50 Opportunities should be sought to improve the quality of TfL signed cycle routes, in line with the London Cycle Design Standards (2017) and TfL's New Cycle Route Quality Criteria (2019) and Policy MC2. Part 7 encourages the creation of community allotments, gardens and pocket parks which promote healthier lifestyles and greater social interactions.

London Plan policies:

- G1 Green infrastructure
- G2 London's Green Belt
- G3 Metropolitan Open Land
- G4 Open Space

Local Plan policies:

- DV2 Delivering sustainable growth in Tower Hamlets
- DV3 Health impact assessments
- DV5 Developer contributions
- PS1 Design-and Infrastructure-led approach to development
- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- HC1 Meeting housing needs
- HC10 Housing standards and quality
- Cl1 Supporting community facilities
- CG1 Mitigating and adapting to a changing climate
- MC1 Sustainable travel
- MC2 Active travel and healthy streets
- MC5 Sustainable delivery, servicing, and construction

Evidence base:

- Tower Hamlets Open Space Strategy, 2017
- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- All London Green Grid Supplementary Planning Guidance, 2012
- Active Design Guidance, 2023
- Tower Hamlets Playing Pitch Assessment, 2017

Policy BO3 Water spaces

1. Development proposals in, adjacent to, or affecting the borough's water spaces must:

- a. not result in loss or covering of the water space or harm the openness of the water space, unless it is a water-related or water-dependent use at appropriate locations and of appropriate scale;
- b. not result in adverse impacts on the existing water spaces network, including navigation, biodiversity, water quality, visual amenity, character and heritage value of the water space, taking into consideration the adjacent land and the amenity of existing surrounding developments;
- c. not adversely impact other existing active water uses;
- d. enhance the ecological, biodiversity and aesthetic quality of the water space, responding appropriately to the setting of the adjacent land area, in line with the Tower Hamlets Local Biodiversity Action Plan, the Water Framework Directive and the Thames Tidal Masterplan: Tower Hamlets and Newham;
- e. activate riverbanks and dock edges, and provide improved amenity space, increased opportunities for public access, and use of the water space for water-related uses and sport and recreational activities (where appropriate, and where proposals do not adversely impact the biodiversity, ecology, or health of the water space) in line with the TE2100 riverside strategy approach;
- f. improve the safety and accessibility of the borough's water spaces, consistent with requirements set out in the Port of London Authority's guidance 'A Safer Riverside'(where appropriate to the waterspace). This should include provision of riparian lifesaving equipment where necessary (such as grab chains, access ladders, and lifebuoys) where appropriate, improved lighting and wayfinding, and managing competing spaces between users;
- g. respond positively and sensitively to the setting of water space, while respecting and animating water space to improve usability and safety;
- h. provide suitable setbacks from water space edges to allow maintenance of defences, which mitigate flood risk, emergency access, future upgrades to flood defences and river banks and to allow riverside walkways, canal towpaths and cycle paths for equal access, where appropriate; and
- i. where relevant, contribute to the restoration of river channels and water spaces through rewilding and re-naturalisation.
- j. not involve the culverting of a watercourse, development proposals should actively seek to de-culvert and provide better provision of daylight exposure to a waterbody wherever possible, developers should consider opportunities for removal of toe-boarded watercourses. Development proposals within the Thames Policy Area (as shown on the Policies Map) are required to consider the guidance provided within the most up-to-date Thames River Basin Management Plan and the relevant Southeast Marine Plan, where applicable.

2. Development proposals adjacent to and along the borough's water spaces are required to integrate with and enhance the waterside environment, including improving the area's links with the water space, contribute to the delivery of continuous walkways, canal towpaths and cycle paths where appropriate (e.g. completion of the Thames Path), and consider flood defence raising and the management of historic wharves in line with TE2100 riverside strategy approach.
3. Development proposals for eco-moorings will be considered acceptable at suitable locations, and where they do not cause any adverse impact on navigation, biodiversity, microclimate, safety, amenity of surrounding residents and the public enjoyment of the water space.

Supporting text

18.51 This policy provides details of how the borough's water spaces will be protected and how the various functions they offer are maintained and enhanced.

18.52 Part 1 requires development to demonstrate that it will not result in loss or covering of water space and that it will not compromise the suitability of the water space for water-related uses (as defined in Policy BO2). Further water loss and over-sailing from development will be resisted throughout the borough, particularly at locations that have experienced significant water space loss, such as West India South Dock, West India Middle Dock, West India North Dock, Blackwall Basin, and Poplar Dock in Canary Wharf.

18.53 In line with London Plan policies and guidance, provision of appropriate water space support infrastructure (including but not limited to: transport and essential access infrastructure into and alongside water spaces, boatyards, eco-moorings, jetties and safety equipment) will be supported at suitable locations. Further details on infrastructure for water-related and water-dependent uses are included in Policy BO2. The Infrastructure Delivery Plan provides information on the current need for some water support infrastructure (e.g. bridges).

18.54 The sense of openness greatly contributes to a person's perception and enjoyment of water spaces. This is of particular importance in a borough like Tower Hamlets where there is a high deficiency of open space. When assessing planning applications, consideration will be given to the water coverage and human experience of the open character of water space in terms of its visibility and visual connections across the water from the surrounding public realm (see part 1(a)).



18.55 Tower Hamlets benefits from its location on the rivers Thames and Lea, and its many basins and canals. The health, navigability, character, and heritage of the borough's water spaces are ongoing function, including their use for social, leisure, economic, and cultural purposes. Development proposals should seek to protect and enhance water networks within the borough, their settings, and the amenity of adjacent developments, and not compromise existing water-based operations or uses (see parts (b and c)).

18.56 The ecology and biodiversity of the borough's water networks as well as their appearance and surroundings are crucial to their ongoing health and public enjoyment of these areas.

18.57 Biodiversity Action sets out measures to enhance rivers and waterways, including controlling invasive species, providing vegetation on river walls or on floating rafts, encouraging schemes to improve water quality, and increasing habitat. The Water Framework Directive focuses on ensuring good qualitative and quantitative health of water bodies, including reducing and removing pollution, and ensuring there is enough water to support wildlife at the same time as human needs (see part 1(d)).

18.58 Where a Water Framework Directive assessment is required to undertake works on or adjacent to a watercourse, the developer is required to contact the Environment Agency and provide information to demonstrate that the Water Framework Directive objectives can be met or to otherwise justify the development.

18.59 Public access to and along the borough's water spaces will be improved, particularly where access is currently restricted, including the docks around Canary Wharf (including West India Middle Dock and Blackwall Basin), the river Lea and the river Thames (e.g. the Thames Path) (see Part 1(e)).

18.60 Safety and public use of the borough's water spaces will be improved through development design which provides good pedestrian access, active frontages to improve surveillance and riparian lifesaving equipment, where appropriate. Increased appeal through active frontages will be particularly important for the docks in Canary Wharf as well as areas around Trinity Buoy Wharf, Limehouse Basin and along the river Lea which can have significant potential to attract visitors (see part 1(f)).

18.61 The edges of water space are an extremely important part of the functioning of water space as ecosystems, open space, and transport networks. Development proposals must ensure that such areas are protected and provide setbacks from the edges of the water space as well as contribute to restoration following the Environment Agency's Estuary Edges guidance. How this restoration should be undertaken will need to be considered against the functions of the water space and an appropriate balance will be sought between uses on the water space and access to and interaction with the water space and ecological enhancements in line with the Tower Hamlets Local Biodiversity Action Plan. Setbacks from waterways are also required for flood management purposes and further details outlining their use are provided in Policy CG2. Where setbacks are required they provide an opportunity to increase enjoyment of the waterways and should be designed to look and feel publicly accessible (e.g. through the use of signposting) (see paragraph 18.60h)).

18.62 The river Thames provides important additional opportunities to that of other water spaces within the borough, acting as a transport link of strategic and historical importance. Developments in the Thames Policy Area (as identified on the Policies Map) should ensure that their use and design establishes a positive relationship with the river in accordance with the most up-to-date guidance within the

18.63 Thames Policy Area (e.g. Thames Strategy East and Thames River Basin Management Plan) and supplementary planning documents (see Part 2).

18.64 Part 3 promotes the improved public access to and along the borough's water spaces, particularly where it is currently restricted, partially restricted or fragmented (e.g. along the River Thames, the River Lea and the docks around Canary Wharf, including West India

Middle Dock and Blackwall Basin). The Thames Path forms part of the National Trail. We are committed to maintaining the existing National Trail and expanding the Thames Path along the eastern part of the Isle of Dogs to connect it to the Leaway as a publicly accessible continuous route. Developments adjacent to the river Thames should contribute towards the delivery and maintenance of this route. This will be secured by planning obligation. Where the Thames Path cannot be delivered adjacent to the river Thames, due to heritage reasons, we will require the development to contribute towards the signposting, design and maintenance of an alternative route.

18.65 Wharves and terminals with limited accessibility also pose a challenge to finding appropriate routes. It is encouraged that developers consider pragmatic solutions which would allow for safer access around these sites.

18.66 The TE2100 Plan sets out the raising of flood defences by up to 500mm by 2050 and a further 500mm by 2090. Having monitored sea level rise, the Environment Agency has moved the earlier deadline forward by 15 years to accommodate the higher level of rise that has occurred, when compared with what was modelled when the Plan was first produced. Further changes are anticipated as the effects of climate change manifest themselves. It is clear though, that the raising of defences will have significant implications for riparian owners and the environment and development adjacent to rivers. A Riverside Strategy will be developed before 2034 and detail approaches to defence raising, including the defences provided to historic wharfs.

18.67 However, riparian owners are advised that any works on riparian sites and to river defences in advance of the Strategy, need to include clear plans for raising and strengthening defences and ensuring that these do not reduce the amenity value of the riverside environment.

18.68 The council will work together with the Port of London Authority and Canal and River Trust to determine the suitability of moorings (including residential and commercial moorings) on the borough's water spaces. Key considerations in assessing the impact of mooring proposals will include: navigation, water quality, biodiversity, openness and character of the water space and surrounding area, surrounding residential amenity, waste management and air quality as well as the adequate supply of electricity provision. All sites adjacent to waterways should investigate the opportunity to provide residential moorings and should engage with the Canal and River Trust early in the planning process'. The Tower Hamlets Water Space Study identifies some of the locations which may be considered suitable for further development of residential moorings. Development proposals for permanent eco-moorings will be considered acceptable at suitable locations, including Regents Canal, Blackwall Basin, Poplar Dock, Millwall Inner and Outer Docks and the West India South Dock and where they do not cause any adverse impact on navigation.

London Plan policies:

- S14 Waterways – strategic role
- S16 Waterways – use and enjoyment
- S17 Protecting and enhancing London's waterways

Local Plan policies:

- DV5 Developer contributions
- PS1 Design-and Infrastructure-led approach to development
- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- CG1 Mitigating and adapting to a changing climate
- CG7 Mitigating flood risk
- CG8 Sustainable drainage
- CG9 Water efficient design
- MC1 Sustainable travel
- MC2 Active travel and healthy streets
- MC5 Sustainable delivery, servicing, and construction

Evidence base:

- Tower Hamlets Water Space Study, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- Tower Hamlets Local Biodiversity Action Plan, 2019
- Thames Estuary 2100 (TE2100) Plan, 2023

Policy BO4 Biodiversity and access to nature

1. Development proposals must protect and enhance biodiversity and contribute to nature recovery in the borough through:
 - a. protecting and retaining existing habitats and features of biodiversity value. If this is not possible, these features must be replaced within the development, and additional measures must be incorporated to enhance biodiversity, proportionate to the development proposed;
 - b. maximising the provision of 'living building' elements to provide opportunities to create new onsite habitats, including integral nest boxes; anddemonstrating that the development does not have an adverse impact on open spaces, including watercourses and water bodies and their hydrology.
2. Development proposals for all major development, and minor developments which are not exempt from mandatory Biodiversity Net Gain under national guidelines, must deliver Biodiversity Net Gain (BNG).
 - a. The BNG benchmark is a minimum 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) in habitat value for wildlife compared with the pre-development baseline, calculated using an appropriate Biodiversity Metric and secured in perpetuity (at least 30 years);
 - b. Minor development that is exempt from mandatory BNG will be

expected to deliver biodiversity enhancement in line with the Local Biodiversity Action Plan, appropriate to the scale of the development.

- c. Where BNG requirements for a 10% minimum gain cannot be met on site, unless the development is exempt from mandatory BNG under national guidance, they will need to be offset via the purchase of offsite biodiversity units, secured through section 106 planning obligation or planning condition.
3. Major development is required to submit an ecology assessment demonstrating biodiversity enhancements that contribute to the objectives of the latest Tower Hamlets Local Biodiversity Action Plan and the Thames River Basin Management Plan.
4. Development proposals must not negatively impact on any designated European site such as Special Protection Areas, Special Areas of Conservation or Ramsar sites. Developments which might have the potential to adversely impact a Special Protection Area or Special Area of Conservation outside the borough will be required to submit a Habitat Regulations Assessment.
5. Development proposals must avoid harm to biodiversity. In line with London Plan Policy G3 (Biodiversity and access to nature), where it is demonstrated that harm to a Site of Importance for Nature Conservation (SINC) or the population or conservation status of a protected or priority species is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy must be applied to minimise impacts:

- a. avoid damaging the significant ecological features of the site;
 - b. Where avoidance is not possible, proposals must minimise and mitigate the impact to the biodiversity interest by improving the quality or management of the rest of the site; and
 - c. as a last resort for exceptional cases, deliver off-site compensation of better biodiversity value.
6. Planting and landscaping around developments must not include 'potentially invasive non-native species' or plants known to produce nectar that is toxic to bees. Invasive non-native species listed in Schedule 9 of the Wildlife and Countryside Act must be controlled, and eradicated where possible, as part of redevelopment.



Supporting text

18.6g While Tower Hamlets is a densely built-up urban area, it nevertheless is home to a diverse range of flora, fauna, and different habitats of biodiversity value, including areas of open space, waterways and formally designated Sites of Importance for Nature Conservation (SINCs). There are two Local Nature Reserves in the borough at Mudchute and Tower Hamlets Cemetery Park.

18.70 Living building elements can enhance biodiversity, both directly through planting and indirectly through providing habitats. They also have flood reduction, climatic and air quality benefits, helping to remove carbon dioxide from the air and reduce temperatures.

18.71 In implementing Part 1(a), consideration will be given to the size, scale and nature of the development, and whether an appropriate level of provision is proposed. Even minor development, such as rear extensions, have the ability to provide biodiversity measures through features such as living roofs, walls, habitat structure (e.g. bat and bird boxes).

18.72 In implementing Part 1(b), 'living building' elements need to contribute to local biodiversity through providing priority habitats, and/or features for priority species, as identified in the latest Tower Hamlets Local Biodiversity Action Plan. The types of 'living building' techniques we consider appropriate include living roofs, walls, terraces, and other building greening techniques.

18.73 Swift bricks or nest boxes that meet the requirements of the British Standard BS 42021:2022 for nest boxes should also be provided in all new developments for swifts and other small birds at 5m or greater in height to the eaves. Built-in swift bricks are preferred to external boxes



as they are integrated into the building, cannot be removed, provide better temperature control and require less maintenance. Unless circumstances make the swift brick or similar product impractical, this system should be chosen over external nest boxes. For minor developments, the minimum number of swift boxes required on residential development is three, or two per residential unit, whichever is greater (noting it is not necessary that two boxes are placed on each unit, but that the equivalent number should be applied across the development). For major developments specific requirements will be recommended by the ecology advisor. The requirement will be secured by attaching a condition to planning consents.

18.74 'Living building' elements should also be considered alongside the sustainable urban drainage system requirements outlined in Policy CG8, and green grid requirements outlined in Policies BO1 and BO2. Providing living building elements is considered particularly beneficial in areas of sub-standard air quality or in areas at particular risk of experiencing the urban heat island effect, or the phenomenon of urban areas generating their own microclimates resulting in significantly higher temperatures than surrounding rural areas. The risk of experiencing the urban heat-island effect should be considered over the lifetime of the development. Details of ongoing maintenance of the 'living building' elements will also be required.

18.75 Areas at particular risk of experiencing the urban heat island effect include areas of deficiency of access to nature, areas of high density development with clusters of tall buildings, (including developments within identified Tall Building Zones (see Policy PS2)), and areas experiencing high levels of pollution. This includes developments within identified areas of sub-standard air quality (as shown on the Policies Map and Figure 8).

18.76 Part 1(c) requires development to demonstrate that they will not have a negative impact on open or water spaces. This is particularly applicable to tall buildings, as the overshadowing and light spill effects of tall buildings can have negative impacts on ecosystems in both blue and green spaces, and in many cases it is preferable to set taller buildings back from the edge of these spaces and step heights down as developments approach the water. Tall buildings can also create problems with bird strike, which is a particular risk on bird migration or commuting routes such as along the river Thames and river Lea, and between the Thames and other water bodies, and the design

process should consider options for reducing this risk. However, tall buildings also have the potential to have a unique positive impact on some elements of biodiversity – for example, as the site of nest boxes for peregrine falcons, who prefer to nest on taller buildings. Further examples of biodiversity features that can be included in tall buildings can be found in the High Density Living SPD.

18.77 Part 2 implements the Biodiversity Net Gain (BNG) approach to development, where the biodiversity on the site and its surroundings are improved relative to the pre-development baseline. Where biodiversity is reduced as a result of development, the enhancements to biodiversity provided through the development should provide greater overall biodiversity value than that lost. Given the nature of development sites in the borough, many are likely to have very low baseline levels of biodiversity. To ensure that this does not result in an excessively low biodiversity increase, developments must deliver a minimum of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) in habitat value for wildlife, as measured against the pre-development biodiversity baseline. BNG must be calculated using an appropriate Biodiversity Metric. This applies to all major development proposals, and minor developments which are not exempt under national guidelines. Minor developments that are exempt from mandatory BNG are still expected to deliver biodiversity enhancement in line with the Local Biodiversity Action Plan, appropriate to the scale of the development, but need not use the Defra Biodiversity Metric. Further guidance can be found in the Mayor of London's Biodiversity Net Gain SPG. It should be noted that simply delivering the required BNG is not sufficient justification for developers to argue for an 'acceptable' loss of good quality habitat.

18.78 As part of major development proposals, BNG commitments will be secured and monitored by planning obligation or condition.

18.79 The policy applies to all major development proposals and most minor proposals, with only the following development being exempt from mandatory BNG, consistent with national guidance:

- a. for minor development proposals only, development impacting habitat of an area below a 'de minimis' threshold of 25 metres squared, or 5m for linear habitats such as hedgerows and watercourses;
- b. householder applications;
- c. BNG sites (where habitats are being enhanced for wildlife); and
- d. small scale self-build and custom housebuilding.

18.80 While change of use applications are not specifically exempt, the majority of types of change of use applications will be exempt through the de minimis habitat exemption.

18.81 The latest Tower Hamlets Local Biodiversity Action Plan gives details of priority habitats and/or features for priority species (see parts 1 and 2). Features of biodiversity or ecological value include:

- a. linear corridors, such as watercourses, hedgerows and buffer zones;
- b. veteran trees;
- c. old hedges; and
- d. habitats or species identified as local, London or national priorities, and features which might support such species.



18.82 Where geographically relevant, the Thames River Basin Management Plan objectives should also be incorporated.

18.83 Where a development proposal is located within the Canal & River Trust's statutory consultee notified area, (especially within 10m of the waterway), the developer is encouraged to undertake pre-application discussions with the Canal & River Trust to ensure that appropriate BNG requirements and opportunities are discussed.

18.84 Any development in proximity to a watercourse (10m, or 5m for ditch) is required to achieve 10% uplift in watercourse units.

Developments whose Red Line Boundary is within 10m of a watercourse must carry out the Watercourse Unit Module element of the Biodiversity Net Gain Assessment, with a minimum of 10% net gain in watercourse units gained.

18.85 Part 3 requires major developments to submit an ecology assessment. The ecology assessment should include: (a) information assessing the characteristics and situation of the site, and (b) details on how the proposals will protect or replace, and enhance existing biodiversity on the proposed site, including measures for wildlife habitats and features aimed at particular species.

18.86 Applications should also detail how recommendations are being included in the development proposals. Should the ecology assessment indicate an adverse impact on the biodiversity interest of the site, this will be managed using the hierarchical approach set out in part 5. Should compensation be sought, it would be at the level required to adequately offset the impact on the SINC or protected/priority species, through the provision of an alternative site or habitat.

18.87 Part 4 seeks to protect the integrity of any European or nationally designated site of nature conservation importance. There are no such sites within Tower Hamlets, but development may have the potential to adversely impact sites beyond its boundary – such as the Epping Forest Special Area of Conservation and the Lea Valley Special Protection Area – through air pollution, water abstraction and/or increased visitor pressure. Where the application is of such a scale, location, or nature as to potentially have such an effect on a European site, applicants should seek advice from Natural England as to whether a Habitat Regulations Assessment would be required. The assessment will need to demonstrate that the development will not adversely impact on the integrity of the European site. Proposals will be resisted where they will

have significant adverse impact on European sites.

18.88 Part 5 seeks to protect locally designated SINCs and important species. The presence of protected species is a material planning consideration where a development is likely to result in harm to a habitat or species. Priority species are those identified in the Tower Hamlets Local Biodiversity Action Plan, Species of Conservation Concern in London and Species of Principal Importance in England, as identified under section 41 of the Natural Environment and Rural Communities Act. Developers should ensure that they comply with regulations requiring time-restricted ground works due to the time periods of specific protected species activity.

18.89 Under part 6, 'potentially invasive non-native species' includes plants listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and plants identified as species of concern by the London Invasive Species Initiative and those listed as 'species of special UK concern' within (IAS) (Enforcement and Permitting) Order 2019. Some plants that are regularly used in horticulture produce nectar that is toxic to bees. These include several non-native species of lime trees. These species should not be included in the landscaping of development. In addition, planting schemes should be selected according to their suitability for local growing conditions (soil, temperature ranges, rainfall, periods of inundation, sunlight and shade), their ability to attract wildlife (e.g. nectar rich planting) and to conserve water. Planting along river corridors should only include native species. This will need to be evidenced in the ecology statement.

London Plan policies:

- G6 Biodiversity and access to nature
- G7 Trees and woodlands

Local Plan policies:

- CG1 Mitigating and adapting to a changing climate
- CG7 Managing flood risk
- CG8 Sustainable drainage
- CG10 Air quality

Evidence base:

- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- Tower Hamlets Local Biodiversity Action Plan, 2019
- London Green Grid Supplementary Planning Guidance, 2012
- London Plan Guidance – Urban Greening Factor, 2023
- Review of Sites of Importance for Nature Conservation in Tower Hamlets, 2023
- Tower Hamlets Biodiversity Net Gain Feasibility Study, 2023

Policy BO5 Urban greening

1. The council will expect development proposals to maximise opportunities for urban greening. This includes the integration of high-quality and species diverse landscaping, street trees, wildlife habitat, green roofs and walls, and sustainable drainage systems. They must be designed with consideration given to the site context and the wider landscape setting as well as the layout, design, construction and long-term management of buildings and spaces.
2. Development proposals are required to meet the Urban Greening Factor (UGF) target set out in the London Plan of 0.4 for residential development or 0.3 for non-residential development, based on the factors set out in this policy.
3. The urban greening factors are as follows:

Table 12: Urban Greening Factors

Surface cover type	Factor
Semi-natural vegetation (e.g., trees, woodland, species-rich grassland) maintained or established on site.	1
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1
Native wetland vegetation established in an area of adjacent river or canal if appropriate and agreed with the Canal & River Trust which previously lacked vegetation.	1
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area for the mature tree.	0.8
Mixed native hedges (line of mature shrubs, two shrubs wide and comprised of at least five native shrub species).	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) that meets the requirements of GRO code 2014.	0.7
Flower-rich perennial planting.	0.7

Surface cover type	Factor
Rain gardens and other vegetated sustainable drainage elements.	0.7
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6
Green wall – modular system or climbers rooted in soil.	0.6
Allotment gardens or similar community or residential growing spaces.	0.6
Shrub planting (including hedges that don't meet the definition of native mixed hedges)	0.5
Groundcover planting.	0.5
Aeridity grassland (species-poor, regularly mown lawn).	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO code 2014.	0.3
Water features (chlorinated) or unplanted detention basins.	0.2
Permeable paving.	0.1
Sealed surfaces (e.g., concrete, asphalt, waterproofing, stone).	0

4. Development proposals must be consistent with the provisions of the Tree Management Plan 2020-2025 including protecting and increasing the provision of trees through:

- a. protecting all trees, including street trees;
- b. incorporating native trees, wherever possible; and
- c. providing replacement trees, including street trees, where the loss of or impact on trees in a development is considered acceptable.

5. Development proposals involving the regeneration of existing council property – including housing stock, estates, public realm, and place improvements – must seek to maximise urban greening, whether through tree planting, green roofs, or any other measures that will enhance the biodiversity and greening of existing developments.

Supporting text

18.90 Urban greening is a term used to describe a wide range of measures that can be incorporated into buildings and spaces to increase green cover in the borough. These measures include but are not limited to: tree planting, naturalised biodiverse landscaping, green roofs and walls, hedges, climbers, plants for pollinators, de-paving, rain gardens and sustainable drainage systems using natural or semi-natural features. Urban greening can provide multifunctional benefits such as for climate change resilience, amenity including air quality, nature conservation and local character (see part 1).

18.91 Part 2 is based on Policy G5 of the London Plan, which sets the Urban Greening Factor (UGF) requirement for major developments.

18.92 The UGF is a model used to provide a baseline for the amount of green cover that development will be expected to achieve, taking into account various site development factors. In addition to setting minimum UGF requirements, the London Plan allows boroughs to develop a tailored approach to the factors set out in that policy to encourage amenity space, enhance biodiversity, address the urban heat island effect, and provide sustainable storm water drainage.

18.93 The London Plan explains that the urban greening factor for a proposed development is calculated using the formula: $(\text{Factor A} \times \text{Area}) + (\text{Factor B} \times \text{Area}) + (\text{Factor C, D, etc} \times \text{Area}) / \text{Total Site Area}$

18.94 A site of 1,000sqm total area which provides 600sqm of extensive green roof, 250sqm of hard sealed car parking, 100sqm of open water, and 50sqm of amenity grassland would score as follows: $(0.7 \times 600) + (0 \times 250) + (1 \times 100) + (0.4 \times 50) / 1000 = 0.54$. This would exceed the target score of 0.4 and therefore meet the requirements of the policy, and provide a number of benefits to the health and well-being of residents



18.95 Part 3 sets out our approach to the urban greening factor in the borough. Unlike the London Plan policy, this is intended to be applied to developments of all sizes, and the non-residential approach does not exclude B2 and B8 uses. This approach is justified on the basis of the urgency of the climate crisis, its effects on biodiversity and flood risk, the presence of a large area of deficiency of access to nature in parts of the borough, and the importance of providing additional green spaces throughout the borough.

18.96 Table 11 sets out the factors to be used in calculating the urban greening factor score for developments. This table is based on table 8.2 of the London Plan, but with the following changes:

- Addition of native wetland vegetation along rivers and canals, to support the rehabilitation and rewilding of the Borough's water spaces.
- Addition of allotments and growing spaces, to encourage delivery of these kinds of spaces on new developments. These spaces do not provide as high a biodiversity benefit as wetland habitat creation but provide similar benefits to groundcover planting with additional social and community benefits, and have therefore been given a slightly higher factor than groundcover planting. These spaces should ideally be located on ground level, but rooftop growing spaces may also be appropriate where they are made widely accessible to residents and the surrounding community.
- Hedges have been separated into mixed native hedges, and other kinds of shrubbery planting. The former are felt to provide a much higher biodiversity benefit than the latter, and this has been reflected in the scoring.

18.97 Due to the environmental importance of trees, at least a 'one for-one' replacement rate is required for any trees affected by a development (see part 3). Where development proposals can demonstrate that these cannot be incorporated on site, we will consider the provision of a replacement tree on a suitable site, as close to the development as possible, subject to investigation and submission of details of any below ground utilities, to establish tree planting is appropriate and practical in that location. We will also expect development proposals to incorporate additional trees, wherever possible. Their location must be carefully considered to ensure there is no adverse impact on overshadowing, wind effects, air quality, ecology, or flood risk. Where trees are proposed along the river corridor, their positioning must be carefully considered to ensure there are no adverse impacts on ecology or flood risk. A buffer of at least five metres is

suggested between the bank and tree. We will take a 'right tree for the right site' approach which takes account of historic context, availability of space, soil conditions, wildlife value, potential improvements to air and soil quality, provision of shade and reducing the effects of and adapting to climate change. This will need to be evidenced in the ecology assessment.

18.98 Part 5 emphasises the need for urban greening measures to improve the overall quality of the public realm within the borough, particularly in regeneration projects where the ability to introduce additional green open space may be limited.

London Plan policies:

- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands

Local Plan policies:

- CG1 Mitigating and adapting to a changing climate
- CG7 Managing flood risk
- CG8 Sustainable drainage
- CG10 Air quality

Evidence base:

- Tower Hamlets Open Space Strategy, 2017
- Tower Hamlets Green Grid Strategy, 2017
- Tower Hamlets Infrastructure Delivery Plan, emerging
- All London Green Grid Supplementary Planning Guidance, 2012

Policy BO6 Play and recreation spaces

1. Development proposals must provide or help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation, and play. This will be achieved through:
 - a. protecting existing play, informal recreation, and sporting facilities. The loss of play and informal recreation facilities will be resisted unless replacement space of equivalent size, quality of amenity, and functionality is provided either onsite or in the local neighbourhood, with unrestricted public access, and
 - b. maximising opportunities to deliver new and improved play and informal recreation facilities, along with public realm enhancements, so that sports and recreation facilities and play spaces can be reached safely and easily throughout the borough.
 - c. adapting play space to be accessible for those with disabilities through providing areas which contain accessible facilities such as the provision of equipment adapted for children with additional needs, quiet seating areas and visual aids.
2. New play and informal recreation facilities should be designed to meet the needs of Tower Hamlets' population, be inclusive, accessible, and safe, through:
 - a. co-design with local adults, children and young people, parents, and carers on the design of new provision early on in the development of an application; and
 - b. designing play and informal recreation facilities which are exciting and engaging for all abilities and ages. Facilities should be well-designed, secure, and free to use. They should provide for a range of interests and address barriers to play by tackling issues of inclusion and equity; and reduce the harm caused by poor air quality through the favourable location of play and informal recreation facilities to minimise exposure to pollutants and careful layout and choice of soft landscaping.
 - c. ensuring play space is accessible from surrounding all public spaces; enabling a range of users.
 - d. providing play public space nearby existing community amenities, not solely existing park spaces such as GP surgeries, community centres and areas which have a high deficiency of play space.
3. The net-loss of play space will not be acceptable as development proposals will instead need to redevelop these spaces into higher value play spaces. This would include, but would not be limited to; enhancing the accessibility and facilities available to the public. Where construction requires the redevelopment of an existing play space, a temporary play space of the same dimensions and quality will need to be provided within the vicinity of the development site until the improved play space is completed.

Supporting text

18.99 Part 1 recognises that play space is essential for the cognitive and physical development of children and young people and their ongoing health and well-being. Space for recreation is also essential for people of all ages and supports improved physical and mental health and well-being and provides spaces for residents to meet and interact socially, particularly with those outside of their existing social spheres.

18.100 It is important that play space is not restricted to parks but is integrated into a range of public spaces. This can help enable liminal spaces to become areas where people can play and rest, enabling good design. This will allow for the environment to become more engaging and connected to existing public space facilities.

18.101 Part 1(a) resists the loss of existing play, recreation, and sporting facilities on the basis that the borough's open space and indoor recreation and sports facilities face pressure from the borough's increasing population. For the purposes of this policy, the local neighbourhood is defined as an area within 15-minute walking distance (1km) using existing pedestrian routes.

18.102 The Play Space Strategy, based on findings from the Tower Hamlets Child Play Space Audit (2024), sets out an indicator of where existing play spaces need to be protected and enhanced throughout the borough due to the overall deficiency of play space.

18.103 It is encouraged that high value play spaces are identified and developed in areas which are deficient in play space as indicated in the Play Space Audit. Developers will be required to ensure play space is under review and will be monitored by the consent and delivery of new high-value play spaces through planning applications.

18.104 Development proposals must consider the existing play space identified within the most recent play space audit to consult and understand what is required on the site. The temporary provision and re-provision of high value play space would then be delivered through a Construction Management Plan.

18.105 Poor access, or perceptions of poor access can be a major factor limiting use of play and informal recreation spaces and formal sports facilities. Where development proposals include the provision of new play and informal recreation spaces and sports facilities, these should be designed to be welcoming to all communities in the borough, with clear routes to the spaces and facilities and wayfinding or signage from the nearest major route where necessary. Where a development proposal is in close proximity to an existing play or informal recreation space or sports facility, it should provide public realm enhancements that improve the routes to the space or facility, particularly where it is a larger space or facility that is likely to draw users from the wider neighbourhood.

18.106 Play and recreation spaces and facilities should serve all members of the Tower Hamlets community and should be genuinely inclusive.

18.107 To achieve this, development proposals are encouraged to engage in co-design with local residents, with a particular emphasis on engaging children and young people in the design process. This should occur as early in the design process as possible to ensure that the co-design is meaningful and can influence the layout of other elements of the development proposal (see part 2(a)).

18.108 Part 2(b) provides key design criteria for play and informal recreation facilities. Play spaces should be positioned at least 50m

away from highly used roads to ensure vulnerable residents that are at a heightened risk of negative health outcomes, due to exposure to air pollution and high ambient noise level sources, are not impacted when playing. More information and guidance can be found in the Mayor of London's Play and Informal Recreation SPG. New development should also be consistent with Play England Design Principles.

London Plan policies:

- S4 Play and informal recreation
- S5 Sports and recreation facilities

Local Plan policies:

- CG10 Air quality
- HC10 Housing standards and quality
- PS3 Securing design quality
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- MC2 Active travel and healthy streets

Evidence base:

- Tower Hamlets Open Space Strategy, 2017
- Active Design Guidance, 2023
- Tower Hamlets Playing Pitch Assessment, 2017
- Tower Hamlets Joint Strategic Needs Assessment, 2023

Policy BO7 Food growing

1. The council will seek to protect existing allotments and community gardens and maximise the provision of new food growing spaces to support sustainable food growing locally, and to enhance opportunities for leisure, social interaction, improved physical and mental health, and education.
2. Major development proposals that include housing, and development proposals for community facilities, will be encouraged to include and equip space for community gardening and food growing. Where such provision exists and a site is to be redeveloped, development proposals will not be supported unless the existing provision is retained or re-provided, and if necessary, enhanced (i.e., increased in size and/or improved in quality).
3. Where it does not conflict with other policy objectives, land use priorities or exceed the Soil Guideline Values set by the Environment Agency, the council will support the use of land and buildings as new allotments for local food growing spaces and production including:
 - a. the temporary use of vacant or derelict land; and
 - b. the use of incidental open space on housing estates and other open space areas.

Supporting text

18.109 Food growing can have a positive impact on physical and mental health and well-being, creating opportunities for social interaction and cross-cultural engagement, as well as providing a source of fresh and low-cost food for local communities. In recognition of these positive impacts, part 1 seeks to ensure that all lawful existing allotments and community gardens are retained and enhanced where possible.

18.110 Given the high level of demand for existing allotments and community gardens and the increased pressure that new development is placing on all such facilities, part 2 encourages development proposals for community facilities and major residential developments to provide and properly equip space within their sites for community gardening and food growing. Any new allotment space should be accessible and inclusive and should be considered in the context of the wider public realm. Maximising the reuse of rainwater for watering and the provision of watering points should be considered when providing new facilities.

18.111 Allotments and community gardens are good for community activities and should be developed with accessibility in mind, considering adequate space provision for wheelchair access and wayfinding.

18.112 Vacant sites and incidental open spaces or lawn spaces within housing estates and elsewhere in the borough have the potential to be used for community gardening and food growing with relatively minimal investment. Part 3 provides support for such uses.

18.113 There is potential for land to contain contaminated soil with harmful substances such as heavy metals and asbestos. Prior to the use of a site for food growing, a land contamination assessment will need to be undertaken to ensure that the soil does not exceed the Soil Guideline Values and would not pose an immediate risk to public health. This would be undertaken prior to a development proposals approval or as a condition.

London Plan policies:

- G8 Food growing

Evidence base:

- Tower Hamlets Open Space Strategy, 2017

19. Movement and connectivity

MC1 – Sustainable travel

MC2 – Active travel and healthy streets

MC3 – Impacts on the transport network

MC4 – Parking and permit-free

MC5 – Sustainable delivery, servicing and construction



Introduction

19.1 This chapter focusses on how residents and visitors travel across the borough, considering how easy, accessible, and safe it is to walk, wheel, cycle, and take public transport in Tower Hamlets. This chapter also sets out to address how the borough can support those in the community who depend on private vehicles for work or mobility in accordance with the Mayor's commitments outlined in the 'Cleaner and greener future for Tower Hamlets' document (2023).

19.2 Tower Hamlets is a well-connected borough, with access to the London Underground, Docklands Light Railway, National Rail connections and an extensive bus network. There has been significant increase in public transport infrastructure to accommodate growth, most recently including the opening of the Elizabeth Line at Whitechapel and Canary Wharf stations. The borough has good levels of sustainable travel; in 2023, Tower Hamlets was ranked 7th out of all London Boroughs on the Healthy Streets Scorecard, and improvements to walking and cycling connections means that over 80% of trips last year were by sustainable modes (public transport, walking, and cycling). However, there are some areas of the borough which are less well served by public transport, particularly towards the east of the borough.

19.3 Planned growth in new homes and jobs, coupled with London's overall growth, will significantly increase resident, commuter, and freight movement within and through the borough. This will create further pressure on the road and wider public transport network which is already at or close to saturation in some parts of the borough at peak times, as well as adversely affect air quality and the natural environment.

19.4 Many areas of the borough face significant issues with traffic and congestion. The major highway connections, particularly the A11, A12 and A13 trunk roads carry large numbers of motor vehicles through the borough, which results in areas of high air pollution. This is linked to lower-than-average life expectancies for residents, high levels of asthma and reduced lung capacity in children.

19.5 Furthermore, it is estimated that nearly a quarter of borough residents do not get the recommended minimum amounts of physical activity levels to support health and well-being. The health implications of physical inactivity are also an important local issue, which the promotion of active travel can help to address.

19.6 This Plan seeks to facilitate change to increase healthy and sustainable travel by supporting the development of a healthy, safe, and inclusive transport network across Tower Hamlets that incentivises a modal shift to walking, wheeling, cycling, and public transport. This will reduce traffic congestion and pressure on the public transport network, while contributing to a cleaner and healthier environment for borough residents and visitors.

19.7 This section contains the following policies:

- MC 1: Sustainable travel
- MC 2: Active travel and healthy streets
- MC 3: Impacts on the transport network
- MC4: Parking and permit-free
- MC5: Sustainable delivery, servicing, and construction



Policy MC1 Sustainable travel

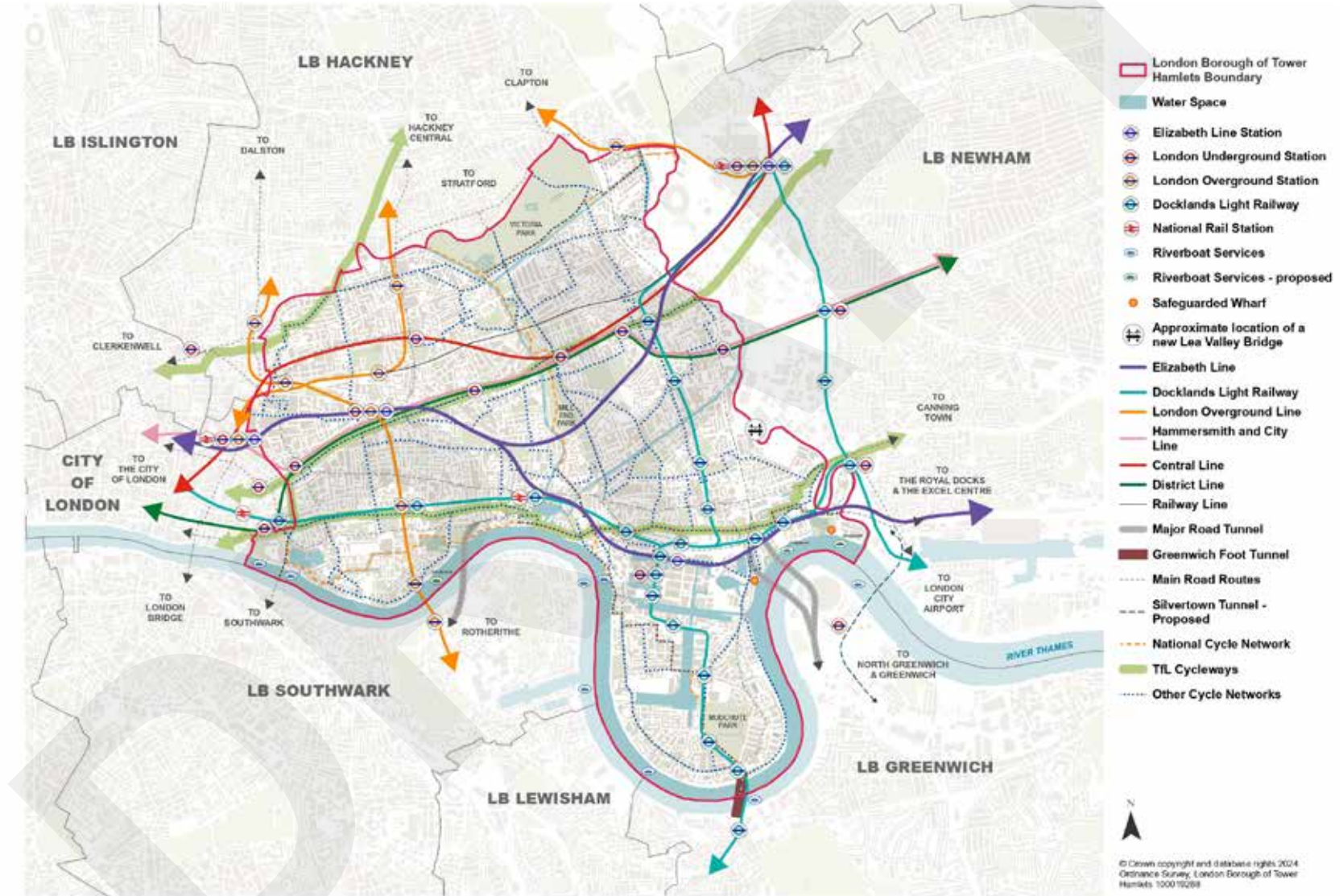
1. The council will promote the development of a healthy, safe, and environmentally friendly transport system that is inclusive, accessible, and affordable for all who live, work, study in, and visit the borough, in accordance with the latest guidance. Development proposals will therefore be expected to:

- a. ensure the primary mode of travel for short trips in the borough is focused on active travel modes, enabling more people to walk and cycle, in line with 15-minute city principles, by utilising a Healthy Streets Approach in the design and management of the development;
- b. improve access to public transport, including water transport, to reduce reliance on private vehicles;
- c. be integrated effectively alongside public transport, walking, wheeling, and cycling routes to maximise ease of access to sustainable travel modes in line with the sustainable mode hierarchy, reduce severance and increase permeability across the borough;
- d. be focused within areas with high levels of public transport accessibility and the town centre hierarchy, in respect of developments generating significant levels of trips; and,
- e. not adversely impact the capacity, quality, accessibility, and safety of the transport network in the borough.

2. Where appropriate, development must support and safeguard land for transport and freight infrastructure enhancements to meet the demands arising from future growth, including improvement to capacity, connectivity, quality, and interchanges across the network.

3. The council will also support applications for new standalone micro-consolidation centres within the borough in appropriate locations.

Figure 20: Connectivity map



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Supporting text

19.8 To address the significant issues surrounding highway congestion, poor air quality and capacity constraints across the public transport network, a number of strategic and local transport improvements are underway, planned, or have been recently delivered across Tower Hamlets. However, further infrastructure investment will be required to accommodate the predicted population and employment growth, and in some locations development could be significantly hindered without appropriate enhancements to the transport network. There is a particular need to invest in active, efficient, and sustainable transport infrastructure, to make the most efficient use of space in a rapidly growing borough, and ensure that those who are still required to drive for employment, caring, or family reasons are able to do so.

19.9 Tower Hamlets has a low car ownership ratio with only 33.6 % of households owning one or more cars, compared to 57.9% across Greater London. Before the pandemic, data indicated that residents preferred sustainable transport modes to travel to work, such as public transport (60%), walking or cycling (26%), with commuting by car at 12%, which was lower than the London average, at 30%. While travel-to-work patterns have shifted dramatically following the COVID-19 Pandemic, recent demand patterns indicate that weekday bus demand has recovered to 82% and underground to 80% of pre-pandemic levels. This reinforces the need for developers to prioritise sustainable travel in the design and delivery of their schemes, particularly walking, cycling and public transport, helping to relieve congestion, reduce air pollution and improve journey times.

19.10 This policy seeks to manage growth to ensure it does not increase traffic congestion and crowding on public transport due to



trip generation from developments and through-trips. The location of development proposals close to services and amenities, integration with the transport network, prioritising the most sustainable forms of travel, and facilitating and enabling behaviour towards the use of public transport and active forms of travel are crucial factors in accommodating the predicted population and economic changes over the plan period. Development proposals must accord with the latest guidance and policy approach set out in the London Plan, The Mayor of London's Transport Strategy, the Tower Hamlets Transport Strategy (2019) and seek to achieve the targets of the most recent Local Implementation Plan (LIP).

19.11 Part 1(a) seeks to ensure that development proposals support walking and cycling as a primary means of travel in line with the London Plan (2021) Healthy Street Approach. Development should incorporate and improve pedestrian and cycling environment that is safe, accessible, and permeable both within the borough and into neighbouring boroughs. It also identifies the necessity to link development to the borough's pedestrian networks, such as the Green Grid network and Thames Path, and strategic cycling networks, and improve access to river transport where possible, in accordance with the borough's Transport Strategy (2019).

19.12 Part 1(c) ensures that development proposals support the use of, and connect to, public transport, cycling and walking facilities that surround the site. The design, management, and operation of a development should encourage its users to travel in a sustainable manner. It should also be permeable and provide links to existing or planned infrastructure as well as relevant on-site infrastructure, such as bicycle storage, workplace showers and changing facilities.

19.13 Part 1(d) identifies the need for development proposals to be located in an area appropriate to the number trips it generates. The scale of development must reflect the level of public transport available. Transport for London (TfL) has mapped the Public Transport Accessibility Levels (PTAL) across the whole of London; the PTAL toolkit is a measure of accessibility to the public transport network, taking into account walk access times and service availability. Areas are graded on a scale between 0 and 6b, with a score of 0 is very poor access to public transport, and 6b is excellent access to public transport. In Tower Hamlets, ratings range from highly accessible areas – such as Canary Wharf, Whitechapel, Bethnal Green, Bow and Mile End - to areas with lower levels of public transport accessibility, including parts of the Lower

Lea Valley. It should be noted that PTAL values are regularly updated, and the latest values should be used to assess accessibility levels.

19.14 The scale of development should also have regard to the town centre hierarchy, whereby development densities should consider the availability of nearby shops, services, and amenities, thereby reducing the need to travel.

19.15 Part 1(e) seeks to ensure that development proposals do not have a detrimental impact to the safety and efficient operations of existing transport networks. In particular, development proposals must ensure consideration of:

- the safety of the highway user and/or the ability of public transport providers to safely operate services which includes consideration of adequate driver welfare facilities and bus stands;
- the demand on the borough's transport networks beyond operational limits and/or capacity;
- the potential reduction in the quality of stations, stops, or services; or
- restrictions on access to the same services.

19.16 Development proposals are expected to be well-integrated with the public transport network and contribute to its efficient running and service improvements. Developers should ensure they engage early with relevant bodies (e.g. Transport for London) to establish the likely impacts and/or appropriate mitigation measures towards public transport to be funded through developer contributions in accordance with Policy DV1.

19.17 Part 2 identifies the role of development proposals in supporting improvements and enhancements to the borough's transport and freight infrastructure (including safeguarded wharves and consolidation

centres). Applicants should work with the council to support planned and future transport initiatives that underpin new growth; any development that adversely affects or planned infrastructure improvements will not be supported.

19.18 Where infrastructure enhancements will be required to meet the demands arising from future growth, the council will work in partnership with neighbouring boroughs, Transport for London and other agencies (e.g. Highways England) to understand and address the future transport needs of the borough and cross-boundary transport needs.

19.19 The list below sets out a number of planned interventions that are required to support the borough's transport network.

- New pedestrian and cycle networks, by reducing severance of major arterial roads, improving cross-river and other waterways connections, and improving connectivity for pedestrians and cyclists;
- New cycle infrastructure, including Cycleway routes and the Mayor of London's cycle hire network;
- Enhancements to the bus network to South-East London facilitated by the Silvertown Tunnel (2025), including new route SL4 Grove Park – Canary Wharf, which will form part of the emerging Superloop London orbital bus network;
- Improvements to DLR network capacity, station improvements (including improving step-free access and improved modal interchange) and other rail network improvements; and
- Improved river services and potential new piers at Wapping, Canary Wharf East and Trinity Buoy Wharf and Blackwall Reach.
- North South Route from Hackney Wick Station, across the Hertford Union Canal via the new Roach Point Bridge, to Fish Island.³³

³³ As identified in the LLDC Local Plan and the Hackney Wick Fish Island SPD

19.20 In addition, as set out in the Lower Lea Valley Connection and Movement Study, development proposals in the Leaside Valley area to the east of the borough are expected to contribute to the delivery of the following priority interventions to improve walking and cycling connections:

- High-quality cycle provision along the B140 (Devas Street and Devons Road), including potentially through removal or relocation of on-street parking.
- Junction re-design at Campbell Road, Violet Road and Devons Road to replace roundabouts with T-junctions, remove guard rails, and relocate pedestrian crossings closer to desire lines.
- Signalise junction of Devas Street, A12, and Twelvetrees Crescent, and open up east-west walking and cycling movement across the A12 at this location.
- High-quality cycle provision along Violet Road, Morris Road and Chrisp Street, including potentially through removal or relocation of on-street parking.
- Creation of an east-west walking and cycling 'spine' from the River Lea to Langdon Park DLR Station by delivering high-quality cycle provision and improved footways along Lochnagar Street, Zetland Street, St Leonard's Road, and Langdon Park. Closure of the slip road from the A12 onto Teviot Street, to allow a wide footway and easier north-south movement.
- Creation of an east-west walking and cycling 'spine' between Abbott Road and Chrisp Street Market by delivering dedicated cycling provision and continuous footway crossings along Blair Street and Brownfield Street. This should include environmental improvements to the subway crossing at Balfron Tower, a new crossing between

the top of Abbots Road and Jolly's Green, and aligning the Chrisp Street crossing with Brownfield Street and converting it to a 'toucan' crossing.

- Traffic calming on Abbott Road, including high-quality cycling provision and continuous footway crossings. Upgraded, 'toucan'-style crossings should be provided at the junctions with Aberfeldy Street, Dee Street, and Blair Street.
- Remodeling of Leamouth Junction for safe cycle and pedestrian movement, including introduction of high-quality cycling provision on the roundabout and on Leamouth Road.

19.21 These interventions should be delivered through funding mechanisms including S106 agreements, CIL payments, and other sources of funding.

19.22 Further interventions that the council will support include ensuring partnership with the London Borough of Newham and developers on relevant sites, to deliver up to five new crossings of the River Lea, and one additional bridge entirely within Tower Hamlets. Where relevant, development proposals on the Tower Hamlets side of the river will be expected to safeguard land to contribute towards the delivery of:

- Lochnagar Bridge, from Lochnagar Street to Canning Town Riverside
- Poplar Reach Bridge, from the north of the Leven Road site to Cody Dock
- Mayer Parry Bridge, from the south of the Leven Road site to Canning Town Riverside
- Leamouth Crossing, from Orchard Place to the Limmo Peninsula
- Trinity Buoy Wharf to Thames Wharf Bridge
- A13 walkway, from the Blackwall Trading Estate, under the A13, to the Leamouth Depot site

19.23 In addition to safeguarding land, that the layout and design of development proposal on or adjacent to these crossings responds to these new connections with active and viable routes that are safe and welcoming for all users.

19.24 These lists are not exhaustive, and new interventions may arise from other transport strategies and assessments alongside regional policies, such as the emerging Tower Hamlets Infrastructure Development Plan. Development may also be required to contribute financially towards new transport infrastructure and improvements in accordance with Policy DV5.

London Plan policies:

- S115 Water transport
- T1 Strategic approach to transport
- T2 Healthy Streets
- T9 Funding transport infrastructure through planning

Local Plan policies:

- CG9 Air quality
- DV1 Areas of growth and opportunity within Tower Hamlets
- DV5 Developer contributions

Evidence base:

- Mayor's Transport Strategy
- Strategic Transport Assessment, 2016
- Tower Hamlets Transport Strategy, 2019-2041
- Lower Lea Valley Connection and Movement Study, 2020
- East of the Borough AAP Transport Report, 2020

Policy MC2 Active travel and healthy streets

1. All development proposals that involve changes to streets should implement the Healthy Streets Approach.
2. Development proposals must demonstrate how they have applied the London Plan Healthy Streets Approach in the design process. This will be achieved by requiring:
 - a. all major development proposals to submit a Healthy Streets Assessment as part of the transport assessment; and
 - b. positive engagement with the Healthy Streets Approach to deliver public realm and other improvements that support walking, wheeling, cycling, and the use of public transport.
3. Development proposals must be designed to maximise the contribution of the public realm to encourage and enable active travel modes by:
 - a. safeguarding, maintaining, and enhancing the Borough's network of walking routes and cycleways, including the Thames Path and the Green Grid Network;
 - b. providing unobstructed footway widths of at least 2 metres, or as calculated using the TfL Pedestrian Comfort Level tool, whichever is greater;
 - c. ensuring contiguously permeable public realm by foot, wheeling and cycle, and connect to local walking and cycling networks as well as public transport;
 - d. providing legible routes for walking, wheeling, and cycling to

and within sites, ensure signage, street signs and place names are easy to read; where appropriate contributing to the 'Legible London' programme;

- e. ensuring an inclusive-by-design approach, with consideration for the accessibility and safety of all users, giving particular attention improving accessibility of streets for older users and users with disabilities, and consider the safety and comfort in the public realm of women, girls, and gender diverse people, by:
 - i. having well-maintained streets which are free from clutter and meet minimum width requirements (above);
 - ii. ensuring good sight lines and visibility with plenty of well-lit entrances and exits;
 - iii. maximising opportunities for passive surveillance by using ground floor units to create active frontages, where feasible;
 - iv. considering the needs of both daytime and night-time uses; quieter daytime routes that favour access to green spaces and avoid busy roads, and night-time routes that pass by transport hubs and busier pedestrian ways; and
 - v. providing segregated routes for pedestrians and cyclists where possible, and shared use routes in streets with high pedestrian or cyclist flows should be avoided.
- f. supporting the delivery of the Tower Hamlets Transport Strategy (2019) and the Mayor of London's Cycling Action Plan 2 (2023), by:
 - i. contributing to the expansion of the strategic cycle network, providing protected cycle lanes where required; and

- ii. providing high-quality long- and short-term cycle parking within new developments that is fit-for-purpose, secure, well-located, and is suitable for a wide range of cycle types, including adapted cycles and cargo bikes (see Policy MC4).
- 4. Development proposals that adversely impact the safety, accessibility, legibility, connectivity, and convenience of the Borough's walking and cycling network will not be supported.

Supporting text

19.25 Active travel aims to promote and encourage walking, cycling, and other active modes of transportation to improve public health by increasing physical activity levels, reduce air pollution and greenhouse gas emissions, reduce traffic congestion, and improve road safety, and create more liveable cities and communities. Overall, active travel aims to create sustainable and healthier transportation options for individuals and communities. In committing to becoming one of the best places to walk and cycle in London, Tower Hamlets can fulfil these aims.

19.26 Physical inactivity is a major cause of disease, and nearly a quarter of Tower Hamlets' residents do not get the recommended minimum levels of daily physical activity. In addition, encouraging more people to choose active travel will reduce reliance on private vehicles, especially for short journeys, and help to relieve pressure on the public transport network.

19.27 The 'Healthy Streets Approach' prioritises the health and well-being for all those who live, work, study in, and visit the borough, by putting human needs and experiences at the centre of public realm and transport design. Streets should be welcoming places where everyone feels able to spend time, engage in physical activity, or socialise with other people. Healthy streets support many types of active travel, from commuting to work, walking for pleasure, or cycling with children to school, all of which require different kinds of route. Healthy streets support vibrant and lively communities, where different groups can come together to socialise and enjoy public spaces. The design of healthy streets should have regard for other relevant best practice guidance, such as Sport England's Active Design Guidance (2023).

19.28 This policy embeds the council's road user hierarchy, which prioritises walking and cycling, then public transport use, as sustainable modes of travel, followed by all other modes of motorised transport.

19.29 Part 1 of this policy requires development proposals to improve the quality and connectivity of walking, wheeling, and cycling routes in the area. Development proposals are required to demonstrate how they have applied the Healthy Streets Approach as set out in the London Plan as part of the transport assessment.

19.30 Part 2 requires major development proposals to submit a Healthy Streets Assessment as part of the transport assessment. By utilising the Healthy Streets Design Check tool which scores proposed street design interventions against the 10 Healthy Street Indicators, the results can be used to measure how design features may improve a potential street, as well as identify areas of poor street design opportunities to make further improvements.³⁴

19.31 Part 3 sets out how development proposals should engage positively with the design of high-quality public realm within and in the vicinity of the development, to encourage and enable active travel. Walking and cycling networks must be:

- safe;
- accessible;
- legible and easy to use;
- connected; and
- convenient.



19.32 Part 3(a) requires development proposals to safeguard and contribute to maintaining and enhancing the boroughs network of walking routes and cycle ways, particularly the Thames Path and Green Grid Network. The Green Grid Strategy identifies a series of strategic projects to improve cross-borough connections and improve active travel and urban greening. This policy should be read in conjunction with Policy BO2 Open spaces and the green grid network.

19.33 Part 3(b) requires developments to provide a minimum unobstructed footway width of at least 2 meters. To support active

³⁴ Healthy Streets Design Check England, DfT (2021)

travel, footpaths should be spacious enough to support a wide range of users and uses. Street clutter can be anything which takes up additional space on the pavement, such as signage, cycle parking, café seating, planters, and EV charging points. While many of these items individually can contribute to improved look or comfort of the street, such as urban greening, improved lighting, and places to rest and socialise, when crowded together they can obstruct the footway and hinder pedestrian movement. Obstacles can significantly hinder the ability to navigate the public realm, and particularly impact people with mobility or visual impairments. In some instances, such as within town centres and other high traffic areas, minimum unobstructed footway widths of 2 metres may not be sufficient to enable adequate flow of pedestrians. The Pedestrian Comfort Level tool should be used determine appropriate footway widths based on the number of pedestrians per square metre and pedestrian flows per minute.

19.34 Part 3(e) requires developments to be inclusive-by-design, considering the needs, comfort, accessibility, and safety of all users. Safety can be described as a spectrum of exclusion, which can be experienced in the form of mild inconvenience, significant discomfort, to severe danger. This is more commonly experienced by women, girls, and gender diverse people; from the inconvenience of having to carry pushchairs and small children up flights of stairs, or struggling to find a public bathroom; or feeling uncomfortable taking certain routes home at night, to being threatened by verbal harassment and physical violence. The intersection of marginalised identities can compound and exacerbate experiences of exclusion from the public realm, while also considering that the lived experiences of women, girls, and gender diverse people is incredibly varied. Ultimately, streets that are inclusive-by-design will improve the experiences, comfort, and safety for all users.

19.35 In addition, to minimise potential risk of conflict or collision



between users, where possible pedestrian footways and cycle lanes should be clearly designed to be perceived as separate facilities, and mixing pedestrian and cyclist should be avoided. This is particularly important to protect vulnerable road users, for example, those who may not be able to see or hear an approaching cyclist. Best practice guidance such as the DfT Inclusive Mobility Guidance should be followed.

19.36 Part 3(f) requires development proposals to support the uptake of cycling in Tower Hamlets. Safety and perceptions of safety is often cited as a key reason why people choose not to take up cycling, with particular risk from heavy traffic, HGVs, and hostile motorists.

19.37 To overcome this, cycling routes, networks, and facilities should be designed to a high quality as outlined in the Healthy Streets Approach, with clear separation from pedestrian and motor traffic where possible.

19.38 Part 4 requires development to ensure the safety, accessibility, legibility, connectivity, and convenience of the borough's walking and cycling network to help ensure we meet the aims related to active travel aims and creating a sustainable and healthier transportation options for individuals and communities.

London Plan policies:

- GG3 Creating a healthy city
- T2 Healthy Streets
- T5 Cycling

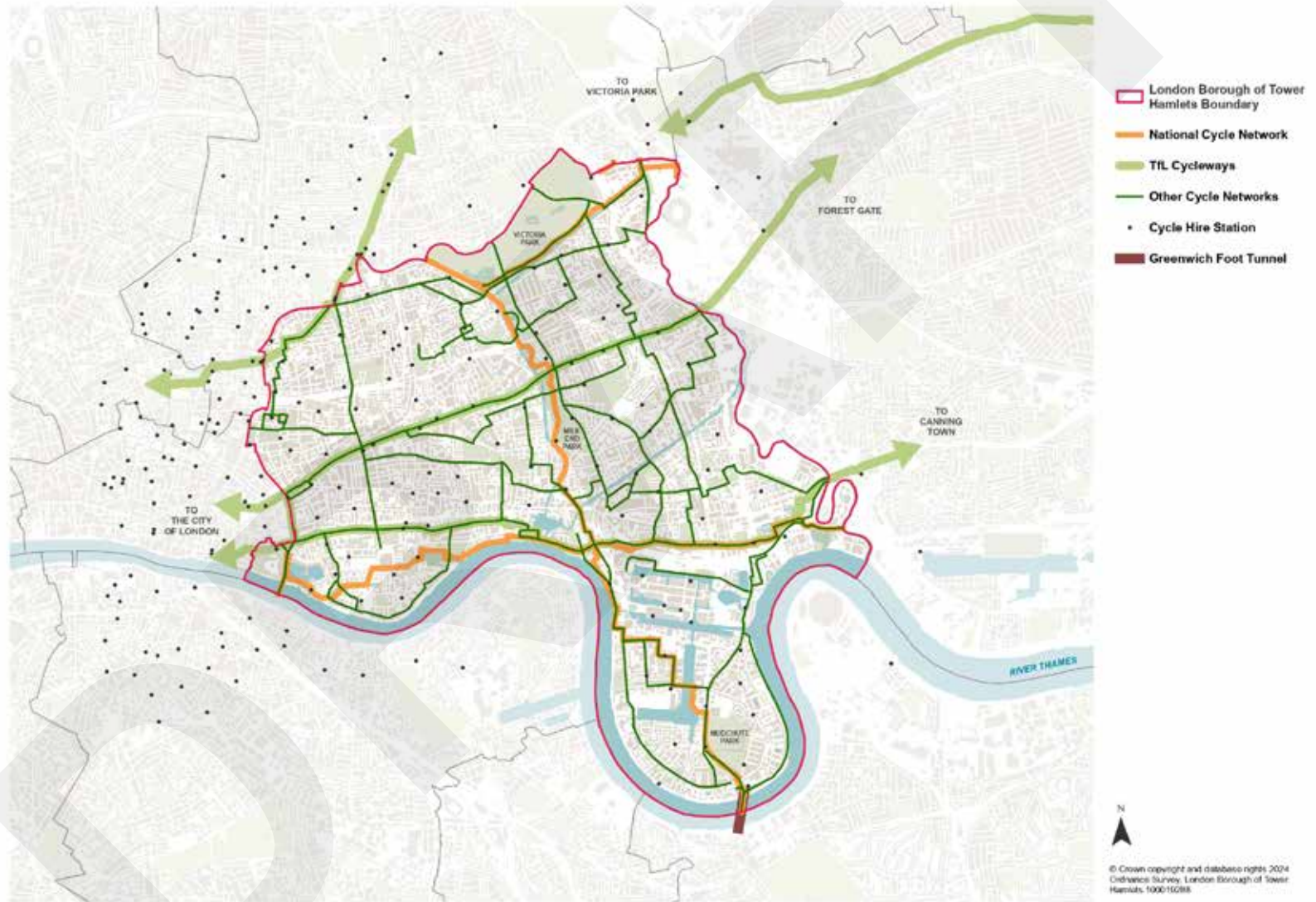
Local Plan policies:

- CG9 Air quality
- PS4 Attractive streets, spaces, and public realm
- PS5 Gender inclusive design
- BO2 Open spaces and the green grid network

Evidence base:

- Mayor's Transport Strategy
- Sustainable Transport, Walking and Cycling LPG, 2022
- Tower Hamlets Transport Strategy, 2019-2041
- Healthy Streets for London, 2017
- Active Design Guidance (Sport England) 2023
- Inclusive Mobility (DfT) 2021
- Gender Inclusive Design, 2023
- London Cycling Design Standards (LCDS), 2014
- Pedestrian Comfort Guide, 2019
- Cycle parking implementation plan, 2019
- New cycle route Quality Criteria, 2019
- Tower Hamlets – A Cycling Borough, 2016

Figure 21: Map of the cycle network



Policy MC3 Impacts on the transport network

1. Development proposals must ensure impacts on the transport network are mitigated and avoided. This will be achieved by ensuring that:
 - a. impact to the transport network is reduced by promoting and enabling active and sustainable travel; and
 - b. environmental impacts are reduced, including reducing congestion, emissions, and improving air quality and public health.
2. Major development proposals and any development that is likely to have a significant impact on the transport network are required to submit a transport assessment or transport statement, and/ or travel plan as part of the planning application. Transport assessments should focus on embedding the Healthy Streets Approach within and around new developments. Transport assessments should be accompanied by an Active Travel Zone (ATZ) assessment, as well as a Night-time ATZ assessment where necessary.
3. Development proposals that will have an adverse impact to traffic congestion on the highway network and/or the capacity and function of the transport network will be required to contribute and deliver appropriate transport infrastructure and/or effective mitigation measures.
4. Development proposals will be required to demonstrate, in accordance with TfL's latest Construction Logistics Plan Guidance and the Tower Hamlets Code of Construction Practice (CoCP), that any impacts on the transport network during the construction phase of the development will be managed and mitigated.
5. Development proposals will be required to demonstrate that proposals will not result in any detrimental impact on road safety.
6. Development proposals are required to support the delivery of, and safeguard land required for, future strategic transport schemes, as well as protect and enhance existing transport infrastructure. Development proposals that would prevent the delivery of future strategic transport schemes will not be supported.

Supporting text

19.39 This policy seeks to address the impact that development has (both individually and cumulatively) on the transport network, particularly issues of congestion, air quality, severance, safety, and accessibility for cyclists and pedestrians. It sets out how development proposals should assess the severity of impact it has on existing transport infrastructure and services, including the approach taken to mitigate any adverse impact on capacity, connectivity, and congestion.

19.40 Tower Hamlets has a high-density of strategic roads designed to carry high volumes of traffic through and within the borough, which has a severe impact on air quality, traffic congestion, and road danger.

19.41 Congestion levels in many parts of the borough are severe, and the interconnectedness of the highway network – whether local or strategic – plays a significant role in contributing to this congestion. A development's impact on congestion is not just a matter of building size but depends on its location, use, design, density, and operational factors (for instance, a relatively small development could be judged to have a severe impact if it generates a high number of vehicle trips and/or is in a sensitive location). Given the significant capacity constraints on the public transport and highway network, any development that generates a net-increase in vehicle trips has the potential to have a severe impact on the safety and operation of this network within Tower Hamlets.

19.42 Part 2 seeks to ensure applications provide an independent, objective, and accurate transport assessment or transport statement appropriate to the scale of development. A transport assessment or statement must be prepared in accordance with the latest guidance from Transport for London. The level of detail required will be dependent on the type and scale of the development. Applicants

should seek pre-application advice to determine whether a transport assessment or statement will be required. A transport assessment should be submitted with a draft construction management and logistics plan and a delivery and servicing plan.

19.43 A transport statement is a simpler document that identifies the likely transport impacts of a proposal and seeks to mitigate the negative transport impacts of development in order to promote sustainable development. A transport statement may be accompanied by a construction management and logistics plan or a delivery and servicing plan depending on the type of land use and its location; this should also be established and scoped out with our transport and development management teams at the pre-application stage.

19.44 Transport assessments and statements will be required to provide detailed information on the range of transport users and modes, including the movement of people and goods, both before and after a proposed development has been constructed. A transport assessment or statement should identify and address transport impacts on all modes of transport and set out the measures to avoid, remedy or mitigate identified impacts of the development.

19.45 Where transport assessments are required, they should be accompanied by an Active Travel Zone (ATZ) assessment. The ATZ should identify and assess key routes to major trip attractors, using latest TfL guidance. It should also consider evening/night-time use, and the safety of marginalised or vulnerable groups, including women, girls and gender diverse people, children and older people, and people with disabilities.

19.46 Applicants should submit a travel plan alongside the planning application, where appropriate. The requirement for a travel plan should

be agreed with relevant teams such as the council's highways team, school team and Transport for London (TfL) before an application is submitted. TfL provides guidance that sets out the requirements for travel plans. Such plans must promote and provide a long-term strategy to meet sustainable transport objectives. They should contain a package of measures that will seek to minimise the number of trips undertaken by private car (e.g. restricting car parking provision), encourage use of sustainable transport and generally reduce the need to travel to and from the development. Travel plans must set targets, objectives and provide detail on implementation, funding, and monitoring. This will be secured as a planning obligation for major development proposals and as a condition on minor development proposals.

19.49 Part 3 seeks to ensure that development does not exacerbate or overload transport networks through trips associated with its uses. Where appropriate, conditions and/or planning obligations will be sought to secure mitigation measures required to make a development acceptable. This is in addition to CIL contributions which fund transport infrastructure improvements on a borough-wide scale. All contributions towards new transport infrastructure improvements must be in accordance with Policy DV5 and the Planning Obligations SPD.

19.48 Areas in the borough anticipated to accommodate higher levels of the population and economic growth such as the Isle of Dogs and City Fringe are where existing highway and/or public transport demand is already close to or exceeding supply during peak travel times. Other areas of the borough also experience local highway or public transport stress during these times. Development that increases demand without appropriate mitigation (including infrastructure contributions to service improvements and/or delivering effective modal shift) will not be supported.

19.49 Part 4 requires development proposals to demonstrate that any impacts on the transport network during the construction phase of a development will be managed and mitigated. Traffic generated by construction and demolition of all scales is a significant contributor to poor air quality throughout the borough and can also significantly impact on the flow of traffic, road safety, and pedestrian convenience.

19.50 Applicants are required to provide a Construction Management Plan, including details of any demolition works, and a Traffic Management Plan, as per the Tower Hamlets CoCP. For major developments a Construction Logistics Plan is also required.

19.51 Part 5 seeks to support the Mayor of London's Vision Zero objectives. The aim of Vision Zero is to eliminate all deaths and serious injuries on London's transport system. Road safety is fundamental to the creation of healthy streets, where all users feel safe while walking, cycling, and using public transport.

London Plan policies:

- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts

Local Plan policies:

- DV4 Planning and construction of a new development
- CG9 Air quality

Evidence base:

- Mayor's Transport Strategy, 2022
- Strategic Transport Assessment, 2016
- Tower Hamlets Transport Strategy, 2019-2041
- LBTH Code of Construction Practice, 2023

Policy MC4 Parking and permit-free

1. Development proposals must prioritise sustainable approaches to parking in areas that have, or will have good public transport accessibility, in order to support the delivery of healthy, safe, liveable neighbourhoods, and consider the needs of the wider community.
 - a. In line with the London Plan, car-free development should be the starting point for all development proposals;
 - b. for areas with a PTAL rating between 1-3, residential developments have regard for the maximum car parking standards set out in the London Plan;
 - c. residential car parking will not be supported in the borough's Opportunity Areas, the Central Activity Zones (CAZ), Metropolitan and Major town centres, and any areas with a PTAL rating of 4 and above, except from providing required Blue Badge parking spaces for disabled people in accordance with London Plan Policy T6.1;
 - d. disabled parking spaces in residential developments must be reserved for use by Blue Badge holders who are occupiers of wheelchair accessible homes within the development. Disabled parking spaces must not be sold or leased to other residents;
 - e. residential development is required to be permit-free in terms of on-street car-parking, with any parking associated with a development to be located off-street;
 - f. designated parking spaces for car clubs will only be supported where it can be demonstrated that car club use would reduce the overall car-use of the development and there are active charging facilities;
 - g. development proposals for specialist and supported housing should provide short stay parking bays which must be restricted to support and care services needed by residents; and
 - h. car parking for commercial or industrial uses will only be permitted where it has been demonstrated to the council to be essential to the operational requirements of the business of service, and must be the lowest justified quantity. Car parking for staff will not be permitted.
2. All new or re-provided parking spaces (in residential and non-residential development) should be equipped with active electric vehicle charging facilities.
 - a. When located on pavements, electric vehicle (EV) charging points should be integrated into the streetscape design and should not obstruct pedestrian movement. Where practicable, installation of EV charging points in the carriageway is preferred.
3. All new development proposals must deliver high-quality cycle parking in line with the London Plan and the London Cycling Design Standards. Developments will be required to ensure:
 - a. cycle parking is well-located, safe, secure, and accessible, and provide a balance of short-stay and long-stay provision;
 - b. cycle parking and storage caters to all types of cycles, including bicycles, adapted cycles, e-bikes, and cargo bikes, and;
 - c. complementary facilities to support cycle use are provided where appropriate, including accessible showering and changing facilities, storage lockers, and basic maintenance equipment such as bike pumps.
4. Where suitable, developments should provide or contribute towards new or expanded publicly accessible shared cycle hire facilities.

Supporting text

19.52 This policy seeks to ensure that new developments adopt a sustainable approach to managing parking, to prioritise land uses such as housing, facilitate sustainable travel patterns, address congestion and poor air quality, and respond to the needs of the community.

19.53 Car parking takes up large amounts of space and can reduce the area available for development, can put pressure on the public realm that otherwise could benefit all residents by providing increased space for outside amenity space, parks, and urban greening. Where parking is provided in basement accommodation, this can add to the cost of a development and impact the viability of a scheme. However, it is noted that the use of cars can support community members who rely on their vehicle for work, mobility, or other important and necessary reasons.

19.54 Part 1(a) sets out that a car-free approach is required in areas of Tower Hamlets where there are good levels of existing or planned public transport accessibility and where there is significant residential growth expected in the coming years. Furthermore, in line with the London Plan, all development proposals within the borough's Opportunity Areas, CAZ, Metropolitan and Major town centres must be car free. Where there are high levels of public transport accessibility, alternative modes of transport will be promoted.

19.55 When applying the residential parking standards from the London Plan, development proposals should consider future changes to public transport accessibility levels (PTAL) as a result of new infrastructure provision, particularly in areas of low public transport accessibility (PTAL 1 and 2).



19.56 Part 1 (b) recognises that in areas of low public transport accessibility, some residents, businesses, and organisations rely on private vehicle use as their only transport option, to provide care to family members, or as a primary source of income. If car parking is deemed essential, it must be justified in the transport assessment and provided entirely on-site. Likewise, if parking can be considered essential for certain commercial or industrial uses, the amount provided must be of the lowest possible quantity.

19.57 Parking may be required for those with rely on private vehicles for

mobility, accessibility, or wheelchair needs. Part 1(d) requires accessible parking bay provision to be provided even in developments which are otherwise car-free, with minimum numbers provided in accordance with London Plan policy T1.6.1- T6.5. This parking must be safeguarded for use by Blue Badge holders, and cannot be leased or sold to other residents.

19.58 Part 1 (e) sets out that all residential development parking must be permit-free, and any parking required must be provided on-site and off-street. This will be secured by planning obligation. The required accessible parking spaces are exempted from this requirement.

19.59 Demand for on-street parking can create a significant amount of stress across the borough's street network. This demand has also increased significantly in recent years due to population growth. In addition, the issue of on-street parking outside of controlled hours (usually overnight and at weekends) often overcrowds streets, resulting in unacceptable safety and accessibility issues for vulnerable road users; as well as restricting traffic flows, delaying busses, and increasing journey times.

19.60 Part 1 (f) sets out that in some instances, car clubs can be cheaper alternatives to individual car ownership and allow for occasional car use while also discouraging shorter car journeys. However, car clubs can encourage car usage over more sustainable transport modes and share many of the negative impacts of private car ownership. Designated parking spaces for car clubs will only be supported where it can be demonstrated that car club use would reduce the overall car-use of the development. Spaces allocated for car clubs are included in the overall maximum allowance of permitted car-parking spaces. Any car club spaces should have active charging facilities.

19.61 Part 1 (g) recognises that in some instances, short-term parking for specific uses, such as specialist and supported housing, are essential for the function or operational requirements of the development. Where on-street drop-off or other essential parking is proposed, the need for specific parking spaces must be demonstrated.

19.62 A Parking Design and Management Plan that outlines how parking will be designed, managed, and enforced must be submitted with all applications that include car parking provision, in line with Transport for London Guidance.

19.63 Part 2 requires all parking spaces provided as part of a new development should be fitted with electric vehicle (EV) charging points. This goes significantly beyond the London Plan requirement of at least 20% parking spaces to have electric charging, with passive provision (the infrastructure capacity to install electric charge points at a later date) serving the remaining spaces.

19.64 However, taking into consideration the UK Government's commitments to end the sale of new combustion engine vehicles by 2030, it is justified to maximise the provision of electric vehicle charge points to have necessary infrastructure in place to support the transition to low-emissions vehicle use over the next decade. As per the Tower Hamlets Electric Vehicle Delivery Plan (2021-2025) accelerating the switch to electric vehicles will require potential users to feel confident that there is an adequate number of charging points and that are conveniently located to meet their needs. Passive provision is not considered appropriate, as there is no longer a question of if or when the demand for EV charge points will increase. Responsibility for installing them should be taken on now, to avoid dispute in the future over who has responsibility for upgrading all car parking spaces in development.

19.65 As per London Plan Policy T6, EV charging points should be integrated into the streetscape design and should not obstruct pedestrian movement. Where practicable, installation of EV charging points in the carriageway is preferred.

19.66 Part 3 requires all new developments to deliver high-quality cycle parking in line with the London Plan and London Cycling Design Standards. Around 80% of Tower Hamlets residents live in flats, and much of this accommodation has extremely limited cycle parking, cycle storage or cycle hire docking space. A lack of appropriate cycle parking and storage facilities is often cited as a barrier to cycle use and ownership. Applicants and developers to the detailed parking standards for vehicles and bicycles in. A sufficient amount of cycle parking should be provided to accommodate current demand and to encourage further use over time. Design of cycle parking has been extensively covered in the Transport for London's Cycle Design Standards and developers are required to take account of this when designing cycle facilities. Development proposals are required to provide cycle parking at least in accordance with the minimum standards as set out in Table 10.2 in the London Plan.

19.67 However, even in instances where cycle storage is currently provided, these facilities are not well-used: in a residents' survey undertaken for the Tower Hamlets High Density Living SPD, 76% of respondents reported never having used cycle storage in their building, and a further 26% of residents who own a bicycle responded that they stored it within their home, instead of the communal storage. This was largely attributed to accessibility of bike storage and perceptions of safety.

19.68 Both long- and short-term cycle parking provision must be

designed to the highest standard, taking into consideration the needs of all users, to help encourage the take-up of cycling in the borough. Providing cycle parking must not be seen as a tick-box exercise to provide required quantity at the expense of quality; for example, while stacked two-tier cycle racks can provide a large amount of storage in a limited space, they are only suitable for standard two-wheel bikes and can require significant upper-body strength to use. Consideration should also be given to a variety of users and mobility options, such as space for non-standard cycles, mobility scooters, and cargo bikes.

19.69 To increase cycle uptake by offering greater flexibility for residents, minimum cycle storage requirements should be provided in different locations. Preferably cycle storage should be located in the vicinity of a more active usage, such as the street or lobby. Indoor cycle storage should be fully accessible for all users, have step-free access via a ramp or direct lift, with suitably wide automated doorways to accommodate all types of cycle.

19.70 Furthermore, short-term cycle parking in key delivery destinations should include provision for accessible cargo-bikes, e-bikes, and e-mopeds (with charging facilities) to support the growth of cycle and last-mile logistics operations.

19.71 Part 4 requires developments to provide, or financially contribute to, publicly accessible cycle hire facilities as part of the development, where suitable. To increase access to cycling in the borough, the council is working closely with the Mayor of London and Transport for London to extend the existing Santander Cycle Hire scheme with new docking stations in appropriate locations. Where appropriate, development will be expected to safeguard land within the site where Transport for London has identified a need to accommodate publicly accessible

shared cycle hire stations. In addition, dockless cycle hire schemes run by private operators are becoming increasingly popular within the borough. The provision of cycle hire schemes should be managed to ensure that docking stations and cycles do not result in a cluttered public realm, which would adversely impact safety, accessibility of pedestrian movement.

19.72 To support increased cycle use and particularly cycling to work, new office developments should include complementary cycling amenities where appropriate, such as accessible showers, changing rooms, and storage lockers.

19.73 This policy should be read in conjunction with Policy MC5 and London Plan Policy T6 to ensure that along with on-site parking provision, development provides adequate delivery and servicing facilities within the site as well as encouraging shared servicing arrangements and timing of deliveries.

London Plan policies:

- T5 Cycling
- T6 Car parking

Local Plan policies:

- DV7 Utilities and digital connectivity
- CG9 Air quality

Evidence base:

- Mayor's Transport Strategy
- Cycle parking implementation plan, 2019
- Strategic Transport Assessment, 2016
- Tower Hamlets Transport Strategy, 2019-2041
- Tower Hamlets electric vehicle delivery plan: 2021-2025
- East of the Borough Transport Study, 2020
- Tower Hamlets High Density Living SPD
- Tower Hamlets Sustainable Freight, Servicing, and Delivery (2024)

Policy MC5 Sustainable delivery, servicing, and construction

1. New development proposals should facilitate sustainable freight through water, rail, and road. They should also encourage safe, low emission and efficient delivery and servicing, particularly through 'last-mile distribution' and active travel. Delivery and servicing requirements should be considered at the early stages of the design-led approach, with sufficient space allocated off-street and integrated within the site boundary to accommodate growth and future demand.
2. New development proposals should use zero emissions vehicles for servicing wherever possible and consolidated deliveries are expected to be of this type. Servicing by cycle and other non-motor vehicular modes should be used wherever possible. Any loading bay required for a development should be supplied with an electric vehicle rapid charge point to allow zero emissions vehicles to operate from the bay.
3. Development proposals that generate a significant number of vehicle trips for goods or materials during its construction and/or operational phases are required to submit a Construction Logistics Plan and/ or Delivery and Servicing Plan as part of the transport assessment. This should demonstrate how:
 - a. impact to the transport network and amenity will be avoided, remedied or mitigated;
 - b. delivery of goods and servicing will be provided within the site to encourage shared arrangements and timing of deliveries;
 - c. movement by water and/or rail and the use of low emission vehicles, electric vehicles, bicycles and freight consolidation facilities have been prioritised;

- d. where possible, development will use existing consolidation and distribution facilities to minimise the number of trips required to service the site, and smart or joint procurement measures will be considered to reduce the numbers of deliveries and servicing trips as should the use of micro-consolidation centres; and
 - e. new micro-consolidation centres will be provided within developments where appropriate.
4. Development proposals adjacent to safeguarded wharves, rail depots and bus depots are required to ensure they do not compromise their operation in line with the 'Agent of Change' principle.
5. Development proposals that provide new or improved wharves or other facilities for freight transfer between road, rail or water will be supported where they:
 - a. minimise impacts on the environment and neighbouring amenities;
 - b. support modal shift; and
 - c. facilitate the use of zero or low emissions vehicles.

Supporting text

19.74 Deliveries and servicing are essential to the economic growth of the borough. In recent years, we have seen a surge in demand for e-commerce and home delivery services, which combined with continued population growth, is driving an increase in vehicle trips across London. Fuelled in part by changing behaviours during the COVID-19 pandemic, customer expectations have also changed, with deliveries expected to be fulfilled in a matter of hours, rather than days or weeks. Typical freight and delivery vehicles are some of the most polluting vehicles on our roads. Increased delivery demand is contributing to increased traffic congestion, air pollution, and could result in obstructions to local and strategic roads while loading and unloading of goods takes place, which could impact bus journey times and access for emergency service vehicles. Furthermore, the projected growth and development in the borough will increase the demand for building materials, which, if not carefully managed, which result in increased construction traffic, air pollution, noise, and dust.

19.75 This policy seeks to address the challenges the borough faces in ensuring the efficient, safe, timely and sustainable movement of goods and materials across the borough, while also seeking to improve air quality and reduce impacts arising from the freight network such as accidents, spillages, or wastes.

19.76 As the proportion of cyclists and pedestrians has increased, pedestrian and cycle safety has become an area of increasing concern in Tower Hamlets, particularly given the rise in fatalities on busy arterial roads. Across London, nearly two-thirds of cyclist deaths and around a quarter of pedestrian deaths involve a heavy goods vehicle. This policy seeks to reduce the impact of delivery, servicing, and construction traffic



on the environment and the health and well-being of residents in terms of noise disturbance and its contribution to road congestion and air pollution.

19.77 Part 1 seeks to support the aims of the Tower Hamlets Transport Strategy (2019-2041) to maximise the use sustainable transport methods for freight, making use of the rivers and waterways where practicable for business cargo and freight delivery.

19.78 Part 2 seeks to encourage the use of zero emissions vehicles wherever possible for deliveries. This includes deliveries by cycle,

cargo-bike, and other non-motor vehicles. Loading bay requirements for developments should be supplied with EV rapid charge points to allow for zero emissions vehicles to operate and recharge on delivery routes.

19.79 Part 3 ensures that development generating a significant number of vehicle trips for goods or materials will be assessed in relation to its likely impact on the transport network, with reference to the most up-to-date Transport for London guidance relating to deliveries, servicing, and construction logistics. An assessment will also be required where a development has the potential to have a significant impact on the transport network. The level of assessment required will be decided through the development management process.

19.80 Development proposals will need to plan and manage its freight movements through the construction and operational phases of the development. Construction management plans and/or delivery and servicing plans are required to show how the Construction Logistics and Community Safety (CLOCS) standard has been incorporated and that fleets serving the site have Fleet Operator Recognition Scheme (FORS) silver accreditation. In addition, development will need to provide sufficient space for deliveries and servicing within the site curtilage and off the public highway, including refuse collection.

19.81 Development proposals must seek to prioritise sustainable methods in the movement of goods and services, particularly sites with significantly greater delivery and servicing frequencies and sizes. Construction can make significant environmental and cost savings through more sustainable methods of recycling existing materials; this can significantly reduce freight movements by vehicles such as tipper trucks which tend to be more polluting and more hazardous to cyclists compared to other vehicles.

19.82 Part 3 (b) seeks to ensure that the delivery of goods and servicing will not take place on-street wherever possible, to avoid negative impacts on highway safety and traffic flow. In addition, off-peak deliveries and servicing operations should be considered where appropriate to reduce motor traffic and road danger, minimising the impact of servicing at the busiest times, particularly in areas of high footfall. In these cases, quiet delivery agreements should be considered.

19.83 Part 3(d) requires development to minimise the number of daily vehicle trips to and from the site. by consolidating and coordinating deliveries and servicing. Residential development will require bespoke management and delivery accommodation when compared to commercial development. The rapid acceleration of internet shopping has resulted in a significant growth of smaller light goods vehicles, which increase congestion and pollution at peak times as well as traditionally quieter times. Delivery vehicles to residential addresses often park on the highway causing traffic flow and safety concerns. This disruption increases with missed deliveries whereby the same address receives a second or third delivery attempt. Development should provide space for these deliveries and help ensure all such deliveries are completed on the first attempt.

19.84 The Tower Hamlets Sustainable Freight Study (2023) concluded that the use of a construction consolidation centre can help reduce and control the number of deliveries to site by up to 50%. Holding areas located on nearby vacant sites can be used to control the number of construction deliveries and vehicles dwell times.

19.85 Parts 4 and 5 requires developments adjacent to safeguarded wharves to recognise the role of wharves and depots, and ensure that their continued function is not negatively impacted. The borough's river and rail network represent an underused resource and priority should

be given to utilising the railways, rivers, and canals to facilitate the movement of waste and goods, particularly the safeguarded wharves such as Northumberland Wharf and Orchard Wharf.

London Plan policies:

- S115 Water transport
- T7 Deliveries, servicing and construction

Local Plan policies:

- Policy DV4 Planning and construction of new development
- Policy CG9 Air quality
- Policy CG10 Noise and vibration

Evidence base:

- Mayor's Transport Strategy
- Mayor of London's Freight and Servicing Action Plan, 2019
- Mayor of London's Vision Zero Action Plan, 2018
- Construction Logistics Plans Guidance, 2021
- Delivery and Servicing Plans Guidance, 2020
- Tower Hamlets Transport Strategy, 2019
- Tower Hamlets 'Code of Construction Practice (CoCP), 2023
- Tower Hamlets Sustainable Freight, Servicing, and Delivery (2024)

20. Reuse, recycling and waste



RW1 – Managing our waste

RW2 – New and enhanced waste facilities

RW3 – Waste collection facilities in new development

Introduction

20.1 The management of waste is one of the most challenging issues facing Tower Hamlets. To address this the Council has brought the collection and management of household waste under its direct control, declared a waste emergency and developed a detailed management strategy for local authority collected waste. The borough will continue to have significant population and development growth in the coming decades and this is expected to give rise to a growing quantity of waste to be managed, from homes, businesses and construction work. The Council wants to ensure that as much of this waste as possible is, reused, recycled, and has value extracted from it while facilitating a shift towards a circular economy where the quantity of waste produced falls.

20.2 As a unitary authority Tower Hamlets performs the roles of waste planning authority, waste collection authority, and waste disposal authority in the borough. In our capacity as a waste planning authority, we have a statutory duty to prepare a waste local plan in line with legislation. This is being fulfilled through the inclusion of waste policies in this Local Plan. A key purpose of these policies is to ensure waste produced in the borough is properly managed through

access to suitable management facilities. These policies have been prepared within the context of the requirements of the London Plan, with particular focus on the requirement to provide for quantities of household and commercial and industrial waste apportioned and the management targets set.

20.3 The management of waste rarely respects administrative boundaries and hence waste is considered to be a strategic cross-boundary issue and is subject to the duty to co-operate³⁵. In the interests of proper planning and sustainable development Tower Hamlets, through the duty co-operate mechanism, will seek to secure access to sufficient waste management capacity to meet the borough's apportionments as set out in the London Plan and ensures construction, demolition and excavation waste is also properly managed. We will support the transition to the circular economy through the establishment of Material Hubs. Material Hubs can be used to store otherwise unused material which can be reused, repaired, or repurposed within or outside the borough. It is expected that Materials Hubs will be initially trialled in the early part of the plan period and scale up in the medium to long term reducing the quantity of construction and demolition waste requiring management in particular.

20.4 The LLDC is currently the planning authority for part of the borough of Tower Hamlets, but it does not have a separate apportionment. The Council is therefore planning for waste across its whole administrative area. We will continue to work closely with the LLDC on delivering our strategic plan for waste.

20.5 Our duties as a waste collection authority and waste disposal authority include helping households to prevent waste as well as reuse items and recycle as much waste as possible. The London Plan sets a

³⁵ Tower Hamlets Waste Data Update – Identification of Strategically Significant Cross Boundary Waste Movements BPP Consulting June 2024

target of recycling 65% of municipal waste by 2030 and zero biodegradable waste to landfill by 2026. However, in 2021/2022, only 20% of household waste was reused, recycled, or composted in Tower Hamlets and it is recognised this needs to increase for those targets to be met.

20.6 Whilst London boroughs have not been set individual targets, Tower Hamlets is working towards meeting the London-wide target. The design of new development is required to ensure integrated waste collection and bulking systems are included which contribute to the borough's ability to implement the waste hierarchy and increase recycling/ composting rates (see Policy RW/3).

20.7 The Local Plan must identify sufficient opportunities to meet the identified needs of an area for the management of waste, aiming to drive waste management up the Tower Hamlet's waste hierarchy (see Figure 22). The Council is required to plan for seven waste streams, including household, business, and construction waste. The London Plan 2021 requires boroughs to provide sufficient capacity to manage the tonnages of household and commercial/industrial waste apportioned in the London Plan 2021. The intention is for London to be net self-sufficient in managing all waste, other than excavation waste, by 2030.

20.8 The following tonnages of waste are predicted to arise from Tower Hamlets over the Plan period:

Table 13: Tower Hamlets' waste capacity need 2026-2041 (tonnes)³⁶

Waste stream	2026	2031	2036	2041
Apportionment (LACW and C&I)	197,000	199,000	203,000	207,000
Non hazardous C,D&E waste	286,000- 303,260	286,000- 323,290	286,000- 329,000	286,000- 337,2000
Hazardous waste included in LACW, C&I apportionment. Overall arising predicted to be c16,200 tpa ³⁷				
All other waste streams	0	0	0	0

20.9 Providing for the predicted arisings within the constraints of the borough presents a particular challenge because parts of the borough are densely built-up and there are competing pressures from higher value land uses such as meeting housing and employment land needs.

³⁶ Derived from Table 9.1 of the London Plan 2021

³⁷ Tower Hamlets Waste Data Update – Management requirements for Hazardous Waste in Tower Hamlets to 2042 BPP Consulting June 2024

20.10 The London Plan also has a target of 95% reuse/recycling/recovery of Construction and Demolition waste and 95% beneficial use of excavation waste overall and 100% of inert excavation³⁸. The available evidence indicates that Tower Hamlets is likely to be meeting these targets although the data is not definitive.³⁹

20.11 Tower Hamlets is also required to plan for hazardous waste, wastewater, agricultural waste, and low-level radioactive waste. The evidence concludes that no additional facilities are required within the borough for these waste streams because they are only produced in very small quantities and/or they are managed at specialist facilities outside the borough.⁴⁰

20.12 Capacity offered by existing waste sites in the borough has been assessed to be insufficient to meet the management needs for C&D waste arisings in particular. It is estimated that an area of approximately 0.65 to 1 hectare would be required to provide sufficient capacity to manage this waste⁴¹.

20.13 To continue to provide for the London Plan apportionments for household and business waste, Tower Hamlets will safeguard existing waste sites, identify suitable land where facilities offering additional capacity may be located under Policy RW1 and work with the GLA and other boroughs to secure access to suitable capacity elsewhere in



London. Policy RW2 will guide the development, delivery and operation of facilities offering additional waste management capacity within the Borough.

³⁸ London Plan Footnote 164.

³⁹ Tower Hamlets Waste Data Update – Management requirements for Construction, Demolition and Excavation Waste in Tower Hamlets to 2042 BPP Consulting June 2024

⁴⁰ Tower Hamlets Waste Data Study 2023 Vitaka

⁴¹ Tower Hamlets Waste Data Update – Management requirements for Construction, Demolition and Excavation Waste in Tower Hamlets to 2042 BPP Consulting June 2024

20.14 Policy CG5 – Retrofit and the Circular Economy will ensure that construction and demolition waste continues to be utilised as a resource in the construction and regeneration of new development in the borough and London. The Council will explore opportunities to take waste management in house or work in partnership in order to maximise the extraction of resources and financial returns from the waste the borough generates.

20.15 The borough is not allocating individual sites for waste but instead identifying areas of search within which individual sites could come forward; this approach is supported by both national policy and the waste industry. The total amount of suitable industrial land in the borough is just under 22 hectares. It has been calculated that up to 5.28 hectares of land could come forward within the areas of search for new waste management sites (see Policy RW1) through business turnover and vacancies⁴². The assessment of existing waste management capacity evidences that the safeguarded existing waste sites along with the areas of search should be sufficient to serve the Borough’s projected waste management needs⁴³.

20.16 The Council will continue to monitor arisings of waste, the availability of land capable of providing additional waste capacity within the Borough and the continued availability of suitable capacity elsewhere in London over the course of the Local Plan period.

⁴² See Appendix 2 of Tower Hamlets Waste Data Update – Management Requirements for Construction, Demolition & Excavation Waste in Tower Hamlets to 2042 for examples.

⁴³ Tower Hamlets Waste Data Update – Management Requirements for Construction, Demolition & Excavation Waste in Tower Hamlets to 2042 + Management Requirements for Apportioned HIC Waste in Tower Hamlets to 2041 BPP Consulting June 2024

⁴⁴ Tower Hamlets Waste Data Update – Management Requirements for Apportioned HIC Waste in Tower Hamlets to 2041 BPP Consulting June 2024

Capacity Assessment

20.17 The figures below set out the findings of an assessment of the potential capacity of existing waste management facilities provided in Tower Hamlets.

Table 14: Capacity Assessment of Existing facilities managing apportioned waste in Tower Hamlets (tonnes per annum⁴⁴)

Capacity source	LACW/C&I management capacity
Existing licensed waste sites	160,000tpa
Exempt waste sites	40,000tpa
Onsite segregation facilities	17,600tpa
Total assessed capacity	217,600tpa
Total potential capacity	217,600tpa

20.18 When the value of c220,000 tpa is compared with the apportioned tonnages presented in Table 14 above, it shows that the assessed capacity ought to be sufficient to meet the apportionment requirement. However given the identified shortfall in capacity for the management of construction and demolition waste predicted to arise in the borough over the Plan period, it is still considered appropriate to identify areas of search where facilities offering additional waste management capacity may be developed, on a precautionary basis.

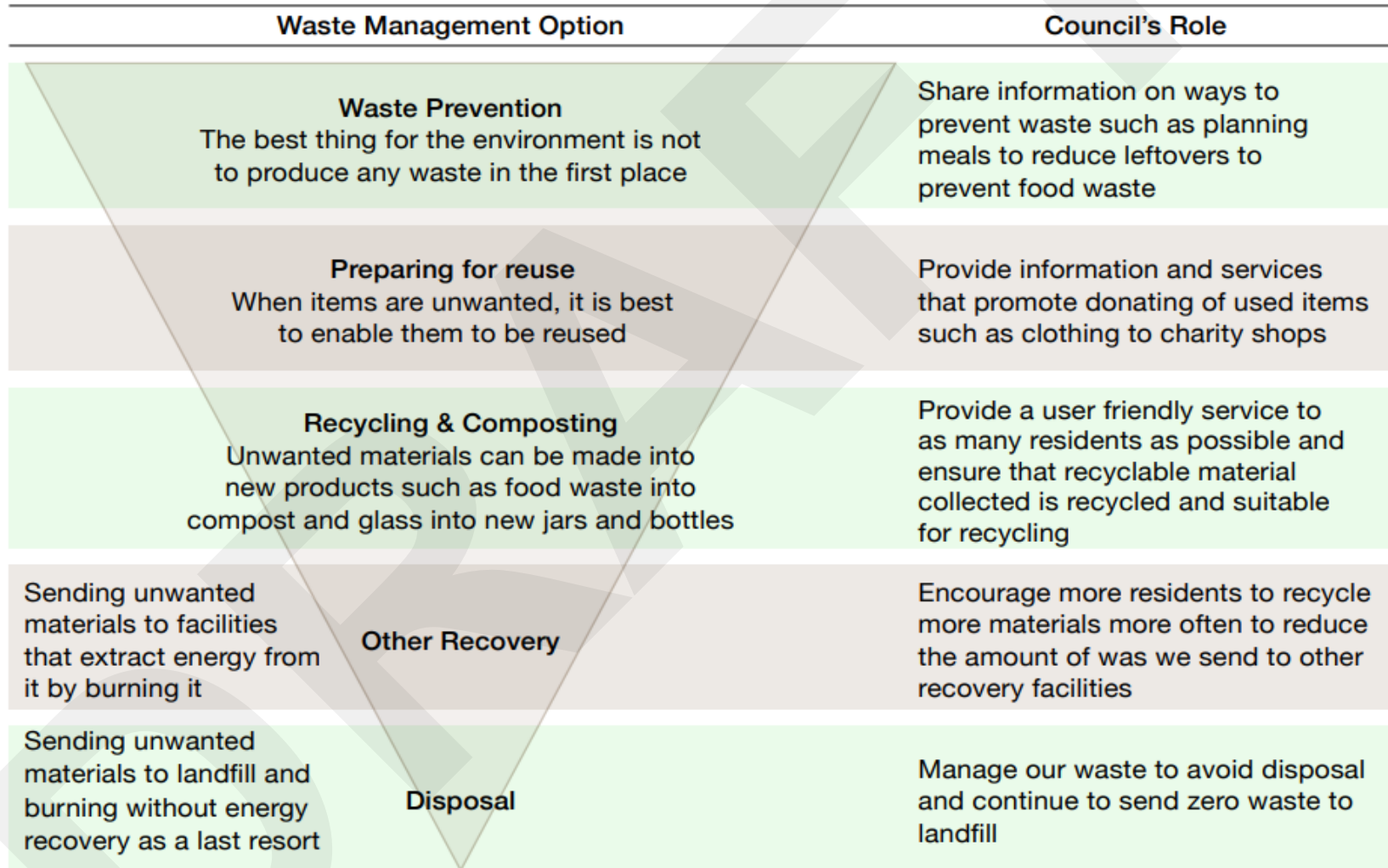
20.19 Areas listed in policy RW1 Managing our waste are considered to be suitable in principle to accommodate new waste management facilities. This is primarily due to their industrial nature and access to the strategic transport network so that waste and vehicle movements can avoid local roads and protect the safety and amenity of residents and heritage assets. Areas of search are not exclusively designated for waste management purposes as they are also considered to be suitable, in principle, for other uses that are considered appropriate for their respective policy designations.

20.20 Any proposals for new or extended waste management facilities in Tower Hamlets will be assessed against criteria in the National Planning Policy for Waste, the London Plan and Local Plan policies. The Council is actively exploring opportunities for the development of further waste management facilities to manage the Borough's waste through its waste management strategy.

20.21 The construction of new, extended or replacement of existing waste management facilities must include, where possible, technologies that seek to extract as much material and value as possible through the repurposing, recycling, storage, and management of waste. Where opportunities arise for synergies or partnerships with delivery of the Council's waste management services these will be explored.

20.22 The London Plan is seeking to move towards a future where goods are designed to be reused and recycled and very little waste will require disposal in the future (a 'circular economy'). Tower Hamlets will contribute to this approach in various ways (e.g. new developments will be required to recycle and reuse construction materials – see Policy RW1).

Figure 22: Waste Hierarchy Diagram



Policy RW1 Managing our waste

1. The following existing waste sites within Tower Hamlets (as shown on the Policies Map) are safeguarded for waste use over the plan period.

Table 15: Schedule 1: Existing waste sites in Tower Hamlets

Reference	Name/Location	Other designation(s)	Site area (hectares)	Operational capacity/ contribution to apportionment (tonnes per year)
1	Northumberland Wharf, Yabsley Street	Safeguarded Wharf	0.88	160,000
2	Ailsa Street		0.53	0/23,850 – 34,450

2. The following is the existing waste site in the London Legacy Development Corporation area (LLDC) and is subject to Planning Policies in the LLDC Local Plan.

Table 16: Schedule 2: Existing waste site in LLDC

Reference	Name/Location	Other designation(s)	Site area (hectares)	Operational capacity/ 5 yr peak(tonnes per year)
3	455 Wick Lane	LLDC Local Plan: Strategic Industrial Location and Preferred Industrial Location	0.47 (0.027 currently used for waste purposes ancillary to civil engineering works)	64,610

3. Development proposals which seek to maximise the efficiency and/or enhance the capacity of existing waste facilities in the borough will be supported.

4. Applications for non-waste uses on safeguarded sites or the reprovision of existing waste management facilities will only be permitted where it is clearly demonstrated and ensured through a legal agreement that compensatory capacity at least equivalent to, the maximum annual throughput that the existing site can achieve will be delivered on a suitable replacement site within the borough in the first instance or another part of London which provides.

5. Development proposals that prevent or prejudice the continued availability of capacity of these sites will only be supported where alternative capacity provision is made.
6. Areas in Schedules 3 and 4 are considered suitable for new waste management facilities (as shown on the Policies Map).

Table 17: Schedule 3: Areas of search for new waste sites in Tower Hamlets

Reference	Name/Location	Other designation(s)	Waste facility type	Site area (hectares)	Assessed potential capacity contribution (tonnes per year)
4	The Highway	Local Industrial Location	Reuse/ refurbishment/ repair	2.7 (of which an estimated 0.65 to become available over the plan period)	Up to 32,500
5	Empson Street	Strategic Industrial Location	Recycling, composting or recovery	10.07 (of which an estimated 2.42 to become available over the plan period)	Up to 121,000

Table 18: Schedule 4: Areas of search for new waste sites in LLDC

Reference	Name/Location	Other designation(s)	Waste facility type	Site area (hectares)	Assessed potential capacity (tonnes per year)
6	Fish Island	LLDC Local Plan: Strategic Industrial Location	Recycling, composting, recovery	9.21 (of which an estimated 2.21 to become available over the plan period)	Up to 110,500

7. Small-scale waste management facilities integrated within new developments outside of the Areas of Search listed in Schedules 3-4 may be acceptable where they contribute to managing apportioned waste and are of a scale and nature that does not compromise adjacent existing and proposed land uses.
8. New development will be expected to reuse and recycle construction, demolition, and excavation waste on or close to the site where it arises.
9. Development proposals in the vicinity of existing, safeguarded or consented waste management facilities must consider the agent of change principle to ensure the proposed use and operations do not constrain the assessed potential.

Supporting text

20.23 This policy seeks to support the development of a well-planned and integrated network of waste management facilities that provides for identified future capacity needs and contributes towards managing waste generated within the borough (and beyond) over the plan period.

20.24 Meeting this need will require the management of waste arising from new development to be provided for, retention of existing waste management facilities (operational and non-operational), and provision of additional facilities in identified Areas of Search and other suitable locations which comply with the criteria set out in Policy RW2 (and the development management criteria contained in this Local Plan). Proposals for waste management facilities within the Areas of Search will be guided towards locations within these areas so they are located as far away as possible from sensitive receptors (such as residential uses, schools, nurseries, and healthcare facilities) and mitigation measures are provided to ensure any significant detrimental environmental and amenity impacts are adequately addressed. Where existing facilities can be enhanced to maximise their use, subject to the requirements of Policy RW2, this will be encouraged.

20.25 The LLDC is the planning authority until December 2024 for those sites and areas of search within its boundary (as shown in Schedules 2 and 4). The LLDC Local Plan (2020-2036) safeguards existing waste sites (listed in Schedule 2) and identifies areas of employment land suitable for waste uses (listed in Schedule 4). To secure the delivery of an effective waste plan for the borough as a whole Tower Hamlets and the LLDC agree that the Area of Search listed in Schedule 4 is potentially suitable for waste management use. Acceptability of proposals for waste management uses in this location will be determined with reference

to policies within the LLDC Local Plan 2020 and any other relevant material considerations that apply to that proposal. Until December 2024 applications for planning permission in these locations will be determined by the LLDC.

20.26 The existing safeguarded waste site of Ailsa Street is within an area of regeneration and may be released for other uses, providing the requirements set out within Policy RW1 (see Part 4) are met.

20.27 Compensatory capacity will be sought which is at least equivalent to the maximum annual throughput over the last five years, where reported through the Environment Agency's Waste Data Interrogator. Compensatory provision should be provided locally within Tower Hamlets in the first instance, or failing that, elsewhere in London. Compensatory provision will be secured through conditions requiring proof of commencement of operation and operational capacity and a legal agreement at the planning permission stage.

20.28 Competition for land means the borough must look beyond traditional industrial locations when seeking space for facilities to manage its waste. There is an opportunity for innovative technologies to be incorporated into new development to manage waste generated over its lifetime. Part 7 of the policy therefore allows modern waste facilities to be integrated within new development outside the areas of search. Small scale facilities which come forward will be assessed on a case-by-case basis against criteria in Policy RW2 and regional and national policy.

20.29 On-site materials processing systems for food are an important aspect to consider in this borough due to the particular challenges to collection services within blocks of flats. The principle of these systems is two-fold:

- a. To carry out processing of materials at source, thereby reducing the tonnage and volume of solid waste to be managed and the subsequent burden on collection services; and
- b. To make use of valuable end products such as unlocking the energy held within the waste material itself.

20.30 There are a number of pieces of equipment, which may provide appropriate on-site waste processing including, but not limited to, micro digesters and composting units.

20.31 The flexibility of these systems is such that it reduces the need for separate collections of food waste to be carried out within the development and thereby reducing vehicle movements. Where such systems are proposed, it will be the responsibility of the managing agent to maintain the system/facility. An agreement will also need to be made with the Council with regards to securing the long-term availability of this capacity so it may be relied upon to contribute towards Tower Hamlets' apportionments prior to permission being granted.

20.32 Integrated waste collection systems are also required for new developments under Policy RW3. We will also consider the allocation of community infrastructure levy contributions towards provision of strategic waste management facilities located elsewhere in the borough.

20.33 For part 7 of the policy, developers should submit a plan for the management on-site waste to demonstrate how much construction, demolition and excavation waste will be reused and recycled, taking account of the London Plan target of 95%. The sustainable transportation of waste (by water and rail) will be assessed as part of Policy RW2, see Part 1(i).

20.34 All sites and areas of search listed under Policy RW1 are shown on the relevant policies maps for Tower Hamlets and the LLDC

London Plan policies:

- D13 Agent of Change
- SI7 Reducing waste and supporting the circular economy
- SI8 Waste capacity and net waste self-sufficiency
- SI9 Safeguarded waste sites

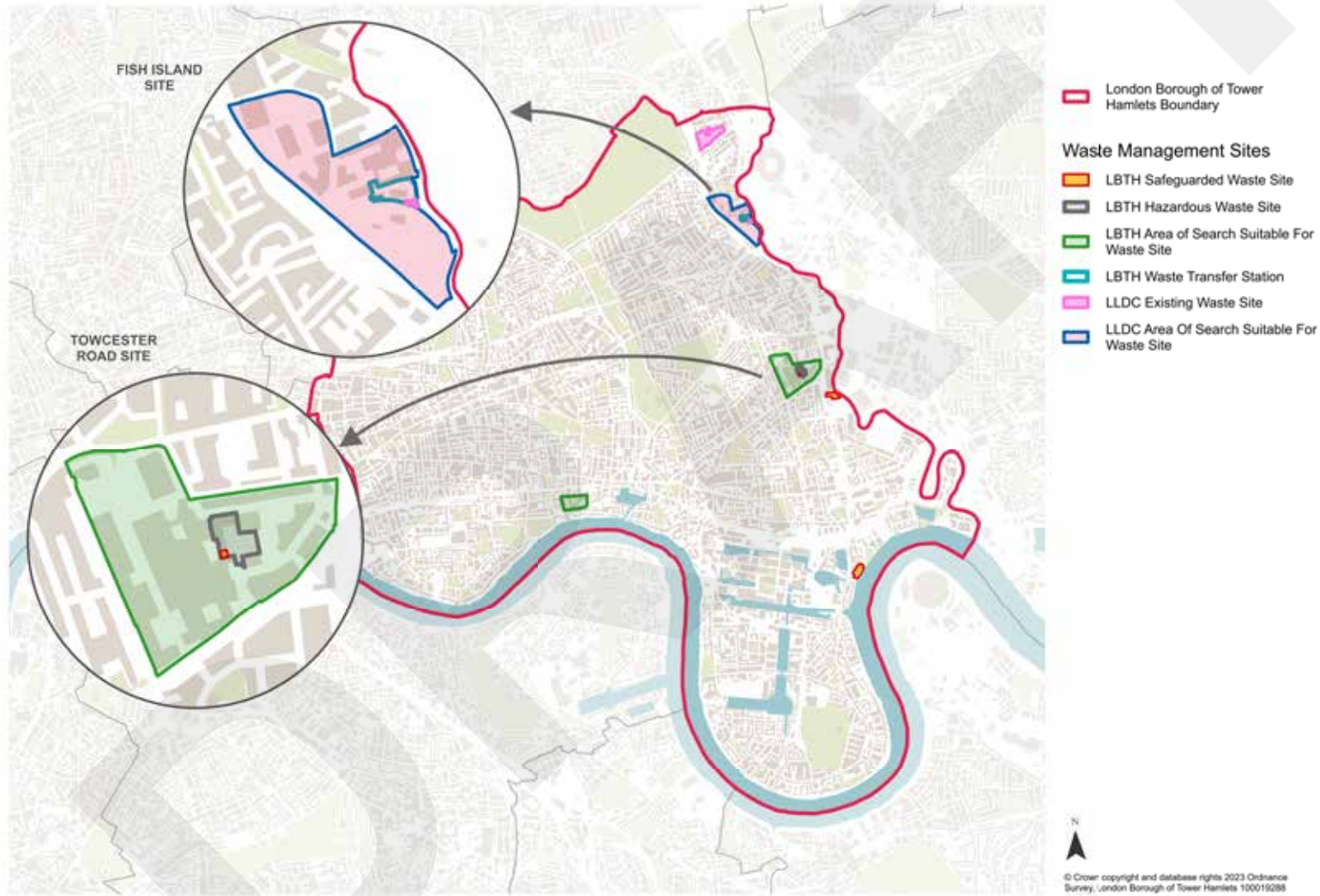
Local Plan policies:

- CG3 Low carbon energy and heating
- CG4 Embodied carbon, retrofit and the circular economy
- CG6 Managing flood risk
- CG7 Sustainable drainage
- CG9 Air Quality
- CG10 Noise and vibration

Evidence base:

- Tower Hamlets Waste Data Update 2024
- Tower Hamlets Waste Data Study, 2023
- Don't let our future go to waste, Waste Management Strategy, 2018-2030
- Reuse, Recycling and Waste SPD, 2020
- National Planning Policy for Waste, 2014

Figure 23: Waste sites map



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Policy RW2 New and enhanced waste facilities

1. Development proposals to construct new waste facilities or replace or extend existing waste facilities will be supported where:

- a. they are located on safeguarded waste sites or existing waste sites or strategic industrial land or local industrial locations;
- b. they observe the 'Proximity Principle', dealing with waste as close to its source as possible;
- c. there is good access to the strategic transport network and where feasible, they prioritise rail and water transport over use of the principal road network;
- d. infrastructure to facilitate any road based vehicle fleet's transition to Zero and Ultra Low Emission Vehicles is provided on site;
- e. they demonstrate that the waste will be managed in accordance with the application of the Waste Hierarchy in priority order and its contribution to the circular economy and, where possible, seek to achieve a positive carbon outcome in accordance with the requirements of the London Plan (2021) Policy SI 8;
- f. they incorporate high-quality design, are of a scale and nature which integrates into its surroundings and ensures compatibility with adjacent existing and proposed land uses (including within neighbouring boroughs);
- g. they minimise amenity impacts on surrounding areas in terms of noise, odour, air quality and impacts on the transport network, according with Agent of Change principles;

- h. there is co-location with other compatible uses (including existing waste facilities or fleet depots);
- i. they propose technology which is appropriate for the location and nature of the site;
- j. there is adequate road capacity to accommodate any vehicle movements generated and that vehicles can enter, wait, unload and leave the site without prejudicing the safety of pedestrians and other road users;
- k. it provides effective on-site measures to ensure safety and security;
- l. it is enclosed, unless it can be demonstrated that environmental and amenity impacts, including the emission of air pollutants, noise, vibration, dust, glare, vermin, odours can be mitigated, both during and after operations; and
- m. it incorporates measures to minimise carbon emissions and maximise the use of lower-carbon energy sources.

2. Developments that propose waste management facilities should include an appropriately detailed plan for the site during construction, operation and decommissioning.

Supporting text

20.35 This policy relates to the provision of new and enhanced waste management facilities (including those replacing, expanding, or intensifying existing sites as well as capacity on exempt sites) and seeks to direct them towards the most appropriate and sustainable locations which maximise the efficient use of the land and do not have any unacceptable impacts.

20.36 The policy seeks to incorporate flexibility into the assessment of new waste management uses, recognising the evolving nature of both waste management practices and national and regional policies that may result in a need for retrofit or the delivery of new waste management facilities in the borough.

20.37 New waste management facilities will be directed towards existing safeguarded sites and areas of search (as set out in Policy RW1). In other locations, such facilities will still be expected to meet the criteria set out in Policy RW2 as well as any other relevant policies within the plan. Windfall proposals for waste management facilities outwith existing sites, safeguarded sites or areas of search will be required to demonstrate why it is not feasible to do so within the areas identified in RW1.

20.38 Part 1 seeks to ensure that new developments are located close to the sources of waste they are intended to manage, operate to support the application of the waste hierarchy and the move towards a circular economy. Development proposals should be supported by documentation which sets out how the development will meet these requirements. Part 1 (a) seeks to ensure the protection existing and safeguarded sites and also those with exemptions.



20.39 Part 1 (b) and 1 (d) set out details regarding management of waste in line with the proximity principle, within Tower Hamlets and surrounding boroughs; seeking to promote more sustainable operations at waste management facilities and the circular economy; and waste being a resource which can support future development within Tower Hamlets and London.

20.40 It should also be demonstrated how the operation of the facility either new or enhanced will minimise impact on surrounding existing uses and amenity.



20.41 Parts 1(c) and (j) seek to ensure applicants demonstrate that opportunities to transport both construction and operational waste from the site via rail and water are explored (including shared facilities at existing railheads, wharves, and depots) as a means to reduce congestion and vehicular movements on the road network. Information on sustainable transportation of waste should be submitted as part of the planning application, alongside details of reuse and recycling of waste arising during the construction phase in line with Policy RW1 (see part 7).

20.42 Developments providing additional waste management capacity will be encouraged to co-locate with existing waste facilities and other

compatible uses without having any significant detrimental impacts on the amenity and the function of the immediate and surrounding area to optimise the potential of sites and address the intensification of land uses, as per part 1(h).

20.43 The types of waste technology that will be suitable will depend on the nature and scale of the proposed scheme and the characteristics of the site and its surroundings, as required under part 1(i). Broad types of facility suitable for each area of search are set out in the schedule of areas in Policy RW1. These are likely to be small-scale facilities due to the constrained nature of the borough.

20.44 Part 1(l) seeks to mitigate adverse impacts associated with waste management facilities. Waste management facilities should be enclosed and covered on all vertical sides with small access and egress points, fitted with fast-acting doors, and incorporate an air filtering system to reduce airborne particulate concentrations in and outside of the building in line with Environment Agency advice. This provides an effective way of controlling dust and particulate pollution within waste developments. In cases where enclosure is not possible, proposals must provide details of proposed measures demonstrating how the control measures can adequately mitigate these impacts. Operators will be expected to obtain the appropriate environmental permits from the Environment Agency or the Local Authority and comply with the conditions of those permits at all times.

20.45 To minimise the impact on climate change, waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power, see Part 1(m), such as anaerobic digestion. In instances where this is not feasible, an energy statement must be submitted with the planning application demonstrating that it is not technically feasible or economically viable.

20.46 Part 2 seeks to offer applicants guidance on the content of management plans which are to be designed to ensure the operation of waste management facilities does not detrimentally impact on the amenity, environmental and infrastructure of the surrounding area during construction, operation and decommissioning. Management plans should include:

- ★ vehicle movements within the site, demonstrating there is adequate road capacity to accommodate any vehicle movements generated and that vehicles can enter, wait, unload and leave the site without prejudicing the safety of pedestrians and other road users;
- ★ how dust, mud or debris build up will be minimised on hard surfaces outside designated waste storage or processing areas;
- ★ site surfacing, ensuring the integrity of surfaces facilitates the safe and smooth movement of heavy goods vehicles around the site;
- ★ where and how waste is stored, how material drop heights will be minimised and stockpile height limited;
- ★ any water or odour neutralising misting system to prevent the escape of dust or odour from the site, and its maintenance;
- ★ wheel washing facilities to ensure vehicles do not track mud or debris around the site or onto the highway;
- ★ how vehicles will be sheeted and securely covered where carrying materials likely to generate dust or odour onto the public highway to and from the site;
- ★ how any build-up of dust, mud or debris will be monitored and reduced where it would inhibit the safe and efficient operation of the site; and
- ★ site maintenance and record keeping.

London Plan policies:

- D13 Agent of Change
- SI7 Reducing waste and supporting the circular economy
- SI8 Waste capacity and net waste self-sufficiency
- SI9 Safeguarded waste sites

Local Plan policies:

- DV5 Developer contributions
- CG4 Embodied carbon, retrofit and the circular economy
- CG6 Managing flood risk
- CG7 Sustainable drainage
- CG9 Air quality
- PS3 Securing design quality

Evidence base:

- Waste Data Study, 2023
- Waste Data and Waste Capacity Study Update 2024
- Don't let our future go to waste, Waste Management Strategy, 2018-2030
- Reuse, Recycling and Waste Supplementary Planning Document (SPD), adopted 2020

Policy RW3 Waste collection facilities in new development

1. All new development must include sufficient accessible space to separate and store dry recyclables, organics, residual and bulky waste for collection, both within individual units and for the building as a whole. Waste storage facilities within developments should be designed to avoid any adverse amenity impacts.
2. New major residential development proposals must incorporate high-quality on-site waste collection systems that do not include traditional methods of storage and collection and are compatible with waste collection methods set out in the Tower Hamlets Reuse, Recycling and Waste SPD. In instances where this is not practicable, supporting evidence must be submitted with the application to demonstrate this.
3. New residential, non-residential, and mixed-use development proposals should be accompanied by a Waste Management Plan that complies with the requirements of Tower Hamlet's Reuse, Recycling and Waste SPD.
4. Provision of waste storage and collection should be informed through early engagement with relevant London Borough of Tower Hamlet's service areas. Developments that propose provision of onsite waste management technologies should be discussed at an early stage of design with the London Borough of Tower Hamlet's waste management team.

Supporting text

20.47 Part 1 of this policy will help to ensure that waste is collected and managed in a sustainable manner in line with the principles of the Tower Hamlets' waste management hierarchy as set out in Figure 22. It is also intended to increase the amount of waste recycled and composted from all developments, and to improve waste collection systems in developments with communal waste facilities in particular. Tower Hamlets is working towards meeting the London Plan target of recycling 65% of municipal waste by 2030 and zero biodegradable waste to landfill by 2026. The volume of household waste that was reused, recycled, or composted in Tower Hamlets needs to increase to meet these targets and ensuring the required facilities are provided in new developments will help move towards and meet these targets.

20.48 This part also seeks to ensure that dry recyclables, organics, and residual waste will be segregated, and for residential developments bulked, at source within new developments to:

- a. minimise transport movements from waste collection operations;
- b. minimise the financial and operational burden on existing waste collection system;
- c. maximise efficient use of collection resources;
- d. encourage recycling behaviour by residents and reduce contamination of recyclables collected; and
- e. make a positive impact on the quality of the street scene.

20.49 Incorporating sufficient waste storage capacity within new developments should be done from the outset to avoid capacity shortfalls or poor quality service. Applicants will need to forecast how much organic, recyclable, and residual waste will be generated when

the development is occupied and demonstrate that sufficient space has been allocated to the storage and/or bulking of this waste in both individual units and for the development as a whole.

20.50 Tower Hamlets is seeking to move away from the traditional waste storage methods, such as standard wheeled bins, bagged collections, and Euro bin containers, towards central bulking systems particularly for residential developments that require communal waste collection facilities. Central bulking system rather than standard bins and communal Euro bins, offer more waste storage which can be stored before needing collection and more waste can be collected in a single round. As a general rule, all of the systems using bulk containers allow waste to be stored in a smaller footprint than standard communal Euro bins. The location of storage containers should be chosen to maximise operational convenience and minimise environmental, amenity and transport impacts.

20.51 Under part 2 of the policy, new major residential developments will be expected to incorporate on-site waste collection systems that are compatible with waste collection services. Such systems could include compactors, underground storage containers, vacuum systems, and automated waste collection systems. These systems require land to be set aside to store bulked waste materials, with the size and footprint varying from system to system. Preference should be given to systems that can provide for a weekly collection service as a minimum and allow separate collection of organic wastes or facilitate onsite processing of organics. Applicants should discuss options with the waste management team prior to the submission of an application. Food waste, household waste and recyclables must be separated to allow independent collection and onward management.



20.52 The Tower Hamlets Reuse, Recycling and Waste SPD sets out information on how waste management should be addressed in proposals for new residential (including mixed use) development. The SPD has been produced to support developers in submitting a planning application that meets the policy requirements of the Council. The principles set out in the SPD may also be applied to wholly commercial development and when existing development is refurbished. The Tower Hamlets Reuse, Recycling and Waste SPD sets out how the five stages of waste management and ten steps to occupation are to be followed to guide the most appropriate waste management system for new developments, and how to provide sufficient information in support

of a complete planning application. This SPD can be used to inform formulation of a waste management plan as required under part 3 of Policy RW3 – Waste collection facilities in new development.

20.53 In instances where it is not practicable or we consider it inappropriate for non-traditional waste collection systems to be incorporated within the development, the developer or managing agent must provide adequate space as well as collection containers that are in accordance with the requirements set out in the Tower Hamlets Reuse, Recycling and Waste SPD.

20.54 Planning applications should clearly set out the access route of the occupiers and the servicing vehicles, including a clear swept path in accordance with the Council's waste collection specifications, and access arrangements to container stores. The identified waste storage area must be designed to ensure refuse collection vehicles are able to enter and exit the highway in a forward gear and perform all collection activities within the curtilage of the development site. Applicants are advised to contact the waste management team that manages the collection of waste prior to submitting a planning application and adopt a collaborative approach to ensure these arrangements are in line with our waste collection services. Further advice is available in Tower Hamlets Reuse, Recycling and Waste SPD.

London plan policies:

- D6 Housing quality and standards

Local plan policies:

- HF9 Housing standards and quality

Evidence base:

- Reuse, Recycling and Waste SPD, 2020

DRAFT



Site Allocations

21. Introduction

21.1 Delivering sustainable places is an important aspect of spatial planning to address the needs and priorities of Tower Hamlets, such as building a significant number of homes to reduce overcrowding, and delivering long term benefits to people and communities across the borough. Successful place-making is critical to creating cohesive, well-connected and more vibrant communities and ensuring that development responds positively to the distinct and unique characteristics which make Tower Hamlets a great place to live, work and visit.

21.2 Policy DV1 (Areas of growth and opportunity within Tower Hamlets) sets out the overall strategy of how growth will be delivered across the borough. This section provides more detail on how different areas of the borough will accommodate this growth.

21.3 In order to realise the vision and objectives of the Local Plan, the following sub-areas have been identified to positively manage development opportunities, particularly housing delivery, and change in the borough at the strategic level:

- City Fringe
- Central
- Leaside
- Isle of Dogs and South Poplar.

21.4 This section sets out how each sub-area will grow and change over the period to 2038. In particular, it sets out the vision, objectives and overarching principles which will inform and guide development proposals within each sub-area.

21.5 Within each sub-area, a number of sites (known as allocations) have been identified to accommodate new homes and jobs alongside necessary infrastructure, such as open space, community, health and education facilities.

21.6 All of the sub-areas and site allocations are shown in Figure 24. This section also contains figures illustrating each sub-area and the site allocations within them. These figures are illustrative and show how the principles and requirements set out in this section could be implemented.

21.7 The site allocations have been selected following an assessment of their suitability for development (that they would not lead to inappropriate development that would have negative impacts on current or future residents of the borough), their availability and deliverability (that there is believed a realistic prospect of the sites being developed during the plan period), and that they can deliver a strategic amount of housing to help the borough meet its housing targets over the plan period (generally, this has been assumed to be at least 500 homes, although in some instances sites are delivering other strategic functions as well, such as employment space or student housing).

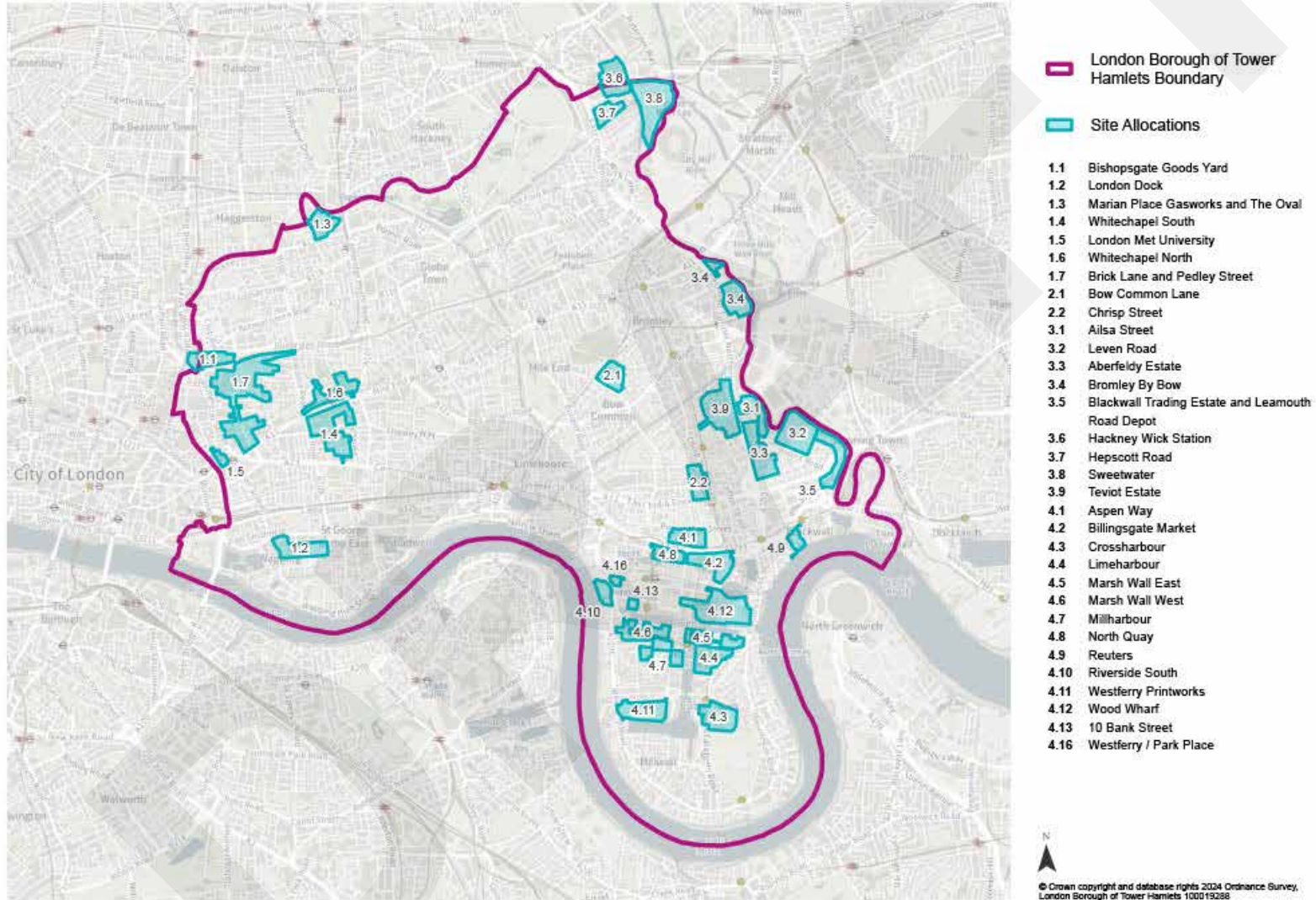
21.8 The site allocations have been further developed through a design-led site capacity assessment, as set out in the London Plan. This has involved looking at each site allocation in terms of what an appropriate layout, scale, mass, and height would be, and from there determining the capacity of housing and, where appropriate, other uses that could be included on site, taking into account the need to provide infrastructure on site allocations as well. These capacity assessments are intended to set out an appropriate form of development, but are not intended to be entirely prescriptive, and other forms of development may also prove to be acceptable where they meet the requirements of the site allocations, and do not exceed the maximum heights set out in them.

21.9 Development within these sub-areas will also need to take account of other relevant guidance and supporting information such as London Plan Guidance (LPGs)/Supplementary Planning Documents (SPDs), masterplans and Opportunity Area Planning Frameworks (OAPFs).

21.10 When determining a planning application, flexibility may be applied to the policies relating to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme to ensure the site allocation is deliverable in the context of the principles of sustainable development.

21.11 Some of the site allocations are under multiple ownership and comprise a number of development plots. In such cases, effective engagement between residents, landowners, developers and leaseholders needs to take place in order to facilitate potential land assembly and comprehensive redevelopment.

Figure 24: Site allocations



22. City Fringe

Location

22.1 The City Fringe sub-area is located in the western part of the borough, bounded by the City of London to the west, the London borough of Hackney to the north, the River Thames to the south, and the borough's inner city communities to the east. The sub-area also corresponds with the borough's portion of the London Plan's City Fringe opportunity area. The wider opportunity area also includes parts of the London boroughs of Hackney and Islington.

22.2 The City Fringe represents a collection of vibrant and distinctive town centres and employment hubs, which sit alongside residential areas. It comprises eight distinct character places. The Tower Hamlets Urban Structure and Characterisation Study provides more information on the key elements of the local character of each of these places.

Vision for City Fringe

22.3 By 2038, the City Fringe will become a more attractive place to live, work and visit. New communities will be well integrated into the area, benefiting from the close proximity to existing and new employment, retail and leisure uses within the wider area.

22.4 The world-class economic hub of the City of London will expand and opportunities arising from the Tech City and Med City initiatives will be maximised. Whitechapel, Cambridge Heath, Shoreditch, Spitalfields and Aldgate will all have a more diverse mix of commercial, cultural, leisure, tourism and night-time activities. It will be a place for new affordable and flexible employment spaces benefiting from the

arrival of the Elizabeth line and improved accessibility to the local area. Whitechapel and the surrounding area will benefit from new state-of-the-art research and education facilities and will accommodate start-ups and other supporting businesses.

22.5 A new civic centre and a new green spine to the south of Whitechapel Road will provide focal points for leisure and community/social activities. The public realm in and around the Tower of London world heritage site will be enhanced, with improved legibility and movement for all users.

22.6 A masterplan will be developed for the Brick Lane area, which will set out a tailored vision, strategic priorities, and detailed design guidance for the development of sites within the Brick Lane area. This will be reflected in the site allocation for Brick Lane and Pedley Street.

Objectives

- a. Create a new civic centre and world-class life science research hub at Whitechapel
- b. Protect and enhance the area's heritage assets and improve the historic character of the individual places
- c. Support a mix of uses to support the financial and business centres of the City of London, Tech City and the emerging research and life sciences cluster (Med City), whilst striking the appropriate balance between residential and commercial development
- d. Improve and enhance legibility, permeability and connectivity within, to and from the area, whilst enhancing and improving green grid links
- e. Strengthen the role and function of the area's distinctive and varied

town centres to provide a choice of cultural, leisure and retail activities, and

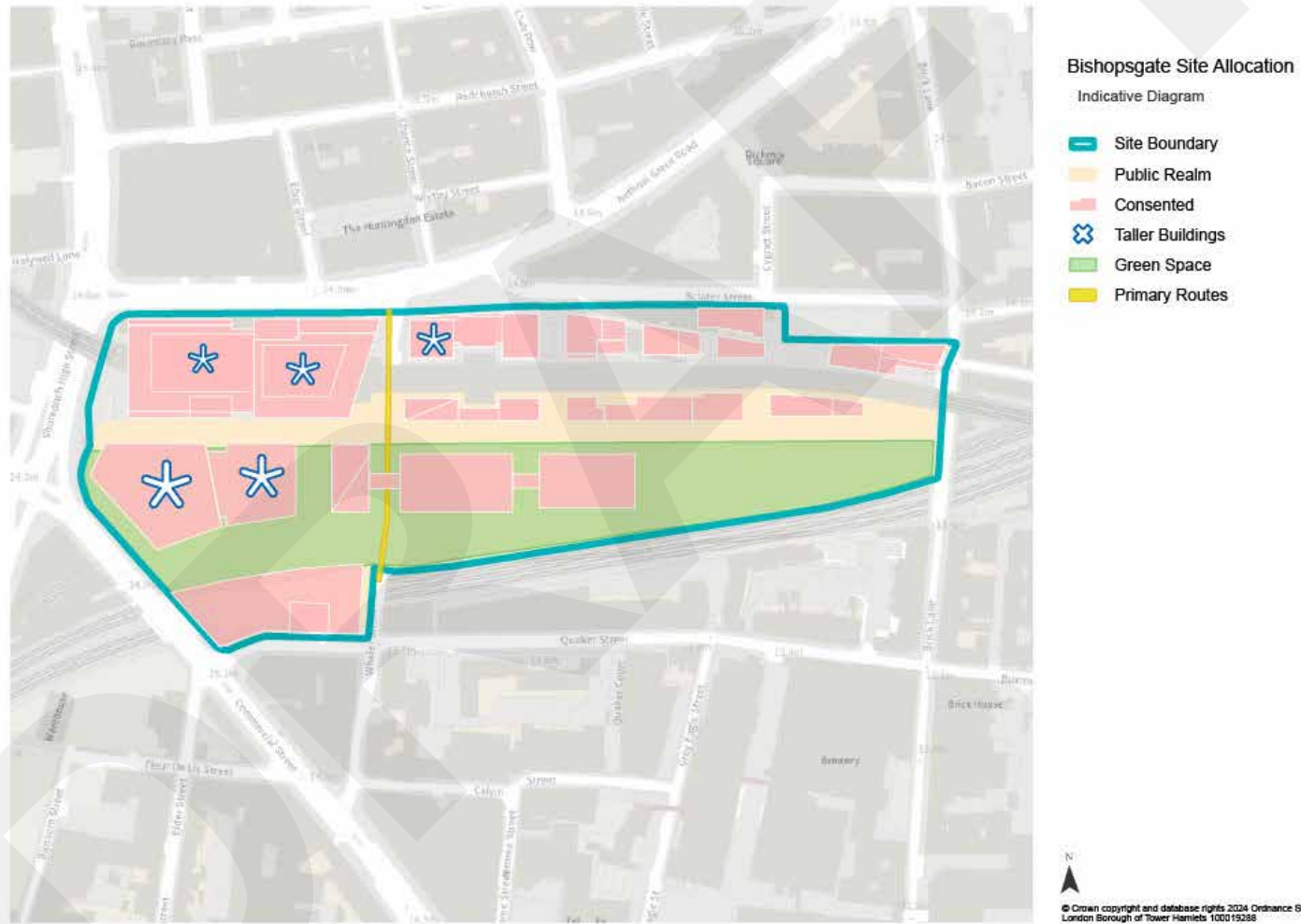
- f. Create new open spaces (including pocket parks and strategic open space) and improve links to existing publicly accessible open space.

Site Allocations in the City Fringe sub-area

- 1.1 Bishopsgate Goods Yard
- 1.2 London Dock
- 1.3 Parian Place Gasworks and The Oval
- 1.4 Whitechapel South
- 1.5 London Metropolitan University
- 1.6 Whitechapel North
- 1.7 Brick Lane and Pedley Street

1.1 Bishopsgate Goods Yard

Figure 25: 1.1 Bishopsgate Goods Yard (indicative)



Site information	Details
Address	Shoreditch High Street
Area [ha]	4.35
Ward	Weavers
PTAL [2031]	6a-6b
Planning designations Page 976	<ul style="list-style-type: none"> ● Area of substandard air quality ● London View Management Framework (views 8A.1 – Westminster Pier to St Paul's Cathedral, and 9A.1 – King Henry VIII's Mound to St Paul's Cathedral) ● Central Activities Zone ● Archaeological Priority Area (Spitalfields and Brick Lane, tier 2) ● Conservation Area (Fournier Street, adjacent to site) ● Statutory Listed Buildings (Braithwaite Viaduct, Grade II; Street Name Plaque Attached to Number 125 Brick Lane, Grade II, adjacent to the site; 2-38 Cheshire Street, Grade II, adjacent to the site)
Relevant Permissions	PA/14/02011 – outline permission for comprehensive mixed-use redevelopment including residential, business, commercial, and community uses. Included detailed permission for the tallest building and the retail arches.

Site proposal	Details
Indicative capacities	Within the Tower Hamlets portion of the site: <ul style="list-style-type: none"> ● 500 homes ● 11,500sqm non-residential uses - maximum
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development within the Tower Hamlets portion of the site should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the provision of a leisure facility and an Idea Store.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community and cultural uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community facility
 - Strategic consolidated open space of minimum 1 hectare
- This is a cross-boundary site with the London Borough of Hackney. Development should coordinate consultation across planning authorities and address cross-boundary issues.
- The community facility should be delivered within or adjacent to the Brick Lane district centre.

Form, massing, and heritage

- Height strategy: Maximum height of 105m at the tallest point within Tower Hamlets, which should be located at the western end of the Tower Hamlets portion of the site, around Shoreditch High Street Overground station, on the boundary with the London Borough of Hackney. Heights should step down towards the eastern end of the site. This allocation does not set heights within the part of the site that is within the London Borough of Hackney.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes the Fournier Street conservation area, the existing Grade II-listed Braithwaite viaduct, Oriel gate and the forecourt wall to the former goods station fronting Shoreditch High Street, and other identified heritage assets. Consideration must also be given to the impact on strategic and local views. Development should also protect or enhance heritage assets in the surrounding areas (including within the London Borough of Hackney). For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

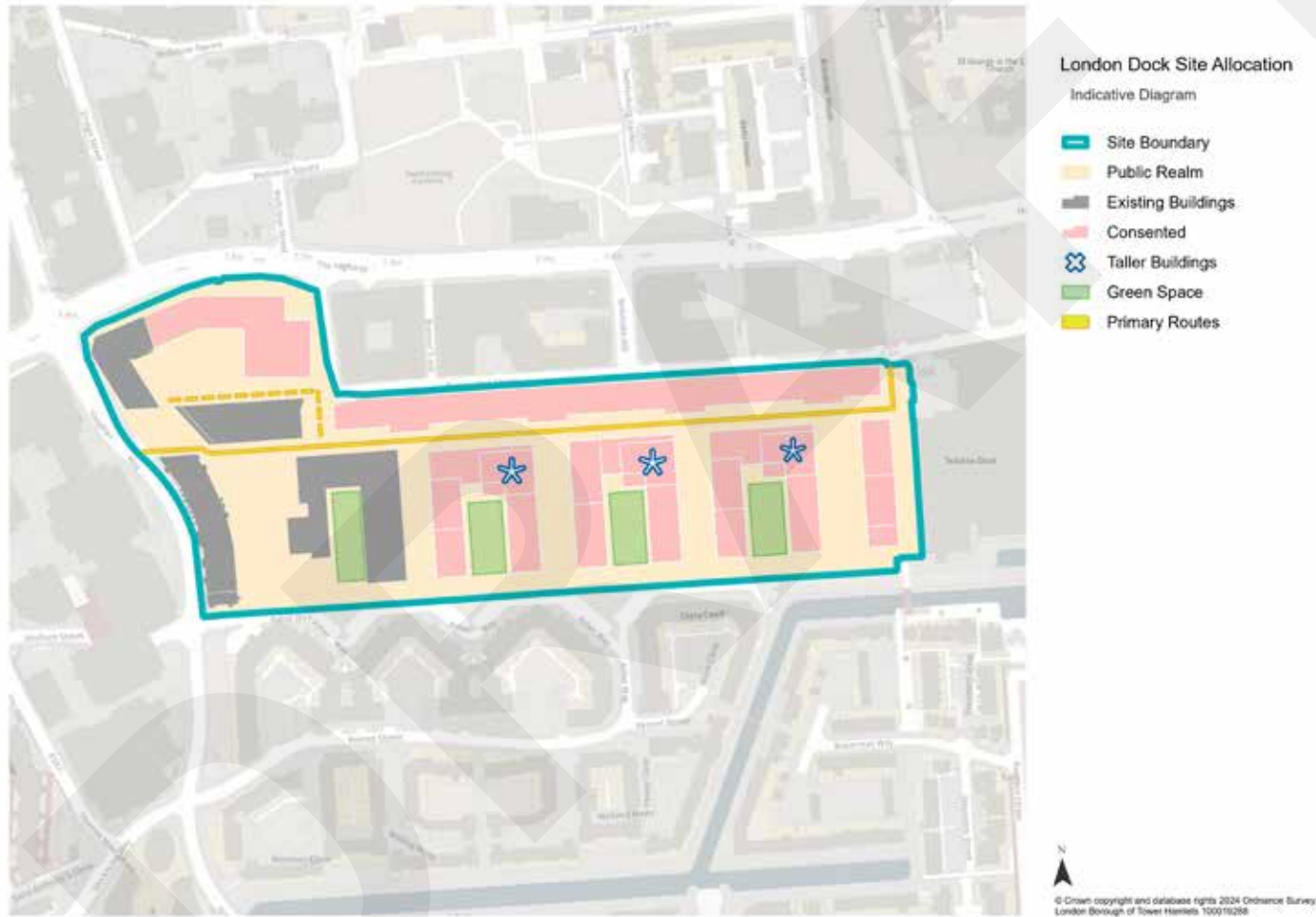
- Improve walking and cycling routes to, from and within the site to establish connections to Shoreditch High Street Overground station, Brick Lane District Centre, Shoreditch Triangle and the new open space. These should align with the existing urban grain to support permeability and legibility. Connections should be made to the green grid at Brick Lane and Quaker Street.

Environment and public realm

- Integrate development with the surrounding area and improve the street frontage and public realm on key routes, particularly along Wheler Street and ensure it is well integrated into the public squares to the east and south of the station.
- Provide a consolidated open space with a minimum size of one hectare, integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park located above the Braithwaite Viaduct.

1.2 London Dock

Figure 26: 1.2 London Dock (indicative)



Site information	Details
Address	Pennington Street
Area [ha]	5.78
Ward	St Katharine's and Wapping
PTAL [2031]	2-5
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area (small part of the site) ● Site of Importance for Nature Conservation (Shadwell Basin, Wapping Wood, and Wapping Canals, adjacent to the site) ● Tower Hamlets Activity Area ● Archaeological Priority Area (Wapping, tier 2) ● Neighbourhood Planning Area (Wapping) ● Statutory Listed Buildings (Pennington Street Warehouses and Vaults, Grade II; Tobacco Dock Warehouse, Grade I, adjacent to site)
Relevant Permissions	PA/13/01276 (and subsequent amendments) – outline permission for comprehensive mixed-use redevelopment including residential, business, commercial, and community uses (including a school). Included detailed permission for plots A, B, and C. PA/16/02851 – reserved matters for plot D. PA/19/00766 – reserved matters for Plot E, the secondary school. PA/19/01684 – reserved matters for plot F . PA/22/02666 – reserved matters for plot G.

Site proposal	Details
Indicative capacities	1,800 homes Up to 21,500sqm of non-residential floorspace
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the provision of a secondary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Secondary School

Form, massing, and heritage

- Height strategy: Maximum height of 98m at the tallest point, which should be the extant plot C1 located to the west of the site. Heights should generally step down towards Tobacco Dock to the east of the site.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes the listed warehouses on site and the nearby grade I listed Tobacco Dock. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site. These should align with the existing urban grain to support permeability and access to Thomas More Neighbourhood Centre, St Katharine Docks, Tobacco Dock and the Wapping Canal, and to improve walking and cycling connections across The Highway. Safe access routes to the secondary school are required, and development will need to deliver improved pedestrian and cycling routes. Green grid improvements should be made along Vaughn Way, Pennington Street, and across the eastern edge of the site near Tobacco Dock, and should provide good quality onward connections to the green grid routes at Ensign Street, Artichoke Hill, and the ornamental canal, and to Swedenborg Gardens.

Environment and public realm

- Provide publicly accessible open space of at least 0.4 hectares in size, which should be easily accessible from across the site and connected to the green grid route.
- Improve the public realm at active site edges, particularly along The Highway and Vaughan Way where high levels of traffic can currently create an unwelcoming public realm.

1.3 Marian Place Gasworks and The Oval

Figure 27: 1.3 Marian Place Gasworks and The Oval (indicative)



Site information	Details
Address	Marian Place/The Oval/Emma Street
Area [ha]	4.38
Ward	Bethnal Green West
PTAL [2031]	4-6a
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (part of the site) ● London View Management Framework (view 8A.1 – Westminster Pier to St Paul’s Cathedral) ● Site of Importance for Nature Conservation (London’s Canals, adjacent to the site) ● Publicly Accessible Open Space (The Oval) ● Local Employment Location ● Conservation Area (Regents Canal, part of site; Hackney Road, part of site) ● Statutory Listed Buildings (2 Pritchards Road, Grade II; 444 Hackney Road, Grade II, adjacent to site; 446-450 Hackney Road, Grade II, adjacent to site)
Relevant Permissions	PA/19/02717 - Demolition of existing buildings, decontamination/remediation of the site and retention (including dismantling, refurbishment and reinstatement) of the two existing gasholder frames to facilitate redevelopment for a mixed-use development comprising 5 buildings ranging between 6-13 storeys to contain 555 residential dwellings and 4,182sqm non-residential floorspace in flexible A1-A4, B1 and D Use Classes.

Site proposal	Details
Indicative capacities	700 homes (550 on the gasholder site) 4,000sqm of new non-residential floorspace (minimum)
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses..
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses, including employment space for start-ups, SMEs, and creative industries (Class E)
 - Community uses (Class F1/F2)
- Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on-site decontamination requirements caused by the gas works. An assessment should be carried out to understand the potential contamination on site prior to any development taking place.
- The site is within the Cambridge Heath Local Employment Location, and should provide a range of office, light industrial, and studio workspaces suitable for start-ups, SMEs, and creative industry businesses.
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners,

developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Maximum height of 57m at the tallest point, which should be located within the former gasworks site. Heights should step down around the former gasworks.
- Development should respond positively to the special character of the Regents Canal Conservation Area and its setting, the scale, height, massing and fine urban grain of the surrounding built environment, and integrate heritage assets on site through retaining, reusing and enhancing the existing heritage assets, including gasholders no.2 and no.5, the Victorian buildings adjacent to the Regents Canal, and the Georgian cottages, including the associated setted street and railings. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

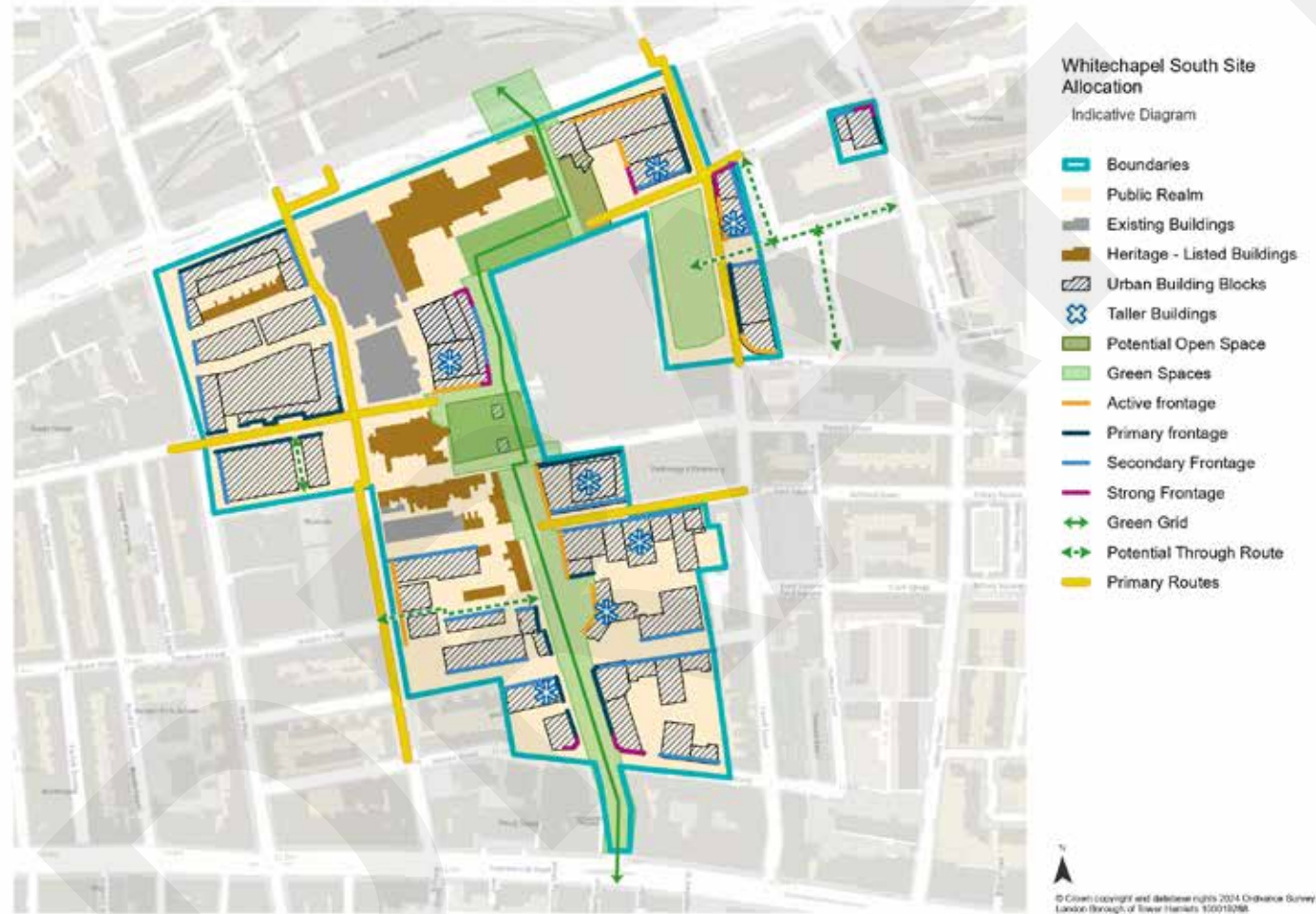
- Improve walking and cycling connections to, from and within the site. These should align with the existing urban grain to support permeability and link with Cambridge Heath Neighbourhood Centre. Development must provide public access along the waterfront at the Regents Canal, and provide good quality walking and cycling routes to the waterfront. Green grid improvements should be made along Emma Street, Hackney Road, Pritchard's Road, The Oval, and along the Regent's Canal, and provide good quality connections onwards to the green grid at Temple Street.

Environment and public realm

- Re-use The Oval as new public open space which positively contributes to the surrounding buildings and is well-connected to the new open space. The Oval should be fronted by a continuous building line following its footprint.
- All proposals for development within the site allocation should look to contribute to an overall provision of 1ha of new public open space across the allocation as a whole, delivered through a number of smaller open spaces and pocket parks.
- Provide active frontage at the waterside, set back from the canal; and positively frame the open space and The Oval to avoid excessive overshadowing.
- Improve the public realm with active site edges, particularly along Hackney Road, Pritchard's Road, Emma Street and The Oval. In addition, generous pavement and a linear landscaped square should be provided along Hackney Road, if this is made possible through redevelopment of the buildings that front it.

1.4 Whitechapel South

Figure 28: 1.4 Whitechapel South (indicative)



Site information	Details
Address	Whitechapel Road/Stepney Way/Varden Street
Area [ha]	9.99
Ward	Whitechapel
PTAL [2031]	6b
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Area of deficiency of access to nature ● Town Centre (Whitechapel District Centre) ● Local Employment Location ● Archaeological Priority Area (Mile End, tier 2) ● Conservation Area (London Hospital, part of site; Myrdle Street, part of site; Ford Square, part of site; Whitechapel Market, adjacent to site) ● Statutory listed buildings (Two K2 Telephone Kisoks, Grade II; The London Hospital, Grade II; 18-34 Mount Terrace, Grade II; Pillar Box in Rear Courtyard of London Hospital, Grade II; St Augustine with St Philip's Church, Grade II*; 26-42 Newark Street, Grade II; 43-69 Philpot Street, Grade II; 46-48 Ashfield Street, Grade II; 39-49 Walden Street, Grade II; 2-16 Walden Street, Grade II; 24-32 New Road and Attached Railings, Grade II; and numerous Grade II listed assets adjacent to the site)

Site information	Details
Relevant Permissions	<p>PA/15/02959 – Redevelopment to provide 12 buildings ranging from ground plus 2 – 23 storeys, comprising 343 residential dwellings, 168 specialist accommodation units, office floorspace, flexible office and non-residential institution floorspace, retail floorspace.</p> <p>PA/17/02825 – Partial demolition, including removal of the remaining west wing and the grocer's wing (behind retained façade), alteration and refurbishment of the former Royal London Hospital and erection of a part four-storey and part seven-storey extension (including partial basement) to provide a new Tower Hamlets Council Civic Centre.</p>

Site proposal	Details
Indicative capacities	<p>837 homes (65 on Royal Mail site, 772 on Whitechapel Estate site)</p> <p>425 student rooms (additional student housing on Floyer House site)</p> <p>93,000sqm non-residential floorspace (65,000sqm on NHS Life Sciences sites, 18,000 on Royal Mail site, 10,000sqm on Whitechapel Estate site)</p>
Phasing	2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace and community uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Student housing, only at Floyer House (sui generis)
 - Town centre uses, including employment space for life sciences only on the existing NHS sites in the west of site and a small amount on the Whitechapel Estate (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - NHS primary health care facility (including
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- The existing sexual health facility (including HIV services) will need to be re-provided on site in accordance with the prevailing sexual health facility building guidance (e.g. Health Building Note 12-01: Consulting, examination and treatment facilities. Supplement A: Sexual and reproductive health clinics) unless an alternative location can be found which meets the requirements of the relevant community facility policies. A continued service will need to be maintained to the satisfaction of the council's public health team.
- The site is within the Whitechapel Local Employment Location, and should provide a range of small office spaces to meet local needs. Life Sciences developments will only be acceptable on the NHS-

owned sites in the west of the site allocation, between New Road and Turner Street. A small amount of additional life sciences development may be acceptable on the Whitechapel Estate site, but only as part of developments that provide at least as much standard housing (use class C3) as the current permission on that site. Beyond this, development of workspace should focus on local needs.

- Student housing will only be acceptable on the existing student housing site at Floyer House – this will contribute towards the continuing functioning of the QMUL campus in this area.
- This site could potentially be suitable for accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Taller elements should be focused around the existing tall building at the Royal London Hospital. Maximum heights of 68m on the Post Office site, 61m on Floyer House, 88m on the northern part of the Whitechapel Estate, and 64m on the southern part of the Whitechapel Estate. Heights should step down towards the west of the site.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes the setting of the London Hospital Conservation Area. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

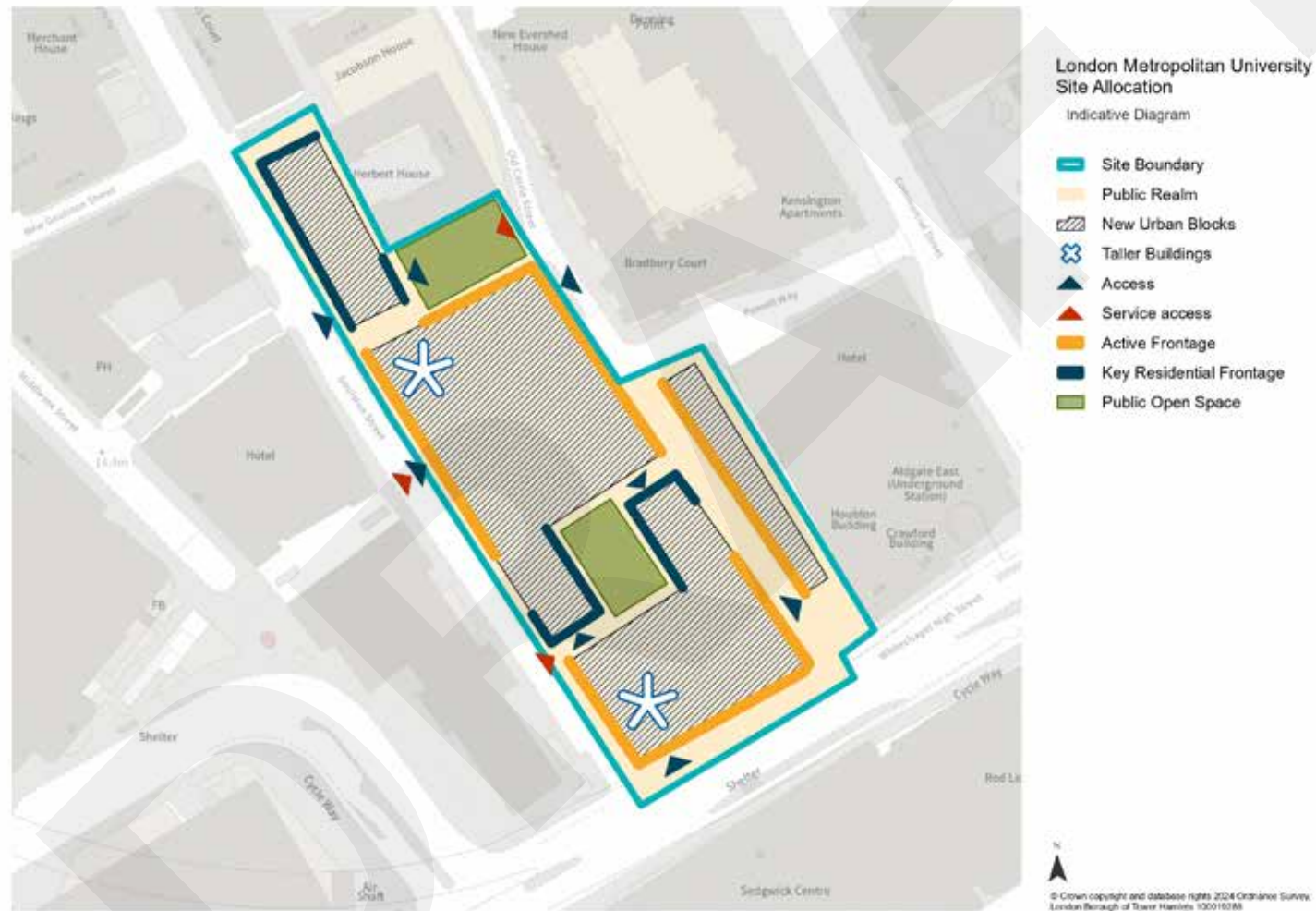
- Enhance connections to the Whitechapel North site allocation, and ensure the streetscape along Whitechapel High Street and adjoining streets is improved. Improvements to the green grid should be provided along Whitechapel High Street, Stepney Way, New Road, and Cavell Street, along with good quality connections to surrounding green grid routes. This is a large site, and connections need to be improved both north-south and east-west.

Environment and public realm

- Development should contribute to the delivery of a new and improved green open space (the Green Spine) stretching from Philpot Street to the new civic centre. It should be linear in nature and provide a direct visual link and improved north-south legibility across its length.
- Existing consented open space which has yet to be implemented on site is an integral element to the provision of one hectare of strategic open space and should be re-provided. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new Green Spine to maximise its multi-functional use.
- Create a sense of place set around a public square behind the former Royal London Hospital building and new public square immediately to the east of St Augustine with St Philip's Church to positively integrate the life sciences and research hub with the new civic centre and the green spine.

1.5 London Metropolitan University

Figure 29: 1.5 London Metropolitan University (indicative)



Site information	Details
Address	Goulston Street/Whitechapel High Street
Area [ha]	1.03
Ward	Spitalfields and Banglatown
PTAL [2031]	6b
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● London View Management Framework (view 25A.1 – The Queen’s Walk to Tower of London) ● Area of deficiency of access to nature ● Central Activities Zone ● Archaeological Priority Area (Aldgate and Portsoken, tier 2) ● Conservation Area (Wentworth Street, adjacent to site)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	520 student rooms 33,500sqm of educational floorspace
Phasing	2030-34

Land uses, activities, and delivery

- Development should consist of a redevelopment of the university buildings to provide additional teaching space and student accommodation.
- Acceptable land uses include:
 - Student housing (sui generis)
 - Residential (Class C3)
 - Educational space (Class F1)
 - Town centre uses along the High Street (Class E)
- The site is within the CAZ, and active frontages and town centre uses should predominate at ground level.

Form, massing, and heritage

- Height Strategy: Maximum height of 63m at the tallest point, which should be located on the southwestern corner of the site, with an additional taller point of 56m further north. Heights should step down towards the existing residential buildings in the surrounding area.
- The impact of development on nearby conservation areas and on protected views should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes ensuring no negative impact on the backdrop of the view of the Tower of London. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

- Some of the existing buildings contribute positively to the character of the area, and adaptive re-use of these existing buildings should be explored. This includes the brick-faced buildings along Whitechapel High Street, the original Calcutta House building, the Annex to Calcutta House, and the locally listed wash houses towards the north of the site.

Routes and streets

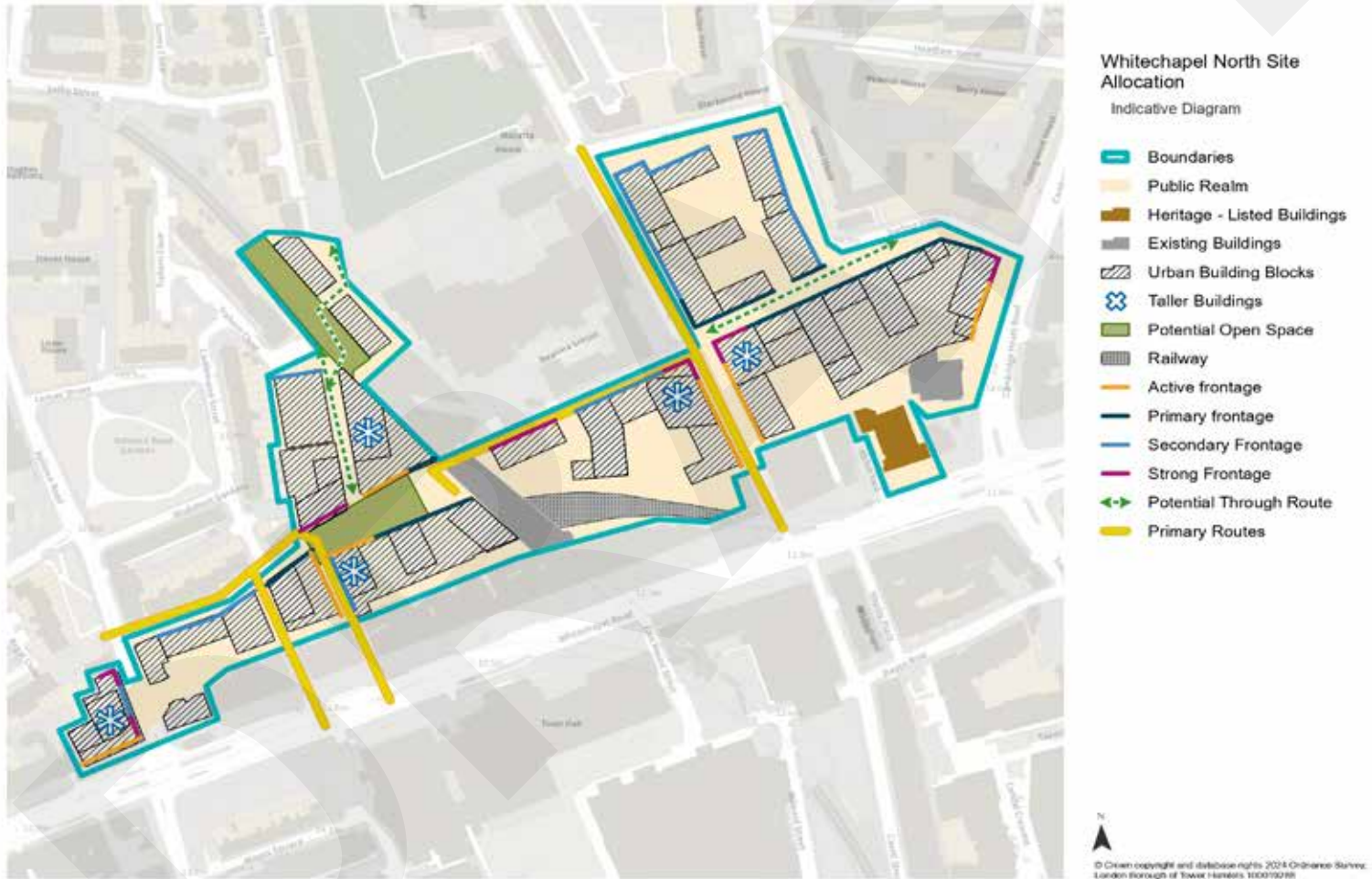
- Improve walking and cycling connections to and from the site, ensuring high quality connections to the underground stations at Aldgate and Aldgate East. Improvements to the green grid should be delivered along Whitechapel High Street, and good quality connections should be provided to the green grid route to the north of the site at Wentworth Street.

Environment and public realm

- Improved public realm and active frontages should be provided at principal entrances to key buildings, including along the Whitechapel High Street frontage, Goulston Street, and Old Castle Street.
- Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site should therefore aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm.

1.6 Whitechapel North

Figure 30: 1.6 Whitechapel North (indicative)



Site information	Details
Address	Durward Street/Brady Street/Vallance Road
Area [ha]	5.37
Ward	Spitalfields and Banglatown
PTAL [2031]	6a-6b
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Town Centre (Whitechapel District Centre) ● Local Employment Location ● Archaeological Priority Area (Whitechapel, tier 2; and London to Colchester Roman Road, tier 2) ● Conservation Area (Whitechapel Market; London Hospital and Myrdle Street, both adjacent to site) ● Statutory Listed Buildings (261-267 Whitechapel Road, Grade II; K2 Telephone Kiosk, Grade II; Kind Edward VII Jewish Memorial Drinking Fountain, Grade II; Parish Boundary Marker, Grade II; Albion Brewery Entrance Block, Grade II, adjacent to site; and numerous other Grade II listed assets adjacent to the site)
Relevant Permissions	None

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Site proposal	Details
Indicative capacities	<p>1,225 homes (575 on Sainsbury's site, 200 on Kempton Court site, 200 on Whitechapel Station site, 160 on Sports Centre site, 90 on Vallance Road site)</p> <p>At least 4,500sqm retail space (primarily on Sainsbury's site)</p>
Phasing	2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace and community uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Re-provision and enhancement of NHS primary health care facility
 - Re-provision of leisure centre
 - Community facility
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners,

developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

- As part of the site allocation, the market facilities should be reprovided, with associated storage and waste facilities provided. The site could also potentially provide operational car parking for the market, to remove parking from Whitechapel Road.
- As part of the site allocation, the leisure centre should be reprovided with at least the same floorspace as the existing leisure centre, and with provision of a 3G artificial grass pitch.
- This site could potentially be suitable for accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Maximum heights at the tallest points of 56m at the Sainsbury's site and 52m at the corner of Vallance Road and Whitechapel Road, with heights stepping down around these points.
- Development on the Vallance Road site should repair and incorporate the locally listed building to the north of the street corner.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

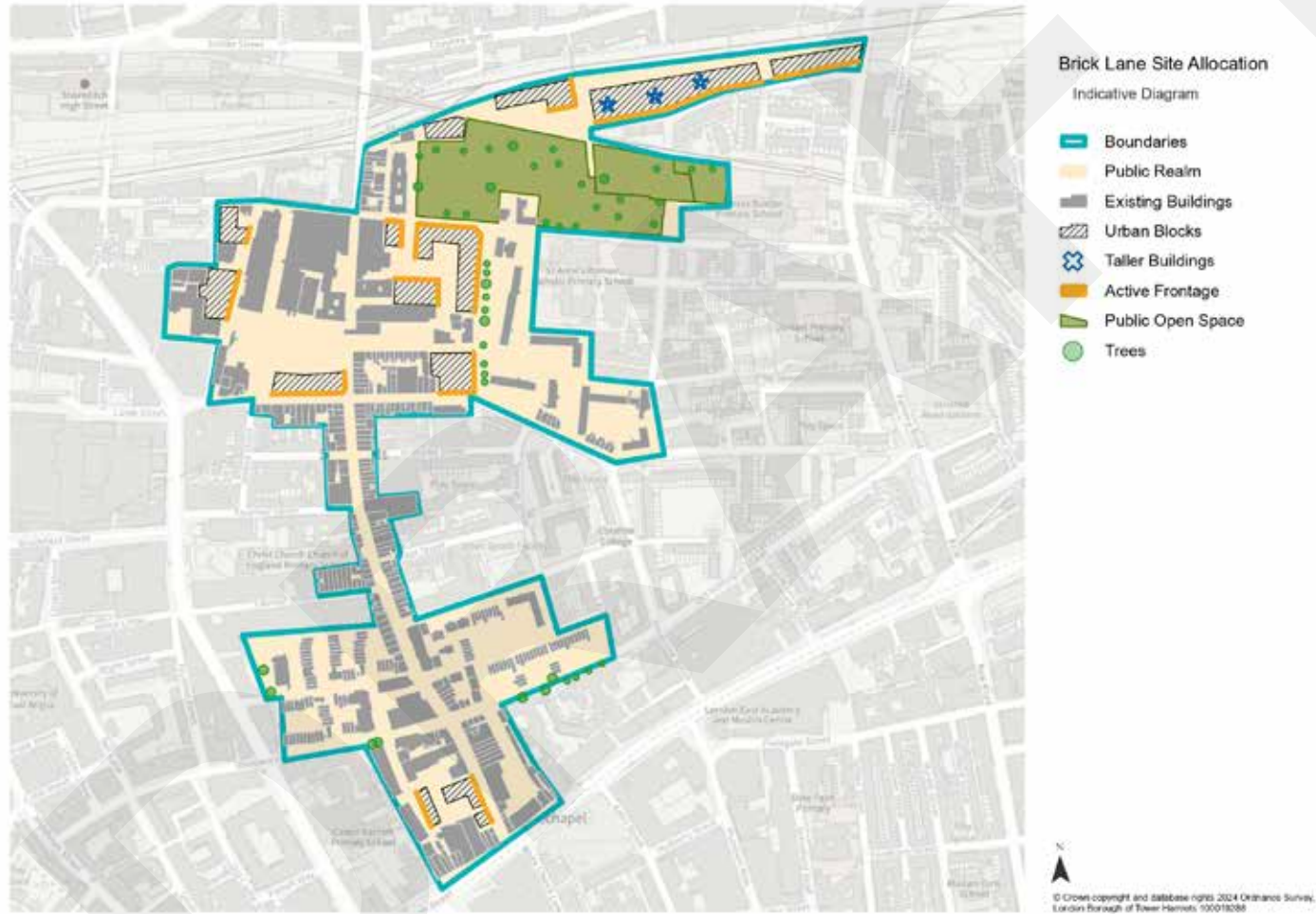
- Enhance connections to the Whitechapel South site allocation and ensure the streetscape along Whitechapel High Street and adjoining streets is improved. Improvements to the green grid should be delivered along Whitechapel High Street, Vallance Road, and Brady Street, along with good quality onward connections to surrounding green grid routes such as that along Old Montague Street. This is a large site, and connections need to be improved both north-south and east-west.
- Vehicle movements around the redeveloped supermarket should be carefully considered to minimise conflict between pedestrians, cyclists, and motorised vehicles.

Environment and public realm

- Parking for the re-provided supermarket should be provided in a way which minimises the negative impact on the public realm and on primary routes for pedestrians and cyclists. Similarly, the provision of market storage areas should be carefully considered to avoid large areas of dead frontage.

1.7 Brick Lane and Pedley Street

Figure 31: 1.7 Brick Lane and Pedley Street (indicative)



Site information	Details
Address	Brick Lane/Pedley Street
Area [ha]	20.56
Ward	Spitalfields and Banglatown
PTAL [2031]	3-6b

Site information	Details
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (part of the site) ● London View Management Framework (views 9A.1 – King Henry VIII's Mound to St Paul's Cathedral, and 25A.1 – The Queen's Walk to Tower of London) ● Site of Importance for Nature Conservation (Spitalfields City Farm and Allen Gardens) ● Publicly Accessible Open Space (Allen Gardens, Allen Gardens Play Area, and Spitalfields City Farm) ● Town Centre (Brick Lane District Centre) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Spitalfields) ● Archaeological Priority Area (Spitalfields and Brick Lane, tier 2) ● Conservation Area (Fournier Street) ● Statutory Listed Buildings (Director's House, Truman Brewery, Grade II*; Brewmaster's House, Truman Brewery, Grade II; Former Stables at Truman Brewery, Grade II; Engineer's House, Truman Brewery, Grade II; Vat House, Truman Brewery, Grade II; Black Eagle Brewery, Grade II; 35 Buxton Street, Grade II; and numerous Grade II listed assets adjacent to the site)

Site information	Details
Relevant Permissions	PA/20/00415 - Redevelopment to include erection of a part five storey office building with ground floor and first floor commercial units and two storey basement for provision of plant, servicing, storage and a gym.

Site proposal	Details
Indicative capacities page 996	<p>800 homes (410 on Fleet Street Hill and Pedley Street sites 250 on Truman Brewery East and Banglatown Cash & Carry sites 95 on Grey Eagle Street sites 45 on Osborn Street site)</p> <p>Up to 33,000sqm of non-residential floorspace (17,500sqm on Fleet Street Hill and Pedley Street sites 5,000sqm on Truman Brewery East and Banglatown Cash & Carry sites 1,500sqm on Grey Eagle Street sites 5,500sqm on Hanbury Street site 3,500sqm on Osborn Street site)</p>
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace and community uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community facility
 - Improved crossings of the railway lines in the north of the site
 - Enhancements to public realm and Allen Gardens
- The site is in multiple ownership and consists of a number of fragmented sites with opportunities for redevelopment, and landowners and developers should work together with the council to implement a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- New employment spaces delivered on this site must include a majority of spaces that are suitable for small-scale local businesses that will serve the local community.

Form, massing, and heritage

- Height Strategy: Maximum height of 70m at the tallest point, which should be located on the Pedley Street site, with heights stepping down to a maximum of 39m on the Fleet Street Hill site. Heights on the rest of the site should respect the prevailing context of the conservation area, with maximum heights of 40m on the Truman Brewery, Cash & Carry, and Grey Eagle Street sites, and 32m on the Osborn Street site.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. In particular, the character of the Fournier Street Conservation Area should be preserved and, where possible, enhanced. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site, particularly to connect up Allen Gardens, the Truman Brewery estate, and Shoreditch High Street station. These connections should align with the existing urban grain to support permeability and provide easy access to the district centre. Improved green grid routes should be delivered along Brick Lane, Fournier Street, Buxton Street, Quaker Street, and Wentworth Street, with good quality onward connections to adjoining green grid routes towards Shoreditch High Street Station and the adjacent Bishopsgate Goods Yard site allocation, and along Whitechapel High Street.

- There are a number of large street blocks within the site that present barriers to permeability, such as the Grey Eagle Street car park and other parts of the Truman Brewery estate, and the railway lines in the north of the site, and development should look to improve north-south and east-west connections through these blocks where possible.
- Vehicle movement along narrow streets in this area should be carefully considered to minimise conflict between pedestrians, cyclists, and motorised vehicles.

Environment and public realm

- Development should capitalise on opportunities to provide new small public open spaces, including pocket parks.
- Improvements to the public realm in this area should include additional street lighting, wayfinding, and street furniture, to create a place in which people can dwell, meet friends, and eat food, rather than just a place to pass through. Street furniture should be carefully considered and well-placed to ensure it creates sociable places and does not simply add to street clutter on busy routes.
- Applicants should consider how new development can contribute to explaining and emphasising the historic and cultural importance of Brick Lane.

23. Central

Location

23.1 The Central sub-area sits in the heart of the borough, bounded by London Borough of Hackney to the north, the London Legacy Development Corporation and the Leaside sub-area to the east, the Isle of Dogs and South Poplar sub-area to the south, and the City Fringe sub-area to the west. The sub-area is not a designated opportunity area, but has the capacity to deliver new development.

23.2 The sub-area is a collection of vibrant and distinctive town centres, transport interchanges and residential areas. The sub-area comprises parts of nine distinct character places (see Figure 26). The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Vision

23.3 By 2038, the distinct character and identity of the Central sub-area will have been enhanced and strengthened. Growth will be focused around vibrant and revitalised town centres and neighbourhood parades, including Roman Road and Mile End town centres. New development will complement the well-established streetscape and character and the area's many heritage assets, and their settings will be preserved or enhanced through opportunities for new heritage-led development.

23.4 Access to and the quality of the area's green open spaces (including Victoria Park and Mile End Park) and network of waterspaces (including Regents Canal and Limehouse Cut) will be enhanced and

opportunities for new green links and open spaces will be maximised. New development will reduce the severance resulting from The Highway, Mile End Road and Commercial Road, the waterways and railway lines, and provide public realm improvements. Improved cycling and walking routes will increase local accessibility and access to strategic cycle routes and transport interchanges.

23.5 Employment in the area will remain primarily local and small-scale focused in town centres and transport hubs, including Bethnal Green, Mile End and Limehouse. Industrial locations along The Highway and Limehouse Cut will further complement existing employment opportunities and will accommodate an increasing number of flexible workspaces suited to new growth industries, including creative and digital industries.

23.6 Queen Mary University of London's role as a knowledge hub will be strengthened, with stronger connections to Mile End Neighbourhood Centre and its public transport interchange. The area will be home to a more diverse range of residential and student communities, with a particular focus on family housing which will benefit from access to varied open spaces.

Objectives

- a. Ensure the strategic north-south spine of Victoria Park and Mile End Park is protected and enhanced with walking and cycling links, whilst maximising opportunities to access the waterways for recreational use

- b. Support a mix of uses in town centres to facilitate community cohesion and strengthen their role, including employment, retail, civic, cultural and leisure uses
- c. Overcome the physical barriers of the road, rail and waterway network to increase connectivity within the area, improve permeability between transport nodes and town centres to strengthen interconnected places
- d. Encourage the regeneration of key historic buildings to preserve the area's diverse heritage assets and character
- e. Deliver a range of housing choice from student accommodation, family housing, infill development and intensification where it contributes to delivering mixed and balanced communities, and
- f. Support the expansion of Queen Mary University of London and associated uses, while ensuring good integration with surrounding areas.

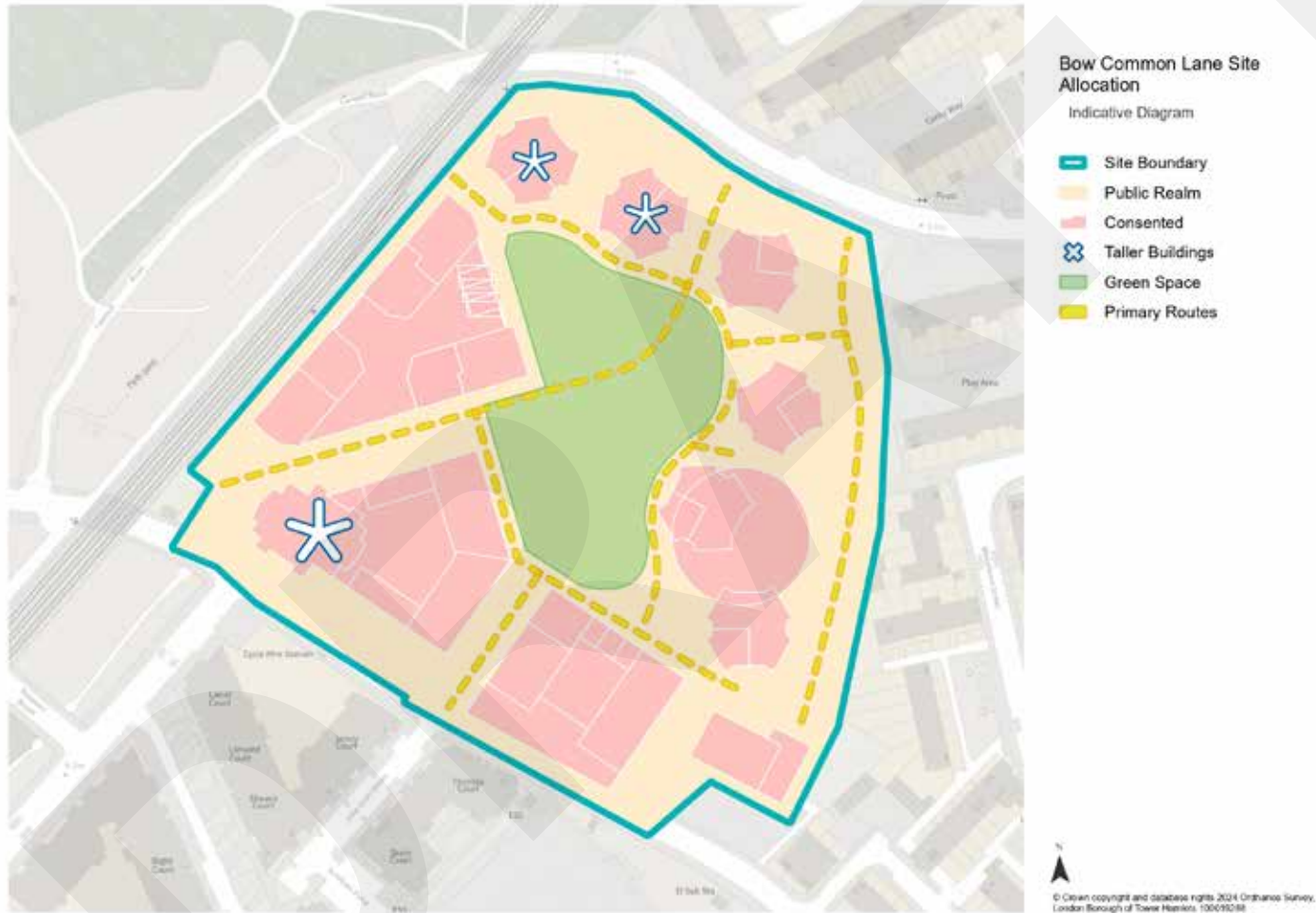
Site Allocations in the Central sub-area

2.1 Bow Common Lane

2.2 Chrisp Street

2.1 Bow Common Lane

Figure 32: 2.1 Bow Common Lane (indicative)



Site information	Details
Address	Bow Common Lane
Area [ha]	3.94
Ward	Bromley South
PTAL [2031]	2-3
Planning designations	<ul style="list-style-type: none"> ● Local Nature Reserve (Tower Hamlets Cemetery Park, adjacent to the site) ● Site of Importance for Nature Conservation (Tower Hamlets Cemetery Park and the Soane Centre, Old Railway at Fairfoot Road, part of Mile End Park SINC, all adjacent to the site) ● Metropolitan Open Land (Tower Hamlets Cemetery, adjacent to the site) ● Publicly Accessible Open Space (Bow Common Lane Gas Works) ● Conservation Area (Tower Hamlets Cemetery, adjacent to site)

Site information	Details
Relevant Permissions	<p>PA/19/02379 – outline permission for comprehensive mixed-use development for residential, business uses including office and flexible workspace, retail, financial and professional services, food and drink uses, community, education and cultural uses, a sixth form centre, assembly and leisure uses, public open space.</p> <p>PA/22/00905/S – approval of reserved matters for blocks A, B, and C, including the construction of residential units, flexible residential facilities, and commercial uses, together with new public open space.</p>

Site proposal	Details
Indicative capacities	1000 homes 2,500sqm retail/workspace/community/cultural uses
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and sixth form educational centre.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Sixth Form education facility
 - Strategic consolidated open space of minimum 1 hectare
- Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on-site decontamination requirements caused by the gasworks. An assessment should be carried out to understand the potential contamination on site prior to any development taking place.

Form, massing, and heritage

- Height strategy: Maximum height of 89m at the tallest point, which should be located towards the western side of the site. Heights should step down towards the existing residential buildings to the south and east of the site.
- Respond positively to the scale, height, and massing of the surrounding built environment, and to the nearby conservation areas at Swaton Road and Tower Hamlets Cemetery Park and nature reserve. The impact of development on the conservation areas should be considered, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting

place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and through the site, to address poor permeability created by the site. These should align with the existing urban grain to support legibility, particularly joining Knapp Road to Bow Common Lane, which should also see improvements to the green grid delivered. Good quality onward connections to the green grid routes along the railway arches and through the cemetery park should also be provided.
- Integrate the site with Tower Hamlets Cemetery Park through new or improved pedestrian and cycle routes.
- Ensure safe pedestrian and cycling access to the sixth form centre.

Environment and public realm

- Improve public realm with active site edges, particularly along Bow Common Lane.
- Provide active frontages along the railway to enhance the use and setting of the railway arches as a non-designated heritage asset.
- Implement noise screening measures/or a green buffer in areas bordering the railway line.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting should be investigated.

2.2 Crisp Street

Figure 33: 2.2 Crisp Street (indicative)



Site information	Details
Address	Chrisp Street
Area [ha]	3.92
Ward	Lansbury
PTAL [2031]	3-6a
Planning designations Page 1004	<ul style="list-style-type: none"> ● Area of substandard air quality (part of the site) ● Flood risk area ● Area of deficiency of access to nature ● Publicly Accessible Open Space (Chrisp Street Market) ● Town Centre (Chrisp Street District Centre) ● Archaeological Priority Area (Lea Valley, tier 3 – small part of site) ● Conservation Area (Lansbury) ● Statutory Listed Buildings (Chrisp Street Market Clock Tower, Grade II; Festival Inn, Grade II; Susan Lawrence and Elizabeth Lansbury School, Grade II, adjacent to site)

Site information	Details
Relevant Permissions	PA/16/01612 - Comprehensive redevelopment of the site with 19 new buildings ranging from 3 to 25 storeys providing 643 residential units, market enhancement, refurbishment of retained Festival of Britain buildings, reconfiguration and replacement of existing and provision of new commercial uses including new cinema, alterations and additions to existing Idea Store, flexible affordable workspace/ community space, office space, retail, financial and professional services and café/restaurant floor space, public house, hot food takeaway; upgrade and provision of new public open space including child play space.

Site proposal	Details
Indicative capacities	650 homes 20,000sqm of town centre and community uses
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use scheme combining residential uses with an enhanced town centre combining retail, workspace, community and cultural uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Leisure uses, such as a cinema (Sui generis)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Idea Store re-provision
 - Youth centre re-provision
- Development should deliver a regenerated town centre for Poplar with a range of unit sizes, (including those suitable for independent and small local retailers), a market square and a re-provided Idea Store located on East India Dock Road.
- As part of the site allocation, the market facilities should be re-provided, with associated storage and waste facilities provided.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Maximum height of 88m at the tallest point, which should be located at the southeast corner of the site. Additional taller point located in the section east of Crisp Street at a maximum height of 53m. Heights to step down towards the west and north of the site.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be

protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes the Festival Inn, Clocktower and Poplar Baths and the Lansbury Conservation Area. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site – particularly to Langdon Park, Bartlett Park, Jollys Green, and All Saints DLR station. These should align with the existing urban form and grain to support east-west connectivity and wider permeability. An improved green grid connection should be provided through the centre of the site, with good quality onward connections to green grid routes at Cordelia Street and East India Dock Road.
- Development should ensure sufficient and well-integrated access arrangements for highways and servicing to the district centre and market, and should minimise conflict between pedestrians, cyclists, and motorised vehicles.

Environment and public realm

- Improve the public realm with active site edges, particularly along East India Dock Road and within the district centre.
- The provision of market storage areas should be carefully considered to avoid large areas of dead frontage.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting should be investigated.

24. Leaside

Location

24.1 The Leaside sub-area is located on the eastern side of the borough and forms part of the former London Plan's Lower Lea Valley opportunity area which stretches north comprising the boroughs of Newham and Hackney.

24.2 The London Legacy Development Corporation lies to the east of this area, and is the planning authority for the Fish Island and Bromley by-Bow character places within the borough, as well as Queen Elizabeth Olympic Park and surrounding areas.

24.3 The sub-area is a collection of vibrant and distinctive town centres, transport interchanges and residential areas. The sub-area comprises six distinct character places. The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Vision

24.4 By 2038, the Leaside sub-area will experience comprehensive regeneration and redevelopment of former and underused industrial areas. Connectivity will be transformed with a series of new bridges and riverside walkways across the River Lea, crossings along the A12 and A13, and enhancements to the safety and connectivity of pedestrian and cycle routes through and around industrial areas including Bow Goods Yard, which will integrate existing and new communities in the area.

24.5 The development of the Lea River Park (including the Leaway) will provide a new strategic publicly accessible green space and a series

of new pedestrian and cycling routes, linking the River Lea to London's wider green grid network, including the Lee Valley Regional Park.

24.6 Development in the area will have sufficient transport and social infrastructure to facilitate the creation of thriving mixed communities alongside vibrant neighbourhood centres. Housing provision will be accelerated through the Poplar Riverside Housing Zone and delivered alongside new local employment, enterprise and business opportunities.

Objectives

- a. Improve strategic connections to overcome the physical barriers to movement created by the A12, A13 and the waterways
- b. Deliver the Lea River Park (including the Leaway) to provide a network of interconnected water and open spaces, green walking and cycling routes and improve access to and along the River Lea
- c. Improve local connections by creating a street pattern that increases permeability for ease of pedestrian and cyclist movement
- d. Support existing and new neighbourhood centres by improving accessibility to them to ensure they act as the civic heart of surrounding communities
- e. Contribute towards the delivery of new affordable homes and community facilities through Poplar Riverside Housing Zone regeneration
- f. Optimise former industrial/employment land and protect designated industrial areas whilst sensitively integrating industrial activities into their site context and enhancing the public realm and pedestrian and cycle connectivity.

Site allocations in the Leaside sub-area

3.1 Ailsa Street

3.2 Leven Road

3.3 Aberfeldy Estate

3.4 Bromley by Bow

3.5 Blackwall Trading Estate and Leamouth Road Depot

3.6 Hackney Wick Station

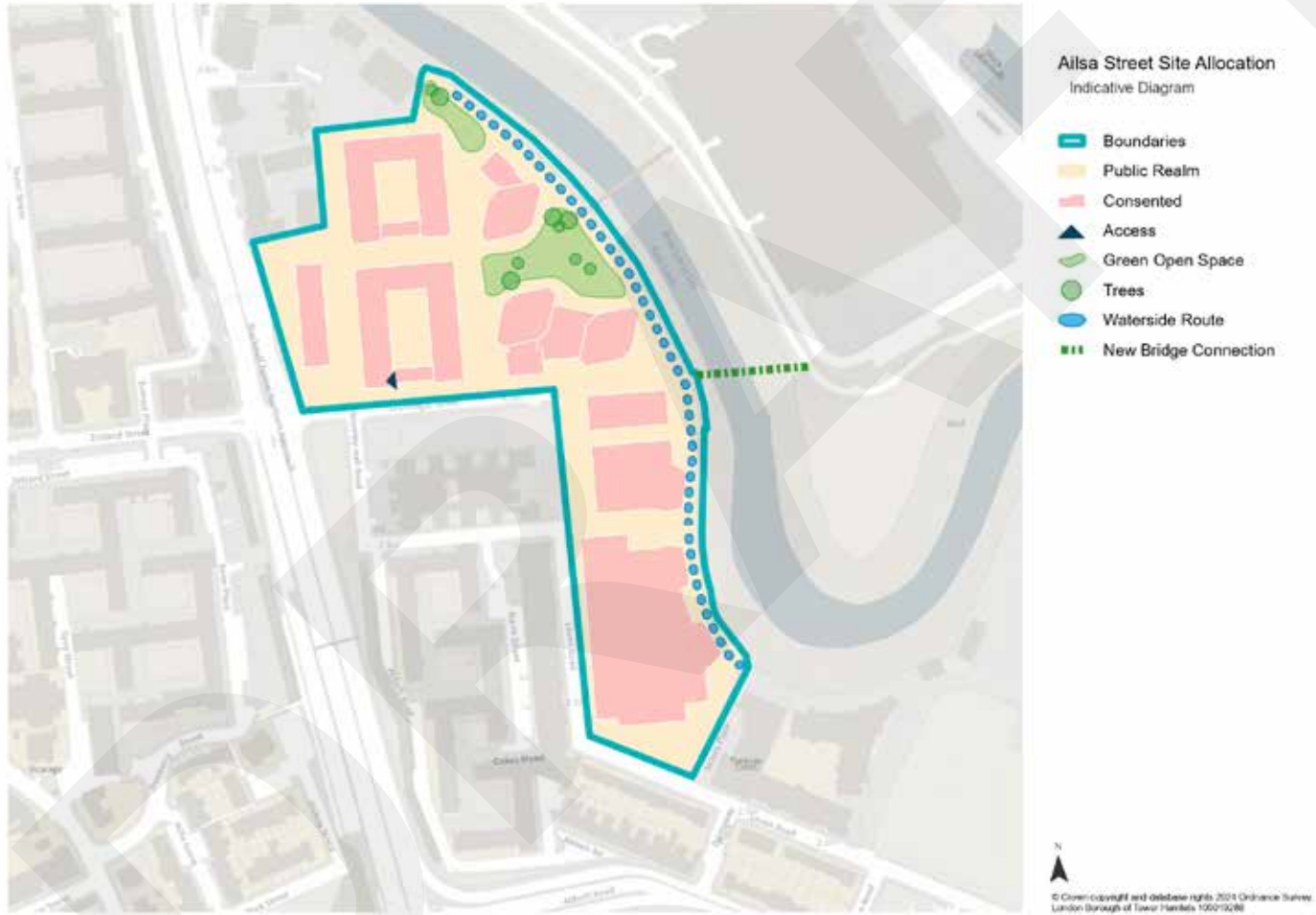
3.7 Hepscott Road

3.8 Sweetwater

3.9 Teviot Estate

3.1 Ailsa Street

Figure 34: 3.1 Ailsa Street (indicative)



Site information	Details
Address	Ailsa Street/Lochnagar Street
Area [ha]	3.90
Ward	Lansbury
PTAL [2031]	1a-3
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (River Thames and Tidal Tributaries, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Safeguarded Waste Site ● Conservation Area (Limehouse Cut, adjacent to the site) ● Statutory listed buildings (Bromley Hall, Grade II*; Poplar Public Library, Grade II; Former Fire Station, grade II, adjacent to the site; Former Bromley Hall School, grade II, adjacent to the site)

Site information	Details
Relevant Permissions	<p>PA/16/02692 – Ailsa Wharf, Ailsa Street - Demolition of existing structures/buildings and the redevelopment of the site for a mixed use scheme providing 785 residential units and 2,954 sqm GIA commercial floorspace within a series of thirteen building blocks varying between 3 and 17 storeys (Maximum height of 59.9m).</p> <p>PA/19/01760 – Islay Wharf, Lochnagar Street - Demolition of existing warehouse building and redevelopment of the site for mixed use development comprising two blocks ranging in height between 12 storeys and 21 storeys, accommodating 351sqm of flexible uses classes, and residential accommodation on the upper floors providing 133 residential units.</p> <p>PA/19/02148 – Former Poplar Bus Depot, Leven Road – Part retention and part demolition of the existing boundary walls and the former tram shed depot arches, and retention of the three storey office building. Demolition of the remainder of the existing warehouse and the redevelopment of the site to provide 530 residential units, 2644sqm of workspace, 508sqm of flexible retail; professional services; and restaurant/bar uses, within buildings ranging from 3 storeys (20.2m) to 20 storeys (72.7m).</p>

Site proposal	Details
Land uses	Small open space, bridge
Indicative capacities	1,450 homes (785 on Ailsa Wharf, 133 on Islay Wharf, 530 on former bus depot) 6,500sqm commercial floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Safeguarded bridge landing space for new crossing of the River Lea
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- Development should facilitate a new or extended bus route through the site to enhance access to public transport.
- Access to public transport and delivery of a walking and cycling bridge across the River Lea will need to be improved in line with

the phasing of development and in coordination with the London Borough of Newham.

- Development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.

Form, massing, and heritage

- Height strategy: Maximum height of 80m at the tallest point, which should be located to the south of Lochnagar Street. Heights should step down away from this point, and particularly towards to A12 in the west of the site.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site - particularly to and along the River Lea to Bromley-by-Bow District Centre, Aberfeldy Neighbourhood Centre and to Langdon Park DLR station. These should align with the existing urban grain to support permeability and legibility. Provide an active and well-defined street frontage along Lochnagar Street, and create a stronger east-west link between the River Lea and the Langdon Park DLR station.
- Development must provide public access along the waterfront at the River Lea. Improved green grid routes should be delivered along the River Lea waterfront and along Lochnagar Street, with good quality onward connections to the adjoining green grid route at Zetland Street and the Teviot Estate site allocation.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- Improve the quality of and create a positive sense of place in the form of an active square at the corner of the A12 and Lochnagar Street.
- Development should step back from the River Lea to avoid excessive overshadowing and provide active frontage on the riverside.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater recycling should be investigated.

3.2 Leven Road

Figure 35: 3.2 Leven Road (indicative)



Site information	Details
Address	Leven Road
Area [ha]	8.06
Ward	Lansbury
PTAL [2031]	1a-2
Planning designations	<ul style="list-style-type: none"> ● Flood risk area ● Site of Importance for Nature Conservation (River Thames and Tidal Tributaries, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3)

Site information	Details
Relevant Permissions	PA/18/02803 – Poplar Gas Holder Site - A hybrid planning application (part outline/part full) comprising: <ol style="list-style-type: none"> 1.) In Outline, a comprehensive mixed-use development comprising a maximum of 195,000 sqm of floorspace for Residential; Business uses including office and flexible workspace; Retail, financial and professional services, food and drink uses; Community, education and cultural uses; A secondary school; Assembly and leisure uses; Public open space including riverside park and riverside walk. 2.) In Full, for 66,600 sqm of residential arranged in four blocks, ranging from 4, 5, 6, 8, 9, 12 and 14 (57.6m) storeys in height, up to 2700 sqm of office and flexible workspaces, up to 500 sqm community and up to 2000 sqm leisure uses, up to 2500 sqm of retail and food and drink uses.

Site proposal	Details
Indicative capacities	2,800 homes 8,500sqm commercial floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses, and provision of a secondary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Secondary school
 - Strategic consolidated open space of minimum 1 hectare
 - Safeguarded bridge landing space for new crossings of the River Lea
- Ensure the open space is designed and usable for sport and recreation and located adjacent to the River Lea, featuring the Leaway and water spaces. It should meet the minimum size of one hectare.
- Development should facilitate a new or extended bus route to serve the site to enhance access to public transport.
- Access to public transport and pedestrian and cycle connectivity across the River Lea will need to be improved in line with the phasing of development and in coordination with London Borough of Newham.
- Open space should be delivered in the earliest phase of development.
- Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on site decontamination requirements caused by the gas works. An

assessment should be carried out to understand the potential contamination on site prior to any development taking place.

- Prior to demolition, the gasholders on the site did not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme.
- Development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.

Form, massing, and heritage

- Height Strategy: Maximum height of 76m at the tallest point, which should be located in the northern part of the site, near the river and the new park. Heights to step down from this point towards the existing lower-rise residential context to the south and east.
- Development should retain and reuse parts of the dismantled gas holder no. 1 within the future development, and reflect the industrial heritage of the site through measures such as, but not limited to, public art, landscaping and building design.

Routes and streets

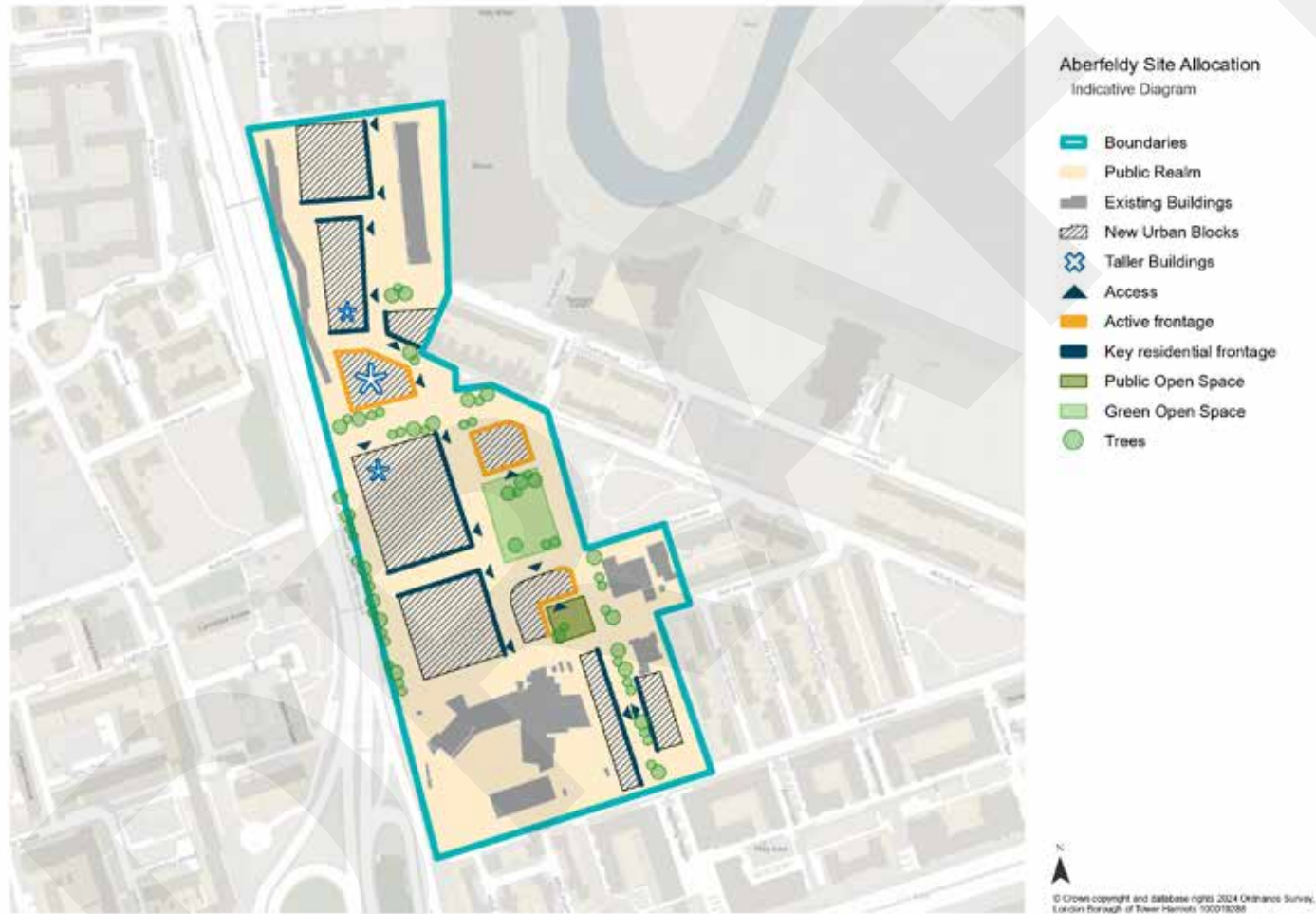
- Improve walking and cycling connections to, from within the site - particularly to link with the River Lea Park walk, Aberfeldy Neighbourhood Centre to Langdon Park DLR station and East India DLR station. Provide safe pedestrian and cycling access to the secondary school. Development must provide public access along the waterfront at the River Lea. Improvements to green grid routes should be delivered through the site and along the River Lea waterfront, with good onward connections provided to green grid routes at Oban Street and Abbott Road, and to the Aberfeldy Estate and Blackwall Trading Estate site allocations.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- Development should step back from the River Lea to avoid excessive overshadowing and enable activation of the riverside.
- Improve the public realm with active site edges, particularly along Leven Road.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater recycling should be investigated.

3.3 Aberfeldy Estate

Figure 36: 3.3 Aberfeldy Estate (indicative)



Site information	Details
Address	Abbott Road/Dee Street
Area [ha]	7.24
Ward	Lansbury
PTAL [2031]	1b-3
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Publicly Accessible Open Space (Aberfeldy Playground; Aberfeldy Millennium Green, Leven Road Park, Braithewaite Park – all adjacent to the site) ● Town centre (Aberfeldy Street neighbourhood centre) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Balfron Tower, adjacent to the site) ● Statutory listed buildings (Former Bromley Hall School, grade II; adjacent to the site)
Relevant Permissions	PA/11/02716 - Outline planning application for the mixed-use redevelopment of the existing Aberfeldy estate comprising: Creation of 1,176 residential units in 15 new blocks between 2 and 10 storeys in height plus 1,743sqm retail space, professional services, food and drink and 1,786 community and cultural uses.

Site proposal	Details
Indicative capacities	1,550 homes 3,500sqm commercial/town centre floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses, and provision of a primary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school expansion (with re-provision of any playing fields, MUGAs, or sports facilities)
 - Community facility (re-provision)
 - Strategic consolidated open space of minimum 1 hectare
- Delivery should be phased so that a revitalised Aberfeldy neighbourhood centre is delivered within the first phase of the programme, to avoid uncertainty for retailers over the status of the centre and to ensure the new centre is embedded in the community as increasing numbers of new residents come to live in the surrounding area. Within the town centre, active frontages and town centre uses should predominate at ground level.
- The site may be appropriate for some small-scale employment uses on the A12 frontage to help manage the hostile roadside environment in terms of noise and air quality for new and existing residents.

- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.

Form, massing, and heritage

- Height Strategy: Maximum height of 80m at the tallest point, which should be located at the northern end of Abbott Road. Heights should step down from this point towards the lower-rise residential context in the east and south of the site, and towards Bromley Hall School to the north of the site.
- A strong built frontage should address the A12 along the site's western boundary. The scale of development along the A12 edge should vary, to avoid a feeling that the estate is presenting a 'wall' to the road and turning inwards. Given the busy nature of this principal urban road, building frontages should step away from the route. This may permit some mitigation measures along the route to be introduced to help delivery better air quality and help manage noise pollution issues.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes ensuring that development does not dominate the listed Bromley Hall School or undermine the setting of, and views towards, Balfron Tower. The prominence of Balfron Tower should be preserved from borough-designated viewpoints. Any tall buildings in these

views must be subservient to Balfron Tower and be located so that they do not disrupt the silhouette of the building on the skyline. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals, and the Tower Hamlets Views and Landmarks Study.

Routes and streets

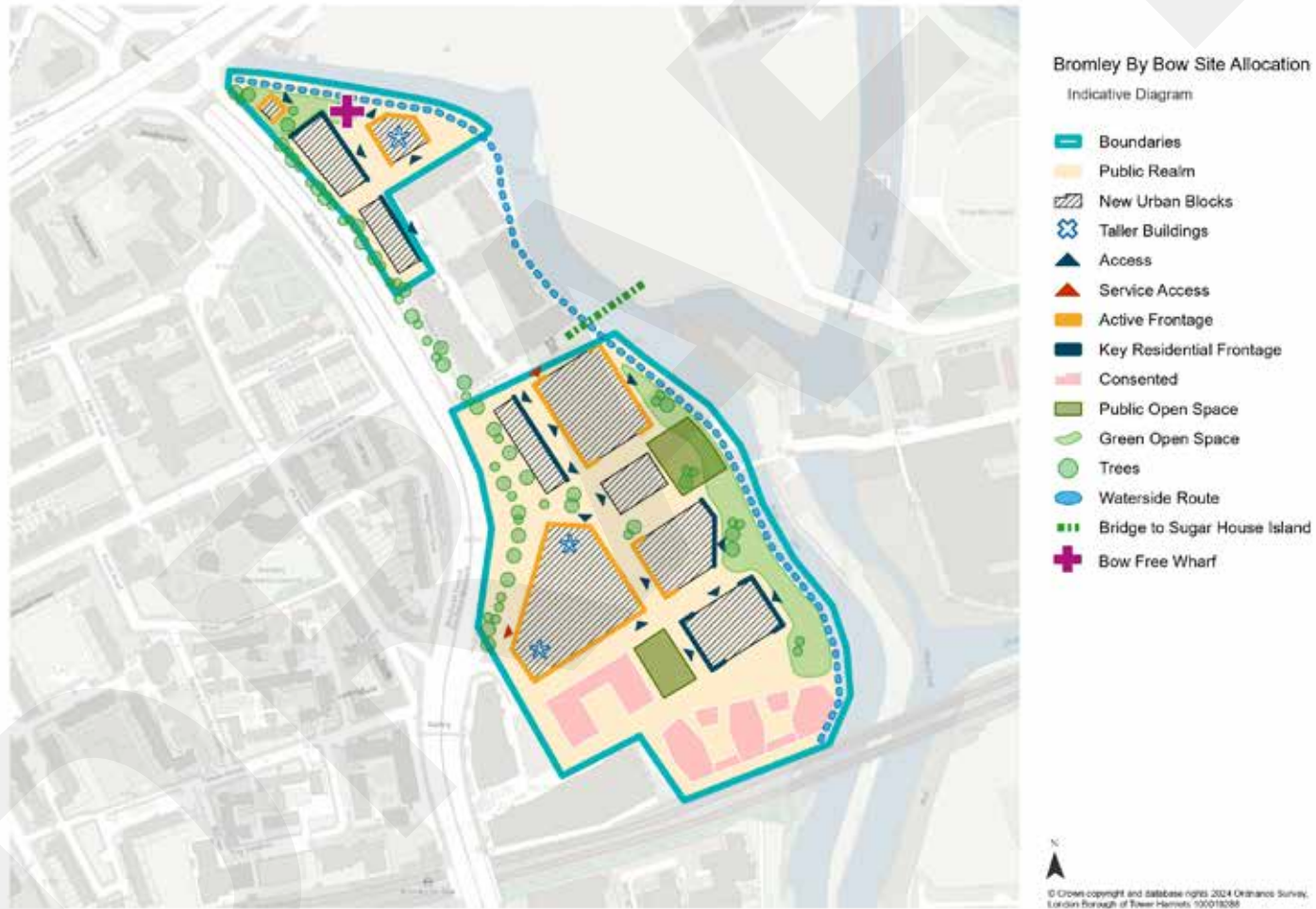
- Improve walking and cycling connections to, from and within the site. These should align with the existing urban grain to support permeability and legibility. The existing complex network of streets and cul-de-sacs should be replaced by a permeable street grid network which fully integrates and makes direct connections with its context creating a stronger and more legible street network across the estate. Improved green grid routes should be delivered along Aberfeldy Street, Blair Street, and Abbott Road, with good onward connections provided to Jolly's Green and green grid routes across the A12 and A13 and towards the Leven Road and Teviot Estate site allocations.
- Aberfeldy Street will be a strong and more legible public route across the estate, which will better establish connections with new development to the south and provide direct connections to the riverside area at the north.

Environment and public realm

- Existing open space at Millennium Green, Leven Road Park, and Braithewaite Park should be retained and improved. There should be a net increase in the overall provision of public open space through redevelopment of the site. Access to the public open space should be improved, alongside improvements to the facilities and quality of the space itself.

3.4 Bromley by Bow

Figure 37: 3.4 Bromley by Bow (indicative)



Site information	Details
Address	Hancock Road/Three Mill Lane
Area [ha]	6.26
Ward	Bromley North
PTAL [2031]	4-6a
Planning designations Page 1020	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Site of Importance for Nature Conservation (Lea Valley, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Three Mills) ● Statutory listed buildings (Tide Mill, grade I; Clock Mill, grade II; Office Opposite Clock Mill, grade II; and Paved Roadway between House Mill and Clock Mill, grade II; all adjacent to the site)
Relevant Permissions	17/00344/FUL – Imperial Street - Development of a mixed-use scheme to include five buildings, ranging between 3 and 14 storeys in height, which would comprise 407 residential units, 339 sqm of employment space, 274 sqm of flexible retail space.

Site proposal	Details
Indicative capacities	1,300 homes (400 on Imperial Street site, 200 on North Bow River Village site, 700 on Tesco site) 20,000sqm commercial/community floorspace

Site proposal	Details
Phasing	2024-29, 2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses, and provision of a primary school, community centre, and improved connections across the River Lea.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school
 - Community centre
 - Safeguarded bridge landings for improved connections across the River Lea
 - Improved A12 junction
 - Strategic consolidated open space of minimum 1.2 hectares
- Proposals will need to include an appropriate mix and balance of uses that together have the potential to function as a District Centre.
- The site is in multiple ownership, and landowners and developers should work together to implement a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- Landing for bridges from Sugar House Lane will need to be incorporated into development proposals. The opportunity to create

a new ped/cycle bridge link over the River Lee Navigation to the regeneration of the Hunts Lane area should be explored.

- This site could potentially be suitable for accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.
- Development must ensure the full operational use of Bow Free Wharf can continue unimpeded, and that new development is designed in such a way that residents will not be exposed to excessive noise or other forms of pollution from the wharf. Vehicle access to the wharf should be designed in such a way as to minimise conflict between wharf uses and residential uses.

Form, massing, and heritage

- Height Strategy: Maximum height of 50m at the tallest point, which should be located to the south of the site, on the Imperial Street plot. Additional points of height of maximum 44m can be located towards the western side of the Tesco site and on the northern part of the site. Building heights should step down towards the east of the site.
- A hard urban edge should be formed along the urban A12 frontage, with builds typically rising to approximately 10 storeys. A softer, more informal and stepped down edge should be formed along the river front - taking proper account of the historic character of the Three Mills Island area.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

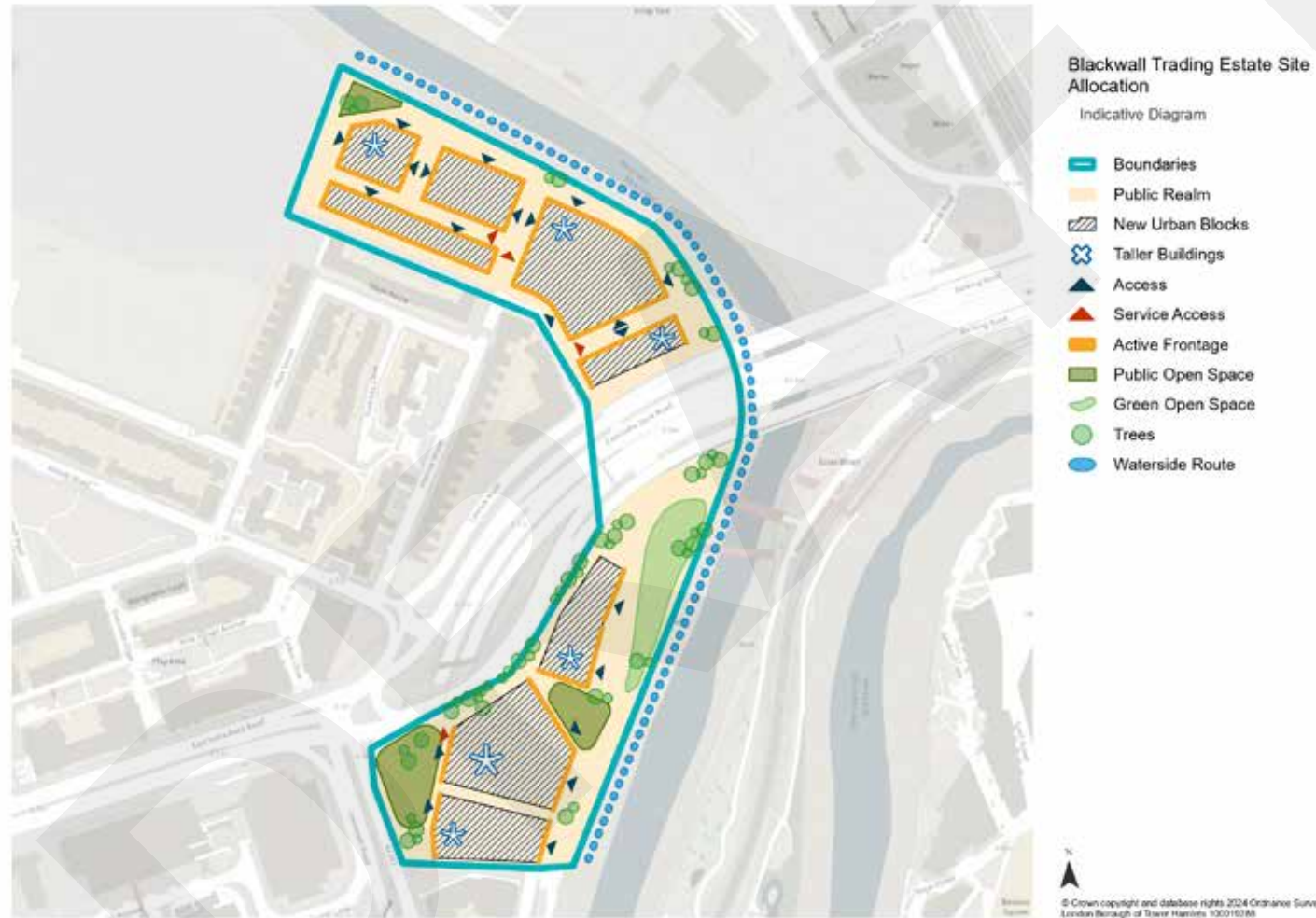
- To maximise the opportunities to deliver a successful new centre and community in this location, improved linkages across the A12 (including through measures to improve safety in the underpasses beneath the A12) and links to the east across the River Lea are essential to improve local and wider connectivity and integration of new and existing communities across the area.
- An improved junction which provides vehicular and pedestrian access from the site to and across the A12 is required, to improve access to the wider Bow area and to Bromley-by-Bow Station. This should include at-grade pedestrian and cycle crossings and the potential to facilitate the 'Bow Vision' bus route, connecting through Bromley-by-Bow to Sugar House Island via a potential new bridge.
- Development must provide public access along the waterfront at the River Lea, and improved access points onto the north canal towpath. Improved green grid routes should be delivered along Three Mills Lane, Imperial Street, and along the River Lea waterfront, with good quality onward connections across the A12 to join the rest of the green grid. Careful consideration should be given as to how to best route the riverside path around Bow Free Wharf to ensure its continued operation.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- High quality new public open spaces should be created along the waterfront, particularly focused on the area where Three Mills Lane crosses the River Lea.

3.5 Blackwall Trading Estate and Leamouth Road Depot

Figure 38: 3.5 Blackwall Trading Estate and Leamouth Road Depot (indicative)



Site information	Details
Address	Leamouth Road/Lanrick Road
Area [ha]	5.10
Ward	Poplar/Blackwall and Cubitt Town
PTAL [2031]	1b-5
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Site of Importance for Nature Conservation (River Thames and Tidal Tributaries, and Bow Creek Ecology Park, both adjacent to the site) ● Local Industrial Location (Blackwall Trading Estate) ● Archaeological Priority Area (Lea Valley, Tier 3; and Limmo, Tier 2) ● Tall Building Zone (Leamouth) ● Statutory listed buildings (Entrance Gateway, grade II; and East India Dock Wall and Gateway, grade II; both adjacent to the site)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	775 homes (375 on depot site, 400 on trading estate site) 35,000sqm non-residential floorspace 6,500sqm replacement depot (if needed)

Site proposal	Details
Phasing	2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential- and light industrial-led scheme, with some potential for other commercial uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Light industrial uses (Class E) – must at least replace the current floorspace
 - Commercial and town centre uses (Class E)
 - Community uses (Class F1/F2)
 - Replacement council depot – if needed (Sui generis)
- Required on-site infrastructure includes:
 - NHS primary health care facility or community facility (as needed)
 - A13 connector bridge – passing underneath the A13
- The site is partly within a Local Industrial Location, and development must provide at least the same amount of light industrial floorspace as currently exists on the site, and this may be secured by condition or other legal agreement as light industrial space in perpetuity.
- The site currently contains a council vehicle depot. This should be reprovided as part of development, unless a separate site elsewhere can be secured for a suitable depot use, in which case the floorspace that is freed-up by the relocation of the depot should be used for additional housing and active ground floor uses.
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is

delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.

Form, massing, and heritage

- Height strategy: Maximum height of 71m at the tallest points, which should be located towards the southern end of the site. Heights should step down towards the centre of the site, and rise up again along the River Thames in the northern part of the site to a maximum of 46-49m in the northwestern part of the site.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals, and the Tower Hamlets Views and Landmarks Study.

Routes and streets

- Improve walking and cycling connections to, from and within the site, particularly along the river and towards the new park and bridge crossings at the Leven Road site allocation, and towards City Island neighbourhood centre and Canning Town town centre and underground station in the London Borough of Newham. These

should align with the existing urban grain where possible to support permeability and legibility, and should connect to the adjacent Leven Road site allocation.

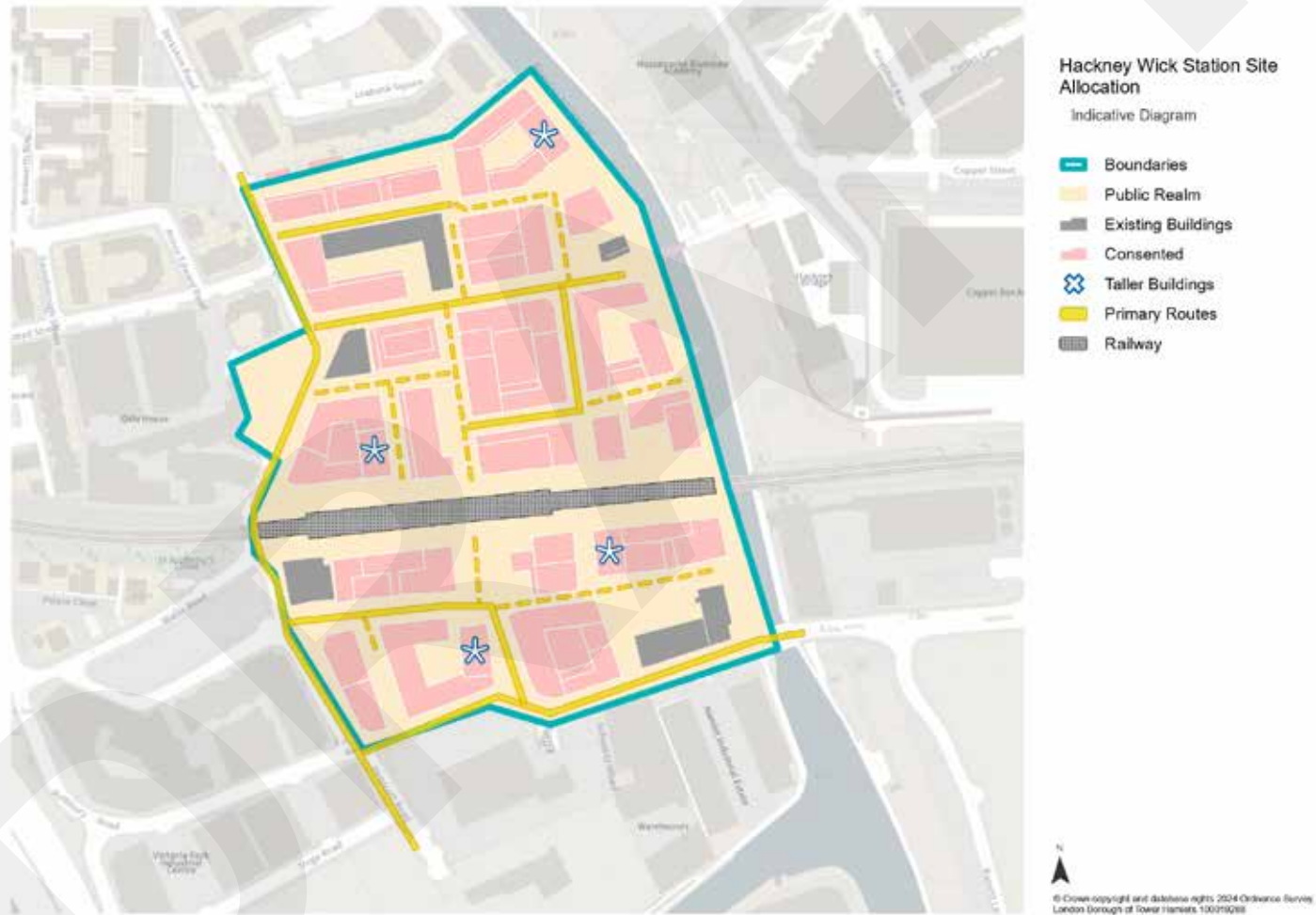
- Land should be secured to provide a connector bridge that runs underneath the A13 to connect both sides of the site, to complete the pathway up the River Lea, and to allow pedestrians and cyclists to travel north and south without needing to cross the busy A13, giving easier access to facilities at Aberfeldy neighbourhood centre and open space on the Leven Road site allocation.
- Development must provide public access along the waterfront at the River Lea. Improved green grid routes should be provided along Oban Street and along the River Lea waterfront, with good quality onward connections towards the green grid at Abbott Road and the Leven Road and Aberfeldy Estate site allocations.
- Vehicle movements around the redeveloped light industrial space and the redeveloped depot should be carefully considered to minimise conflict between pedestrians, cyclists, and motorised vehicles.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- Incorporate a significant amount of riverside public open space, with elements of biodiversity that complement the adjacent Bow Creek Ecology Park Site of Importance for Nature Conservation across the River Lea in the London Borough of Newham.

3.6 Hackney Wick Station

Figure 39: 3.6 Hackney Wick Station (indicative)



Site information	Details
Address	White Post Lane
Area [ha]	6.39
Ward	Bow East
PTAL [2031]	3-4
Planning designations Page 1026	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Site of Importance for Nature Conservation (Lea Valley, adjacent to the site) ● Metropolitan Open Land (Lee Valley Regional Park, adjacent to the site) ● Town centre (Hackney Wick neighbourhood centre) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Fish Island)
Relevant Permissions	16/00166/OUT – Hackney Wick Masterplan - Outline planning application for the demolition of 28,281sqm of existing buildings on site and development of a phased comprehensive mixed use development of up to 119,242sqm floorspace. Residential of up to 78,931sqm to deliver approx. 874 units; Employment of a minimum of 29,908sqm; Retail of up to 4,493sqm; and Community Facilities for a minimum of 381sqm and up to 2,318sqm.

Site information	Details
Relevant Permissions	16/00271/OUT – Queen's Yard - Hybrid planning application comprising outline planning permission for a new theatre providing up to 1,500sqm of floorspace, and detailed planning permission for the demolition of all buildings on site and mixed use redevelopment to provide flexible commercial floorspace, residential, and enhanced public realm. 17/00112/FUL – 55-69 Rothbury Road - Demolition of buildings/structures and redevelopment of the site, comprising the erection of a five-storey building, plus basement level, with a total gross internal floor area of 2630sqm of Class B1 (Business) floorspace with shared amenities and facilities. 22/00095/RMA – Hackney Wick Masterplan - Application for the Approval of Reserved Matters of layout, scale, appearance and landscaping for Plot E/F, Plot J East and Plot K2 North of the Hackney Wick Masterplan to provide 190 residential units, 3,984sqm commercial space and 180sqm community/leisure space.

Site proposal	Details
Indicative capacities	800 homes across the whole site (300 on Tower Hamlets portion of site) 6,500sqm commercial and community floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, employment-focused scheme with a mix of residential, retail, workspace, and creative and cultural uses.
- Acceptable land uses include:
 - Residential (Class C3)
 - Retail/town centre uses (Class E)
 - Employment uses (Class E)
 - Community uses (Class F1/F2)
 - Theatre (sui generis)
- Required on-site infrastructure includes:
 - Community facility
- This is a cross-boundary site with the London Borough of Hackney. Development should coordinate consultation across planning authorities and address cross-boundary issues.
- Proposals on this site should be in accordance with the principles of the Hackney Wick Masterplan.
- Development should deliver a mix of uses around the rebuilt Hackney Wick Station, integrate with established retail frontage at Felstead Street and Prince Edward Road, and utilise buildings of heritage value.
- The overall amount of existing employment floorspace (B Use Class) within the allocation boundary must be maintained, with a

particular emphasis on retaining and providing for creative and cultural industries and any other businesses that are compatible with residential use.

- Queen's Yard will act as a high-quality public space defined by a mixture of cultural and public uses that complement existing uses such as The White Building and the Yard Theatre. In line with policy CI5, development should aim to protect the theatre use on this site.
- Workspace provision should be provided at both upper and ground-floor levels to acknowledge the variety of workspace typologies.
- This site could potentially be suitable for extra-care accommodation.

Form, massing, and heritage

- Height Strategy: Maximum height of 43m at the tallest point, which should be located towards the centre of the site, between White Post Lane and Rothbury Road. An additional taller point of maximum 33m should be located on the Queen's yard site, with heights stepping down around these higher points.
- The impact of development on nearby conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- A new direct and legible north-south connection which structures the heart of the area should be delivered between Wallis Road and Monier Road, integrated with Hackney Wick Station and an improved

bridge over the Hertford Union Canal extending from Roach Road. A fine grain of streets, passageways and yards should be established that should create informal secondary connections to the canal edge.

- Development must provide public access along the waterfront at the Lee Navigation Canal. Improved green grid routes should be provided along the Lee Navigation Canal, with good quality onward connections to the green grid route along the Hertford Union Canal.

Environment and public realm

- Existing streets should be reinforced with strong building edges and active ground floors, and new high quality public realm should be provided throughout the allocation. Queen's Yard should act as a high quality public space defined by a mixture of cultural and other public spaces.

3.7 Hepscott Road

Figure 40: 3.7 Hepscott Road (indicative)



Site information	Details
Address	Hepscott Road/Trego Road
Area [ha]	3.08
Ward	Bow East
PTAL [2031]	3
Planning designations Page 1030	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Site of Importance for Nature Conservation (London's Canals, and Disused Railway, Bow, both adjacent to the site) ● Metropolitan Open Land (Lee Valley Regional Park, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Fish Island and White Post Lane)

Site information	Details
Relevant Permissions	<p>16/00451/OUT - Hybrid' planning application for mixed-use redevelopment of 2.88ha site comprising: up to 39 new/refurbished buildings/blocks to provide for a mix of land uses comprising: Residential (475 units); Commercial and Community Uses (up to 11,018sqm).</p> <p>17/00225/FUL - Application for full planning permission for demolition of the existing building and erection of a new building ranging between one and six storeys in height to provide 1,915sqm of commercial floorspace at ground and lower-ground floor level and 52 residential units on the upper floors.</p>

Site proposal	Details
Indicative capacities	525 homes 11,000sqm commercial and community floorspace
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, and creative and cultural uses, and delivery of a linear park and crossings of the canal.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Improved crossing of the Hertford Union Canal
 - Strategic consolidated open space of at least 1.2ha
- Development should enable the delivery of improved or new north-south connections across the canal
- This site could potentially be suitable for extra-care accommodation.

Form, massing, and heritage

- Height Strategy: maximum height of 32m, with buildings varying in height across the site.
- The impact of development on nearby conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Development should provide new walking and cycling routes through the site providing connections to the Hertford Union Canal towpath, Roach Point Bridge, and Hackney Wick Station. Development must provide public access along the waterfront at the Hertford Union Canal. Improved green grid routes should be provided along the Hertford Union Canal waterfront, with good quality onward connections to the rest of the green grid network, including along the Lee Navigation Canal.

Environment and public realm

- Development should respond positively to the waterside setting, enhance the character of the canal and enhance strategic views west towards central London.
- Proposals should provide a high-quality frontage and deliver public realm improvements to Wansbeck Road.

3.8 Sweetwater

Figure 41: 3.8 Sweetwater (indicative)



Site information	Details
Address	Carpenters Road/Bassett Lane
Area [ha]	11.16
Ward	Bow East
PTAL [2031]	1b-3
Planning designations	<ul style="list-style-type: none"> ● Site of Importance for Nature Conservation (Lea Valley, adjacent to the site) ● Metropolitan Open Land (Lee Valley Regional Park, adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Fish Island)

Site information	Details
Relevant Permissions	<p>11/90621/OUTODA – Sweetwater masterplan - Comprehensive, phased, mixed use development within the future Queen Elizabeth Olympic Park.</p> <p>13/00508/REM - Application for the approval of reserved matters for hard and soft landscaping for Canal Park.</p> <p>16/00039/REM – Reserved Matters application for the provision of a two form entry primary school, as well as playing field and associated changing rooms.</p> <p>21/00069/REM – Sweetwater Phase 4 - Application for the approval of reserved matters for the development of 373 residential units, 452sqm retail floorspace, 733sqm employment floorspace, a 493sqm nursery and a 896sqm space for library use and community use.</p> <p>21/00042/REM – Sweetwater Phase 5 - Application for the approval of reserved matters for the development of 399 residential units, a 1,257sqm health centre or retail floorspace, 584sqm retail floorspace and 272sqm flexible retail/employment floorspace.</p>

Site proposal	Details
Indicative capacities	775 homes 4,500sqm commercial and community floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, and community uses, and provision of a library, nursery, health care facility, and bridges across the canal.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Library
 - HS primary health care facility
 - Nursery
 - Provision of bridges across the Lee Navigation Canal
 - Retention and improvement of existing open space
- New bridge links should be provided across the Lee Navigation that align with the street pattern of Hackney Wick and Fish Island, in order to provide improved access to amenities, movement routes, and transport infrastructure for new residents.
- This site could potentially be suitable for extra-care accommodation.

Form, massing, and heritage

- Height Strategy: Maximum height of 43m at the tallest point, which should be located in the northeastern part of the site. Heights should step down gradually towards the south of the site.
- The impact of development on nearby conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

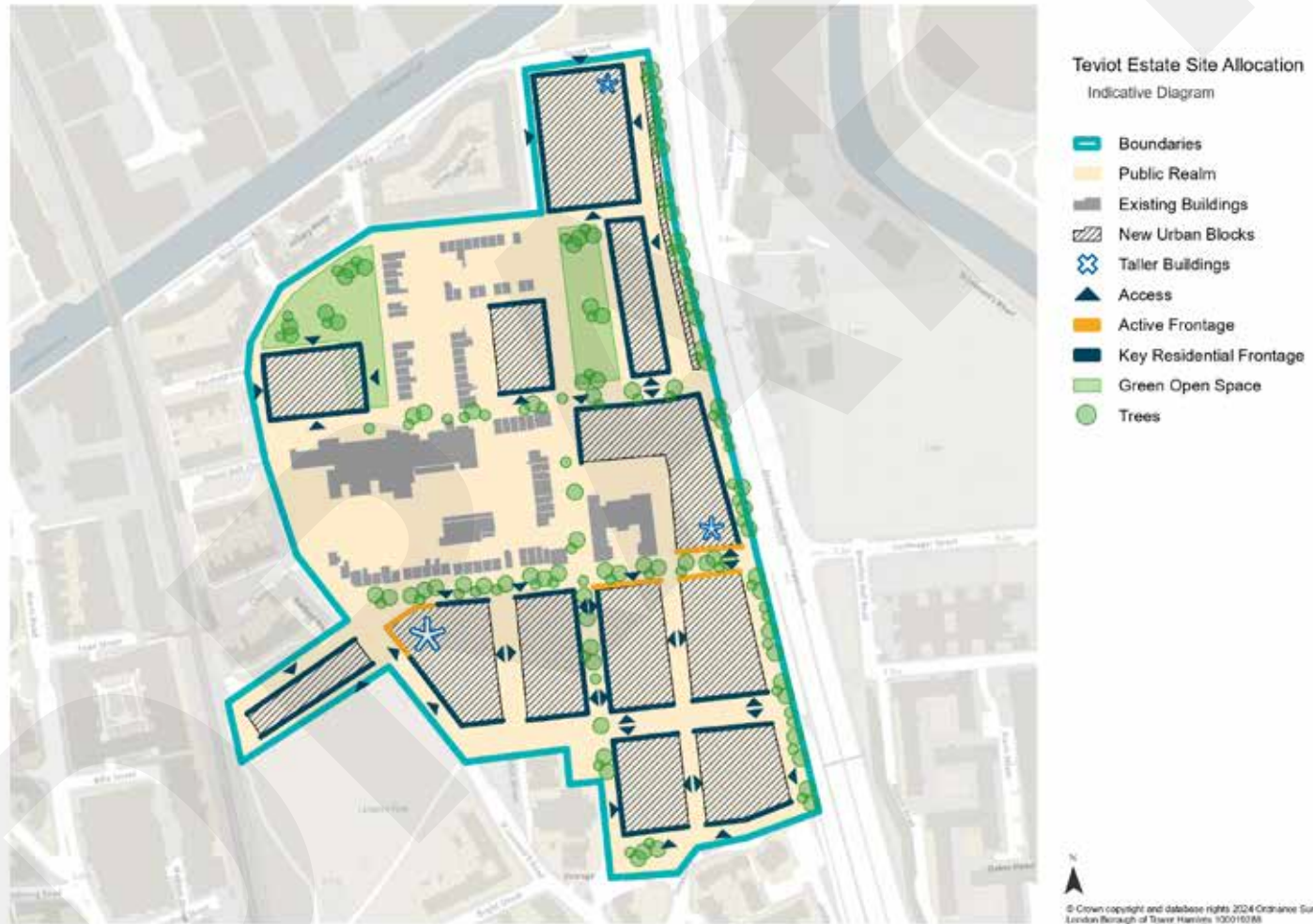
- Development should support the continuation of direct east-west connections from Hackney Wick and Fish Island to the primary school that has already been delivered in the southern part of this site and Queen Elizabeth Olympic Park. Development must provide public access along the waterfront to the east and west of the site.

Environment and public realm

- Active ground floor frontages and high quality public realm should be provided along east-west routes that cross the allocation.

3.9 Teviot Estate

Figure 42: 3.9 Teviot Estate (indicative)



Site information	Details
Address	Teviot Street/Zetland Street
Area [ha]	10.08
Ward	Lansbury
PTAL [2031]	2-4
Planning designations Page 1036	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (London's Canals, adjacent to the site) ● Metropolitan Open Land (Lee Valley Regional Park, adjacent to the site) ● Publicly Accessible Open Space (Wyvis Street Open Space; and Langdon Park – adjacent to the site) ● Archaeological Priority Area (Lea Valley, Tier 3) ● Conservation Area (Langdon Park; and Limehouse Cut and Balfron Tower, adjacent to the site) ● Statutory listed buildings (Church of St Michael and All Angels, grade II; and War Memorial, grade II)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	1,200 homes 5,000sqm commercial/community floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses, and provision of a primary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school expansion (with reprovision of any playing fields, MUGAs, or sports facilities)
 - Community facility
 - Improvements to existing open spaces at Langdon Park and Uamvar Street
 - Safeguarded landing space for bridge across Limehouse Cut Canal
- A cluster of local retail and community uses could be reprovided along Zetland Street from the current location on Teviot Street.
- This site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities – in such circumstances, planning use class C2 may also be acceptable on this site, but only for these uses.

Form, massing, and heritage

- Height Strategy: Maximum height of 50m at the tallest point, which should be located in the western end of the site near Langdon Park. Along the A12, buildings should reach a maximum height of 36-39m. Heights should step down away from these points.
- A strong built frontage should address the A12 along the site's eastern boundary. The scale of development along the A12 edge should vary, to avoid a feeling that the estate is presenting a 'wall' to the road and turning inwards. Given the busy nature of this principal urban road, building frontages should step away from the route. This may permit some mitigation measures along the route to be introduced to help deliver better air quality and help manage noise pollution issues.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes ensuring that development does not undermine the setting of, and views towards, Balfron Tower. The prominence of Balfron Tower should be preserved from borough-designated viewpoints. Any tall buildings in these views must be subservient to Balfron Tower and be located so that they do not disrupt the silhouette of the building on the skyline. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals, and the Tower Hamlets Views and Landmarks Study.

Routes and streets

- Improve walking and cycling connections to, from and within the site. These should support permeability and legibility. In particular, improving east-west permeability is a priority, with redevelopment of the estate enabling the establishment of smaller street blocks and a more open and connected set of streets. Development must provide improved public access to the waterfront at the Limehouse Cut Canal. Improved green grid routes should be delivered along Zetland Street and St Leonard's Road, with good quality onward connections to Langdon Park, and to adjoining green grid routes at Chrisp Street across the DLR tracks and at Lochnagar Street across the A12 in the Ailsa Street site allocation.

Environment and public realm

- Opportunities should be sought to extend and improve Langdon Park in its current location by ensuring that all of the park's edges are addressed by good quality frontage. Improved public open space and public realm should also be provided towards the north of the estate, around the community centre.

25. Isle of Dogs and South Poplar

Location

25.1 The Isle of Dogs and South Poplar sub-area is located to the south-east of the borough, bounded by the River Thames to the south, River Lea and the London Borough of Newham to the east, and East India Dock Road to the north.

25.2 The sub-area falls within the London Plan's Isle of Dogs and South Poplar opportunity area.

25.3 The sub-area is a collection of vibrant and distinctive town centres, employment hubs, transport interchanges and residential areas. The sub-area comprises eight distinct character places (see Figure 36). The Tower Hamlets Urban Structure and Characterisation Study provides further information on the key elements of the local character of each place.

Vision

25.4 By 2038, the Isle of Dogs and South Poplar will have a cohesive mix of housing, employment and leisure uses within distinctive, inclusive and vibrant neighbourhoods, which have a strong sense of place.

25.5 South Poplar will be integrated with neighbouring areas in the Isle of Dogs, capitalising on the opportunities in Canary Wharf and Blackwall. New development at Canary Wharf will reinforce and strengthen its role as a global commercial and business centre. There will be additional local employment opportunities in South Poplar and Isle of Dogs to support a range of flexible start-ups and small-to-medium enterprises.

25.6 Development will be of exemplary quality and capable of accommodating densities to support sustainable places and reinforce local character, where appropriate. This will result in a greener and more attractive living and working environment, befitting the waterfront setting.

25.7 Canary Wharf's role as a Metropolitan Centre will expand and diversify to meet the needs of the wider area. Redevelopment of sites will also support revitalised town centres (including new neighbourhood centres at South Quay and London City Island) and a range of functions, such as community facilities and play spaces.

25.8 The opening of the Elizabeth line will facilitate the provision of new homes and jobs to serve both existing and future communities. New and enhanced connections across strategic roads, docks and the River Thames, together with public realm improvements, will enhance walking and cycling across the area. Further improvements to the sustainable transport network (including enhancements to the Docklands Light Railway and river-based services) will allow people to better access jobs, services and visitor attractions.

Objectives

- a. Support the delivery of high quality interconnected places which respond to local heritage assets and the area's distinctive character
- b. Address severance across the area and to surrounding areas through connectivity enhancements as well as new linkages over the waterways and road network
- c. Manage development intensification and associated impacts on the environment and existing communities

- d. Support vibrant and mixed town centres through enhancing the commercial and office employment offer in Canary Wharf as well as a range of flexible small-to-medium enterprises in surrounding areas
- e. Deliver new and improved open and water spaces, which are accessible and well integrated into new development
- f. f. Improve the transport network and secure the necessary strategic and local infrastructure, such as schools, health and community facilities.

Site allocations in the Isle of Dogs and South Poplar sub-area

- 4.1 Aspen Way
- 4.2 Billingsgate Market
- 4.3 Crossharbour
- 4.4 Limeharbour
- 4.5 Marsh Wall East
- 4.6 Marsh Wall West
- 4.7 Millharbour
- 4.8 North Quay
- 4.9 Reuters
- 4.10 Riverside South
- 4.11 Westferry Printworks
- 4.12 Wood Wharf
- 4.13 10 Bank Street
- 4.16 Westferry/Park Place

4.1 Aspen Way

Figure 43: 4.1 Aspen Way (indicative)



Site information	Details
Address	Aspen Way
Area [ha]	5.48
Ward	Poplar
PTAL [2031]	3-5
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Flood risk area ● Area of deficiency of access to nature ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Poplar) ● Archaeological Priority Area (Isle of Dogs, tier 3; and Poplar, tier 2) ● Conservation Area (St Mathias Church) ● Statutory listed buildings (New City College, Grade II)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	780 homes 21,000sqm educational floorspace 2,000sqm other non-residential floorspace
Phasing	2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the reprovision of a college, community centre, football pitches, and transport depot.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
 - Transport facilities (Sui generis)
- Required on-site infrastructure includes:
 - Reprovision of college
 - Reprovision of community centre and associated football pitches (of at least equivalent quality and size as the current football pitches on site)
 - Reprovision of DLR depot
 - Improved pedestrian crossing over Aspen Way
 - Strategic consolidated open space of minimum 1 hectare
- Development should enable the continued use of the existing depot.
- Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD. This has been developed between landowners and the council in order to positively address the social, economic and environmental disparities between Poplar and Canary Wharf.
- Where landowners and developers can reach agreement on potential land swaps, different options for massing and layout of the site may be acceptable.

Form, massing, and heritage

- Height Strategy: Maximum height of 91m at the tallest point, which should be in the southern-central portion of the site. Heights should step away from this point to the east and west, and should step away significantly towards the existing lower scale residential context to the north.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from north and northwest.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. The setting of adjacent housing should also be protected through appropriate screening and landscaping. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Address the physical barriers and poor connectivity created by Aspen Way, with new and improved walking and cycling routes. This could be facilitated through the provision of improved connections, including new bridges or decking across Aspen Way connecting the site to the Billingsgate Market and North Quay sites.
- Strengthen walking and cycling connections to Poplar DLR station, Poplar High Street, East India Dock Road and Canary Wharf station. Green grid improvements should be delivered along Poplar High Street and through the site towards Poplar DLR station, with good quality onward connections to Poplar Recreation Ground and across Aspen Way.

Environment and public realm

- Create a positive sense of place with a public square and public green open space that integrates north-south links and Poplar DLR station, and improve the quality of spaces around and between buildings and movement through the area.
- Across the South Poplar Masterplan area, development should coordinate to manage surface water to enable discharge into the docks to the south.

4.2 Billingsgate Market

Figure 44: 4.2 Billingsgate Market (indicative)



Site information	Details
Address	Trafalgar Way
Area [ha]	5.75
Ward	Canary Wharf
PTAL [2031]	4-6a
Planning designations Page 1044	<ul style="list-style-type: none"> ● Area of substandard air quality ● Skyline of Strategic Importance ● Flood risk area ● Tower Hamlets Activity Area ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Statutory listed buildings (Quay Walls, Copings and Buttresses to Import Dock and Export Dock, Grade I; Accumulator Tower, Grade II)
Relevant Permissions	None

Site proposal	Details
Indicative capacities	3,000 homes 66,000sqm commercial floorspace 23,000sqm retail floorspace
Phasing	2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses.
- Acceptable land uses include:
 - Residential (Class C3) – maximum 75% of floorspace
 - Town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
 - Warehousing/freight facilities (Sui generis)
- Required on-site infrastructure includes:
 - Community centre
 - Improved pedestrian crossing over Aspen Way
- The operations of Billingsgate Market should be appropriately re-provided at a suitable location within London.
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.
- Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD. This has been developed between landowners and the council in order to positively address the social, economic and environmental disparities between Poplar and Canary Wharf.
- An assessment should be carried out to understand the potential contamination on site prior to any development taking place.

Form, massing, and heritage

- Height Strategy: Maximum height of 181m at the tallest point, which should be located in the western portion of the site, with additional taller points on either side with maximum heights of 151m and 142m.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from north.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to, from and within the site, particularly with a new east to west cycle route through the site. Walking and cycling routes should integrate the site with Poplar to the north; North Quay and Canary Wharf Elizabeth line station; and to the wider area. These routes should align with the existing urban grain to support permeability and legibility. Development must provide public access along the waterfront at North Dock. Green grid improvements should be delivered along the waterfront at North Dock, with good quality onward connections to green grid routes through the Wood Wharf and North Quay allocations.

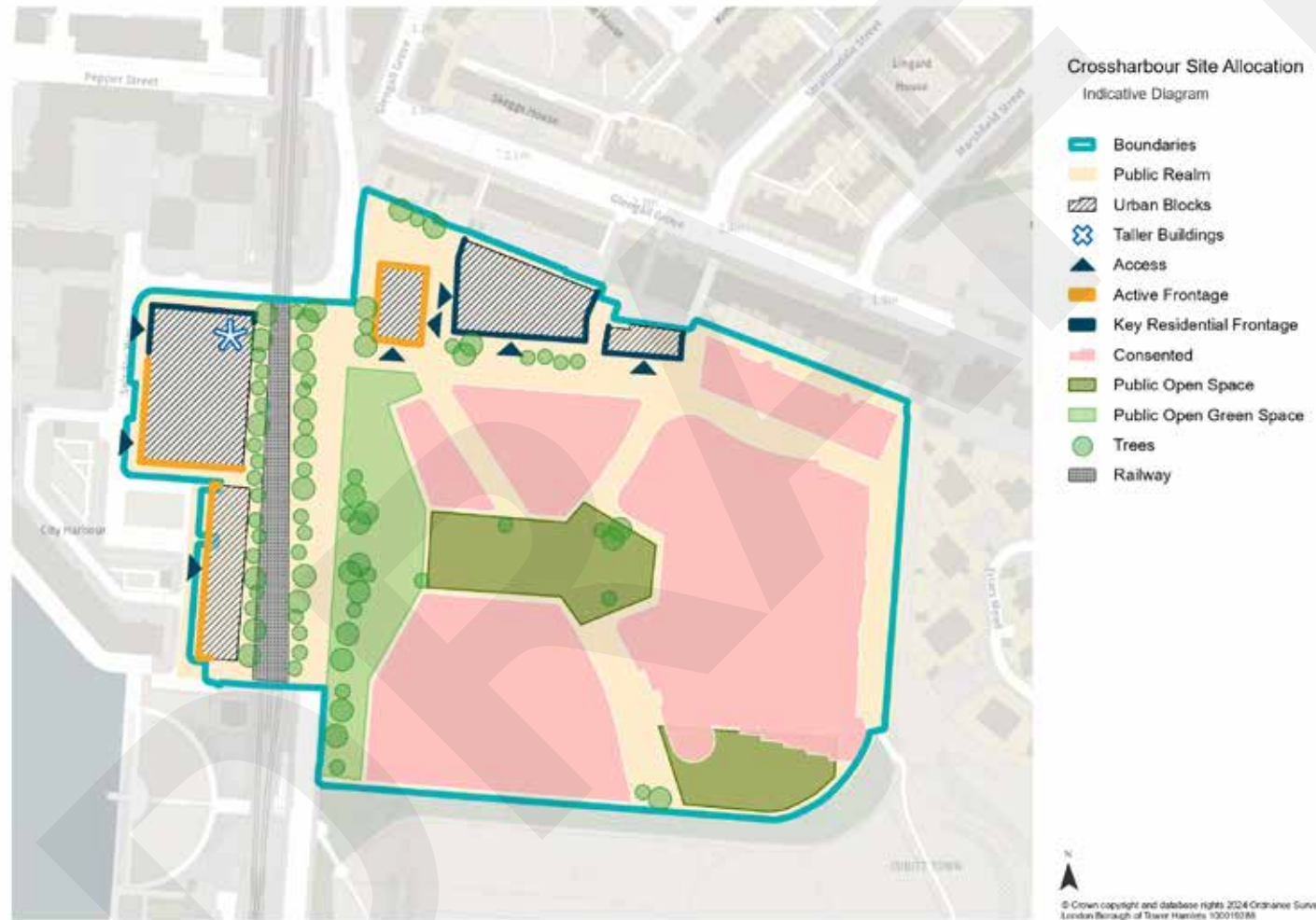
- Address the physical barriers and poor connectivity created by Aspen Way, with new and improved walking and cycling routes. This could be facilitated through the provision of improved connections, including new bridges or decking across Aspen Way connecting the site to the Billingsgate Market and North Quay sites.
- New public routes should be established – with one central primary east-west connection through the centre of the site together with further east-west routes at the northern and southern site boundaries. In addition, as the site widens to the east, multiple new connections should be established with Trafalgar Way.

Environment and public realm

- Provide publicly accessible open space of at least 0.4 hectares in size, which should be easily accessible from across the site and connected to the green grid route along the waterfront.
- Development should prevent excessive overshadowing and enable activation of the dockside by stepping back development from North Dock.
- Enhance legibility and have a clear distinction between public and private spaces, by way of improving public realm particularly along the dockside, providing a continuous walkway with supporting active ground floor uses and frontages, and address the severance caused by Trafalgar Way.
- Great care will need to be taken to ensure the quality of environment and public realm is appropriately high and fully accessible in view of the need to address level changes and the need to link to the northern prospect of a public connection across Aspen Way.
- Across the South Poplar Masterplan area, development should coordinate to manage surface water to enable discharge into the docks to the south.

4.3 Crossharbour

Figure 45: 4.3 Crossharbour (indicative)



Site information	Details
Address	East Ferry Road
Area [ha]	6.15
Ward	Blackwall and Cubitt Town
PTAL [2031]	1b-5
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Critical Drainage Area (part of the site) ● Flood risk area ● Local Nature Reserve (Mudchute Farm and Park, adjacent to the site) ● Site of Importance for Nature Conservation (Mudchute Farm and Park, adjacent to the site) ● Metropolitan Open Land (Mudchute, adjacent to the site) ● Town Centre (Crossharbour District Centre) ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)
Relevant Permissions	PA/19/02534/A1 – A hybrid planning application (part detailed, part outline) for the comprehensive, mixed-use, re-development of the site. Full details for 526 residential units, flexible commercial floorspace, including a new foodstore, a primary school, community uses.

Site proposal	Details
Indicative capacities	2,500 homes (2,000 on Asda site) 24,000sqm commercial floorspace (17,000sqm on Asda site)
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the provision of a health centre, primary school and community centre.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - NHS primary health care facility (reprovision and expansion)
 - Primary school
 - Community centre
 - Transport interchange
- Develop and improve the town centre with an anchor supermarket and a range of retail, leisure and community uses with sizes which can support independent providers. A new supermarket should be provided before the existing supermarket is redeveloped to ensure a continued service for local people. Within the town centre, active frontages and town centre uses should predominate at ground level.
- Delivery of new routes and the public square should be prioritised within the phasing timetable.

Form, massing, and heritage

- Height Strategy: Maximum height of 115m at the tallest point, which should be located on the eastern side of East Ferry Road. On the western side of East Ferry Road, a maximum height of 85m at the northern part of the site, with heights stepping down towards the south. Heights should step down toward the edges of the site in response to existing residential and the park.
- Protect and enhance the setting of the Maritime Greenwich world heritage site.

Routes and streets

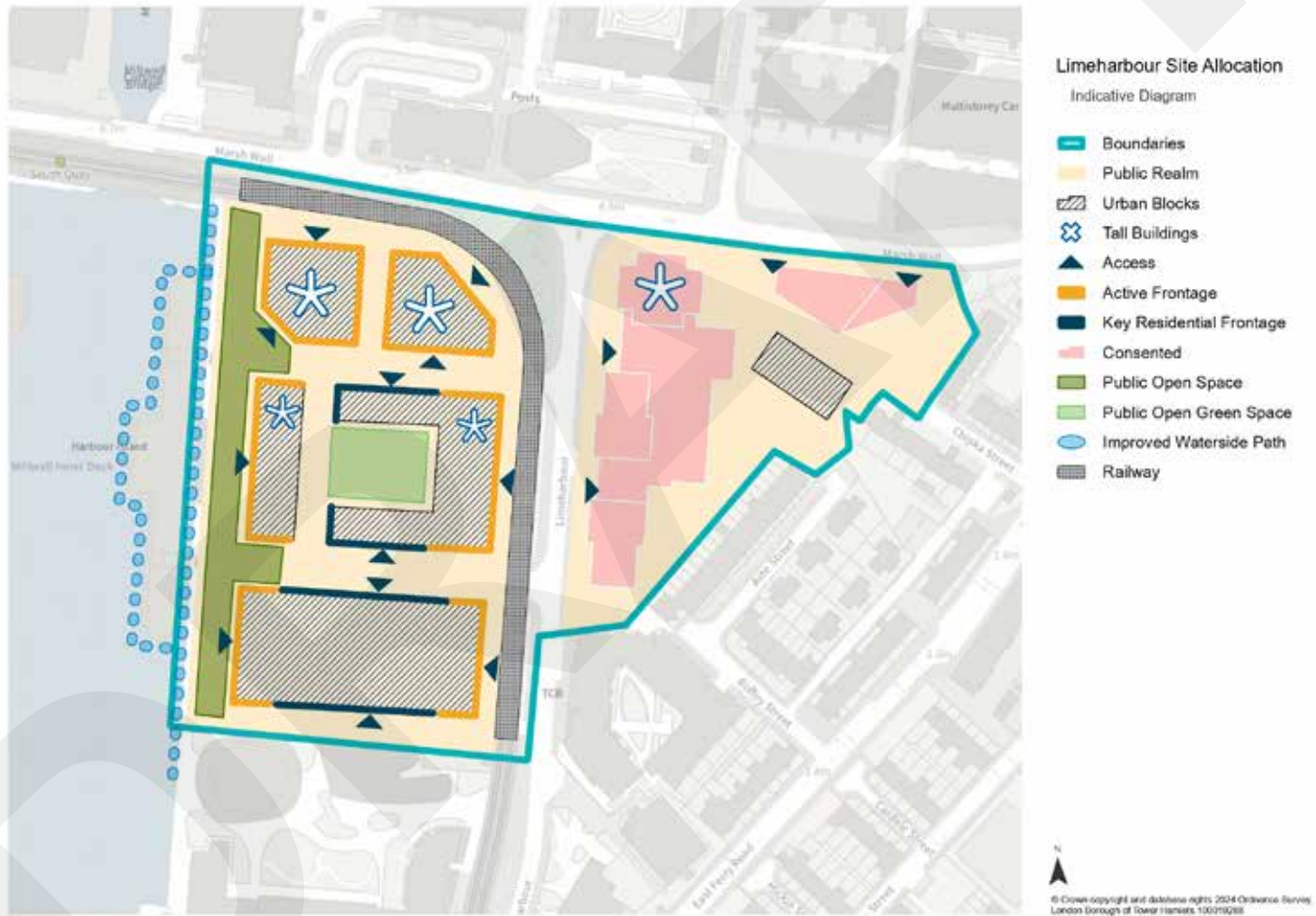
- Improve walking and cycling connections to, from and across the site to establish connections to the new public square, Crossharbour DLR station and Mudchute Park. These routes should acknowledge the existing urban grain to support permeability and legibility. On the eastern side, pedestrian connections established with Glengall Grove would help local permeability. On the western side, the alignment of the DLR line means that additional connections and linkages cannot be made although the alignment of Selsdon Way should be retained. Improved green grid connections should be delivered through the site, with good quality onward connections to green grid routes along Glengall Grove and Pepper Street.

Environment and public realm

- Improve public realm with active site edges, particularly along East Ferry Road and adjacent to Mudchute Park, and reinforce and complement local distinctiveness and create a positive sense of place with the provision of a new public square in the centre that is framed by the development.

4.4 Limeharbour

Figure 46: 4.4 Limeharbour (indicative)



Site information	Details
Address	Limeharbour
Area [ha]	5.25
Ward	Blackwall and Cubitt Town
PTAL [2031]	3-4
Planning designations Page 1050	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Critical Drainage Area (part of the site) ● Flood risk area ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)
Relevant Permissions	PA/17/01597 – Construction of a new mixed use development consisting of five buildings ranging from ground plus 3 to ground plus 48 storeys in height comprising 579 residential units; a two-form entry primary school with nursery facilities; a 10,272 sq. m SME Business Centre; 2,228 sq. m of flexible commercial floorspace (Resolution to grant permission).

Site proposal	Details
Indicative capacities	1,900 homes (approximately 1,250 across whole Harbour Exchange site, remainder on Skylines site) 39,000sqm commercial floorspace
Phasing	2024-29, 2030-34, 2035-39

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with some employment spaces.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community centre
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

Form, massing, and heritage

- Height Strategy: Maximum height of 167m at the tallest point, which should be located in the north of the site, along Marsh Wall, east of Limeharbour. Additional taller points to the west of Limeharbour along Marsh Wall at maximum heights of 124m and 115m. Height should step down towards the southern end of the site.
- Create a series of buildings scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall and Limeharbour. Massing should be varied so as to avoid creating a canyon-like environment along Marsh Wall.
- Protect and enhance the setting of the Maritime Greenwich world heritage site and the historic dockside promenade.

Routes and streets

- Create a legible, permeable and well-defined movement network through the site, centred on Limeharbour, Marsh Wall, and the path along Millwall Inner Dock, and connected to the surrounding existing street network and docksides, and to the proposed new bridge crossing to the north. Maintain the existing route alignments across Harbour Exchange Square, to ensure permeability of the site.
- Improve walking and cycling connections to, from and within the site – particularly between Oakland Quay and Limeharbour; Limeharbour and East Ferry Road; and between the dock sides, Canary Wharf Metropolitan Centre and Mudchute Park. These routes should align with the existing urban grain to support permeability and legibility. Development must provide access along the waterfront at Millwall

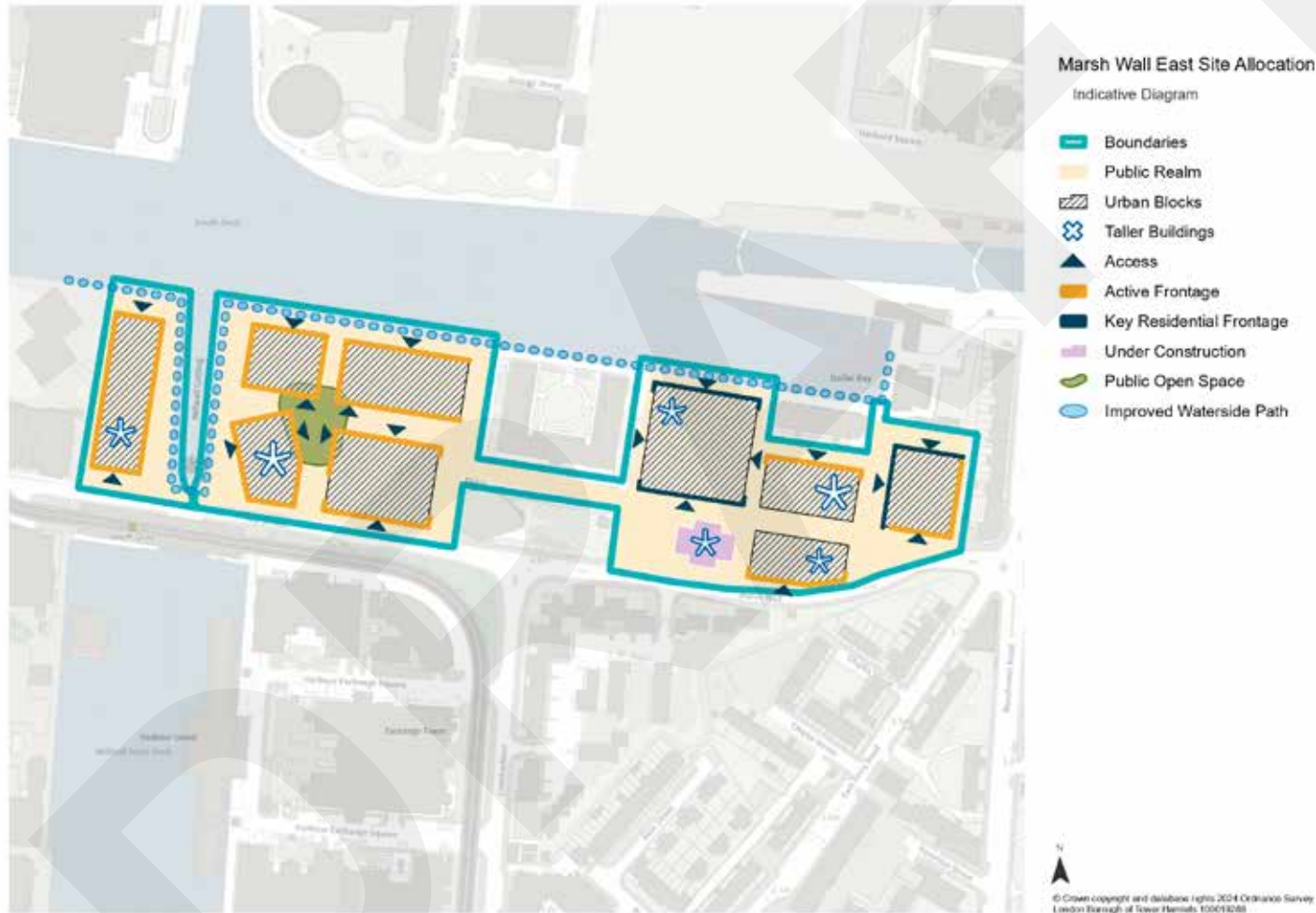
Inner Dock. Improved green grid routes should be provide through the site and between the different parts of the site, with good quality onward connections to adjoining green grid routes such as those on the Marsh Wall East and Marsh Wall West site allocations.

Environment and public realm:

- Integrate buildings with improved public realm and ensure development is stepped back from the docksides with fully accessible active frontages. The priority for improved public realm is the waterfront edge along Millwall Inner Dock, which should provide space for a range of uses and be well-connected to South Quay DLR station.
- Improve the quality of public realm and create a positive sense of place with an arrival point in the form of an active square at the corner of Marsh Wall and Limeharbour.
- Provide well defined public green open space or public squares with active building frontages around the DLR viaduct. The open space should be well integrated into the development.

4.5 Marsh Wall East

Figure 47: 4.5 Marsh Wall East (indicative)



Site information	Details
Address	Marsh Wall
Area [ha]	4.14
Ward	Blackwall and Cubitt Town
PTAL [2031]	3-4
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Skyline of Strategic Importance ● Flood risk area ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Outer Dock) ● Conservation Area (Coldharbour, adjacent to site) ● Archaeological Priority Area (Isle of Dogs, tier 3)
Relevant Permissions	PA/16/02808 – Redevelopment of the site to provide a building of ground plus 48 storey (maximum height 163.08m) comprising 332 residential units; 810 square metres of community floorspace; 79 square metres of flexible retail/restaurant/community.

Site proposal	Details
Indicative capacities	2,400 homes (approximately 1,475 on western half of site, 332 on 225 Marsh Wall site, 585 on rest of eastern half of site) 10,000sqm hotel floorspace 3,300sqm educational floorspace 45,000sqm commercial floorspace 10,500sqm retail floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with some employment spaces, and provision of a primary school and a health facility.
- Acceptable land uses include:
 - Residential (Class C3)
 - Hotel (Class C1)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school
 - NHS primary health care facility
 - Community centre

- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.
- The site contains a number of existing buildings, some constructed fairly recently. When demolition and redevelopment is proposed, applications must robustly justify how they meet circular economy and sustainability principles set out in the rest of the development plan.
- Development of residential uses on the eastern half of the site must demonstrate that they have considered and suitably mitigated against potential noise from the data centre uses within this area, in line with the Agent of Change principle.

Form, massing, and heritage

- Height Strategy: Maximum height of 182m at the tallest point, which should be located towards the west of the site, but to the east of the Millwall Cutting. Heights should step down towards the eastern end of the site, and to the west of the tallest point in order to preserve views of One Canada Square within the Skyline of Strategic Importance.
- Development should maintain the existing block structure whilst respecting its dockside location and surrounding built environment – in particular providing a transition in scale in relation to the lower rise buildings to the south-east and ensure appropriate spacing between

buildings to enable visual permeability between Marsh Wall and South Dock, and variation in heights to avoid the creation of a canyon-like effect along Marsh Wall.

- Create a series of building scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall and Limeharbour.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from south and southeast.
- The impact of development on nearby conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.
- Protect and enhance the setting of the Maritime Greenwich world heritage site and the historic dockside promenade.

Routes and streets

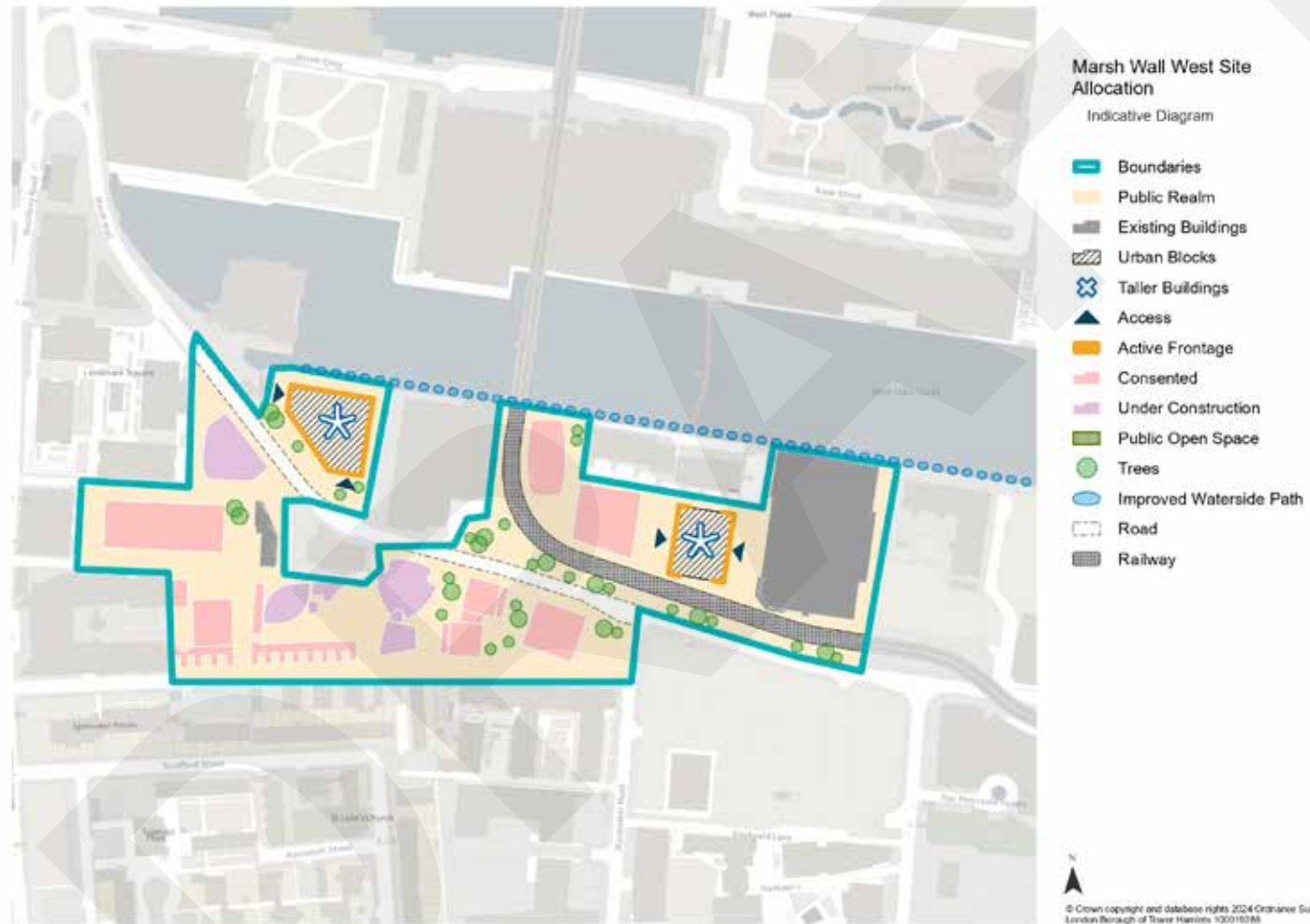
- Create a legible, permeable and well-defined movement network through the site, centred on Limeharbour, Marsh Wall, and the waterfront at South Dock, and connecting to the surrounding existing street network and docksides.
- Improve walking and cycling connections to, from and within the site, particularly to the dockside, Canary Wharf Metropolitan Centre and towards Mudchute Park to the south. These routes should align with the existing urban grain to support permeability and legibility. Development must provide public access along the waterfront at South Dock. Improved green grid routes should be delivered along the waterfront at South Dock, with good quality onward connections provided to green grid routes at Manchester Road, and through the Limeharbour and Marsh Wall Werst site allocations.

Environment and public realm

- Integrate tall buildings with an improved public realm and ensure development steps back from the docksides with fully accessible active frontages, and consider the operational needs of boat operators.
- Provide well-defined public green open space, particularly along the South Dock waterfront and public squares with active building frontages. Good quality public realm and public open space at the base of the tall buildings proposed here will be key for their successful integration into the wider area.

4.6 Marsh Wall West

Figure 48: 4.6 Marsh Wall West (indicative)



Site information	Details
Address	Marsh Wall
Area [ha]	4.94
Ward	Canary Wharf
PTAL [2031]	2-5
Planning designations	<ul style="list-style-type: none"> ● Skyline of Strategic Importance (part of the site) ● Critical Drainage Area (part of the site) ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Publicly Accessible Open Space (Lenanton Steps) ● Town Centre (South Quay Neighbourhood Centre) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)

Site information	Details
Relevant Permissions	<p>PA/15/02671 – 50 Marsh Wall, 63-69 and 68-70 Manilla Street - redevelopment to provide three buildings of 65 (217.5m), 20 (79.63m) and 34 (124.15m) storeys above ground comprising 634 residential units, 231 hotel rooms, provision of ancillary amenity space, a new health centre, a new school, ground floor retail uses.</p> <p>PA/16/01637 – 54 Marsh Wall – construction of two new linked buildings of 41 and 16 storeys comprising 216 residential units; two ground floor commercial units totalling 174 sqm GIA fronting on to Marsh Wall.</p> <p>PA/17/03182 – Jemstock 2 – Minor Material amendment to the planning permission PA/15/02104 which gave consent for the: Erection of building facades to existing structure on site to create a mixed use development comprising 206 serviced apartments, 1,844 sqm of office floorspace and 218sqm of cafe floorspace. Amendments include: increase in the number of serviced apartments from 206 to 250 units.</p>

Site information	Details
	<p>PA/20/02128 – Cuba Street - Erection of single tower block accommodating a high density residential led development with ancillary amenity and play space, along with the provision of a flexible retail space at ground floor, the provision of a new publicly accessible park and alterations to the public highway.</p> <p>PA/20/02588 – 30 Marsh Wall - Demolition of existing building and erection of a single building to provide student accommodation along with flexible retail / commercial floorspace.</p> <p>PA/20/02649 – Quay House – Demolition of the existing building and redevelopment to provide a mixed use development comprising a hotel and serviced apartments.</p> <p>PA/22/00591 – 56-58 Marsh Wall – Demolition of existing buildings and construction of building up to 46 storeys (151.9m) comprising up to 795 co-living units in sui generis use together with communal facilities, non-residential floor space and public realm improvements.</p>

Site proposal	Details
Indicative capacities	<p>2,625 homes (450 on Cuba Street site, 150 on Byng Street/Bellamy Close site, 250 on Britannica hotel site, 650 on Marsh Wall/Manilla Street site, 225 on 54 Marsh Wall site, 500 on Ensign House site, 400 on Beaufort Court site)</p> <p>1,000 student units (30 Marsh Wall site)</p> <p>800 co-living units (56-58 Marsh Wall site)</p> <p>1175 hotel rooms and serviced apartments (225 on Marsh Wall/Manilla Street site, 700 on Quay House site, 250 on Jemstock site)</p>
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with some employment spaces.
- Acceptable land uses include:
 - Residential (Class C3)
 - Town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community centre
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

Form, massing, and heritage

- Height strategy: Maximum height of 230m at the tallest point, which should be on the Ensign House site. There should be a variation in heights across the site, with heights generally stepping down towards the west and south of the site.
- Development should maintain the existing block structure whilst respecting its dockside location and surrounding built environment
 - in particular provide a transition in scale in relation to the lower rise buildings to the south-east and ensure appropriate spacing between buildings to enable visual permeability between Marsh Wall and South Dock, and variation in heights to avoid the creation of a canyon-like effect along Marsh Wall.

- Create a series of building scales with a well-articulated built form and skyline, avoiding significant adverse environmental impacts, including overshadowing of adjacent sites either within the area or outside, particularly along the main routes of Marsh Wall.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from the south and west.
- Protect and enhance the setting of the Maritime Greenwich world heritage site and the historic dockside promenade.

Routes and streets

- Create a legible, permeable and well-defined movement network, centred on Millharbour and Marsh Wall. Frequent and public routes connecting South Dock with Marsh Wall should be created and maintained in any redevelopment proposals.
- Improve and enhance walking and cycling connections to, from and within the site, and provide legible and pedestrian friendly connections between and along Marsh Wall and South Quay Walk, particularly from Mastmaker Road to the South Quay footbridge and from Millharbour through a newly proposed footbridge to Upper Bank Street.
- Development must provide public access along the waterfront at South Dock. Improved green grid routes should be delivered along the waterfront at South Dock, and along Byng Street, Manilla Street, and Cuba Street, with good quality onward connections provided to green grid routes towards the Thames Path, Stafford Street, and the site allocations at Millharbour and Marsh Wall West.

Environment and public realm

- Prevent excessive overshadowing of the dockside and enable activation of the waterfront by ensuring development is stepped back from the water, and consider the operational needs of boat operators.
- The pedestrian environment along Marsh Wall axis is currently restrictive. This key street route should be a pedestrian friendly environment. Existing and new routes between the Marsh Wall axis and South Dock should be designed primarily for pedestrians and incorporate landscape and SUDs feature.
- Create open spaces around the DLR that should be well defined by public green space or public squares and active building frontages. Open space is in short supply in this location – with views across the dock basin provide the sense of openness. The public routes and spaces alongside the edges of South Dock should be generous.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use should be investigated.

4.7 Millharbour

Figure 49: 4.7 Millharbour (indicative)



Site information	Details
Address	Marsh Wall/Millharbour
Area [ha]	3.95
Ward	Canary Wharf
PTAL [2031]	2-4
Planning designations Page 1062	<ul style="list-style-type: none"> ● Critical Drainage Area (part of the site) ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Town Centre (South Quay Neighbourhood Centre) ● Tower Hamlets Activity Area ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)

Site information	Details
Relevant Permissions	PA/14/03195 - Building G1, a podium with two towers of 10 - 38 storeys and of 12 - 44 storeys; Building G2, a four floor podium with two towers of 34 and 38 storeys inclusive of podium; Building G3, a tower rising to 44 storeys; and Building G4, a four floor podium with a tower of 31 storeys inclusive of podium. The development provides 1,513 new homes in a mix of units and tenures; a new primary school with nursery facilities; further education uses; 5,820 sqm of flexible commercial floorspace; two new public parks including play facilities.

Site proposal	Details
Indicative capacities	1,700 homes 6,000sqm non-residential floorspace 3,500sqm educational floorspace
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of workspace and community uses, including provision of a primary and secondary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school
 - Reprovision and expansion of existing alternative secondary school
- The site is in multiple ownership, and landowners and developers should work together to develop a comprehensive design-led masterplan for redevelopment of this site, to ensure development is delivered sustainably. Effective engagement between landowners, developers and leaseholders will be needed to facilitate potential land assembly and comprehensive redevelopment.

Form, massing, and heritage

- Height Strategy: Maximum height of 146m at tallest points, which should be at the northern and eastern edges of the site. Other taller buildings of 131m and 117m in the north, and 125m in the east.
- Development should respond positively to the local character of the surrounding built environment and its dockside location, and should step down from Marsh Wall to the smaller-scale residential areas south of Millwall Dock.
- Protect and enhance the setting of the Maritime Greenwich world heritage site and the historic dockside promenade.

Routes and streets

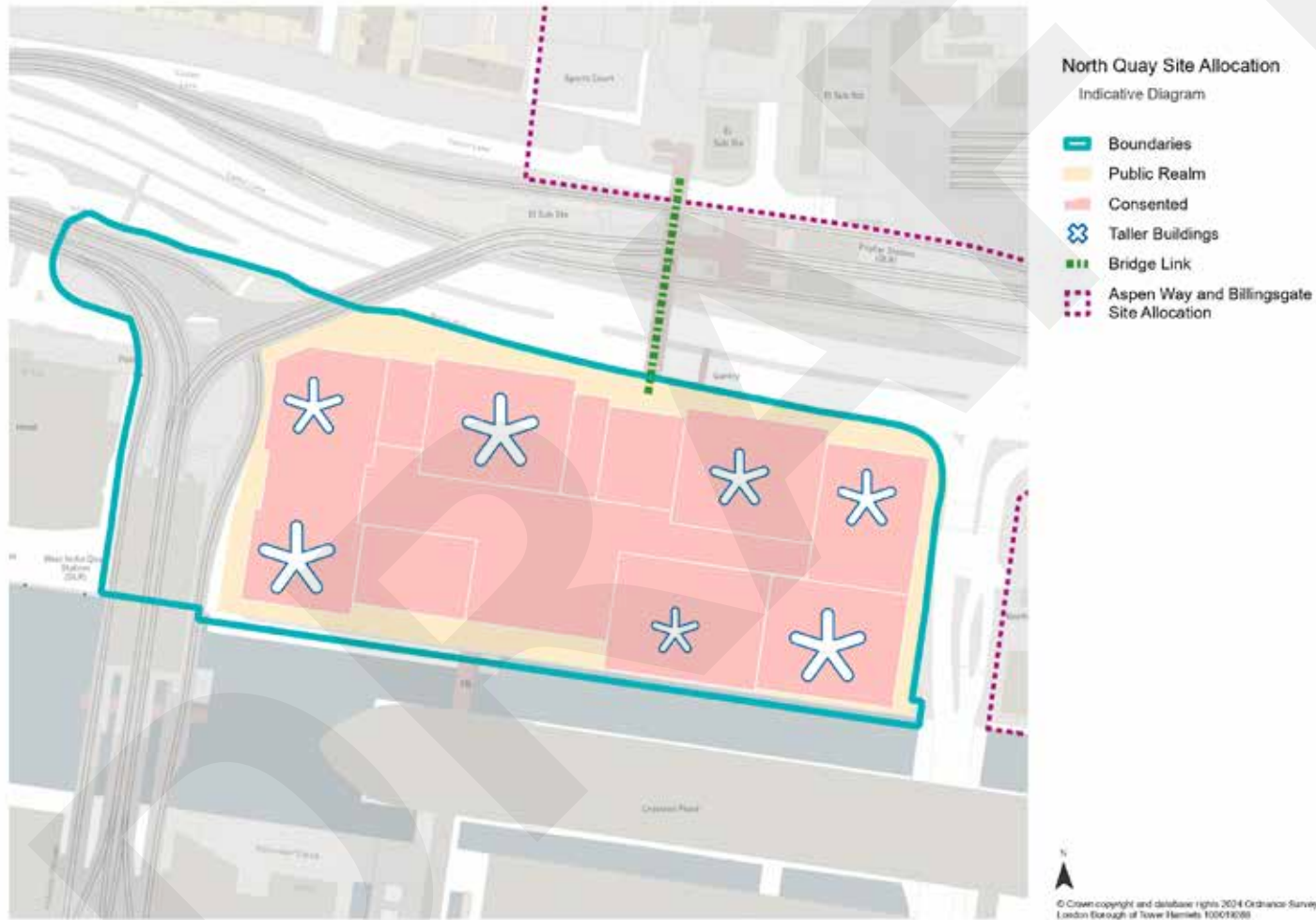
- Create a legible, permeable and well-defined movement network, centred on Millwall Inner Dock, Millharbour and Marsh Wall.
- Improve and enhance walking and cycling connections to, from and within the site, and provide legible and pedestrian friendly connections between Marsh Wall and South Quay Walk, particularly from Mastmaker Road to the South Quay footbridge and from Millharbour through the proposed footbridge to Upper Bank Street. Development must provide public access along the waterfront at Millwall Inner Dock. Improved green grid routes should be delivered along Marsh Wall, Millharbour, and along the waterfront at Millwall Inner Dock, with good quality onward connections to green grid routes through the Marsh Wall West site allocation.

Environment and public realm

- Incorporate active frontages to surrounding streets and spaces (including the waterside) and accessible, high quality public space along the entire dockside.
- Create a positive sense of place with an arrival point in the form of an active square at the corner of South Quay footbridge and Marsh Wall/ Mastmaker Road.
- Prevent excessive overshadowing and enable activation of the dockside by ensuring development is stepped back from the waterside.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use should be investigated.

4.8 North Quay

Figure 50: 4.8 North Quay (indicative)



Site information	Details
Address	Upper Bank Street
Area [ha]	2.87
Ward	Canary Wharf
PTAL [2031]	5-6a
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality ● Skyline of Strategic Importance ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Town Centre (Canary Wharf Metropolitan Centre) ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Statutory listed buildings (Quay Walls, Copings and Buttresses to Import Dock and Export Dock, Grade I)

Site information	Details
Relevant Permissions	PA/20/01421 – Application for outline planning permission (all matters reserved) for the redevelopment of the North Quay site for mixed use comprising: Demolition of existing buildings and structures; Erection of buildings and construction of basements; The following uses: - Business floorspace – Hotel/ Serviced Apartments – Residential – Co-Living.

Site proposal	Details
Indicative capacities	Up to 1,250 homes At least 160,000sqm non-residential uses
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a mixed-use scheme with elements of residential and employment floorspace.
- Acceptable land uses include:
 - Residential (Class C3) – maximum of 75% of floorspace
 - Town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Improved pedestrian crossing over Aspen Way
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.

- Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD. This has been developed between landowners and the council in order to positively address the social, economic and environmental disparities between Poplar and Canary Wharf.

Form, massing, and heritage

- Height strategy: Maximum height of 225m at the tallest point, which should be at the southwest corner of the site. Other taller buildings of a maximum height of 190m in the southeast of the site, 190m in the northeast, and 180m in the northwest.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from north and northwest.

Routes and streets

- Address the barrier of Aspen Way and integrate the site with Poplar High Street to the north, and the Canary Wharf Elizabeth line station and the Canary Wharf estate to the south. These routes should align with the existing urban grain to support permeability and legibility.

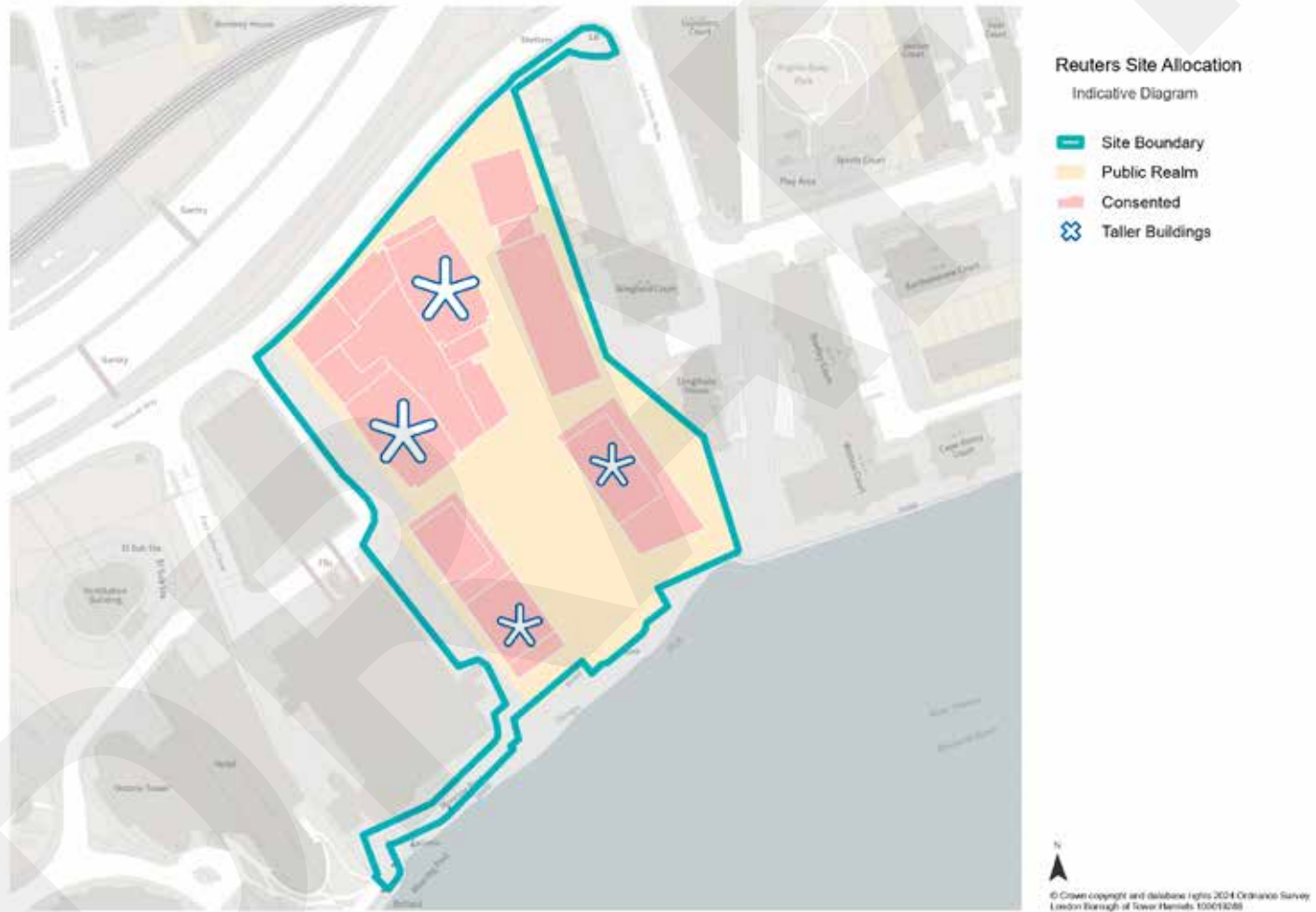
- Improve walking and cycling connections to and from the site, accommodating a new east-to-west pedestrian route through the site which facilitates connections to the wider movement network and the DLR and underground stations adjoining the site. Improve strategic links from Canary Wharf to Poplar High Street through the provision of enhanced north-south links.
- Development must provide public access along the waterfront at North Quay. Improved green grid connections should be delivered through the site and along the waterfront at North Dock, with good quality onward connections to green grid routes at the West India Docks and Hertsmere Road, and connecting to the Aspen Way and Billingsgate Market site allocations.

Environment and public realm

- Create a positive sense of place through the delivery of an active public square connecting the Canary Wharf Elizabeth line station and the dockside promenade to Poplar DLR station and Poplar High Street.
- Across the South Poplar Masterplan area, development should coordinate to manage surface water to enable discharge into the docks to the south.

4.9 Reuters

Figure 51: 4.9 Reuters (indicative)



Site information	Details
Address	Paul Julius Close
Area [ha]	1.72
Ward	Blackwall and Cubitt Town
PTAL [2031]	2-5
Planning designations Page 1068	<ul style="list-style-type: none"> ● Area of substandard air quality ● Thames Policy Area ● Flood risk area ● Site of Importance for Nature Conservation (River Thames and Tidal Tributaries, adjacent to the site) ● Tall Building Zone (Blackwall) ● Archaeological Priority Area (Blackwall, tier 2) ● Statutory listed buildings (Dry Dock at Blackwall Engineering, Grade II)
Relevant Permissions	PA/20/02509 – Phased redevelopment of the site and construction of 5 buildings (with maximum heights of between 9 and 39 storeys) comprising residential dwellings of mixed tenure, primary school & nursery, commercial, business & service floorspace. PA/21/00288 – Full planning permission for a riverboat station, jetty and associated works at Blackwall Yard.

Site proposal	Details
Indicative capacities	900 homes 2,250sqm commercial uses and public house
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a residential-led scheme with provision of a primary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school
- Development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.

Form, massing, and heritage

- Height strategy: Maximum heights of 139m and 117m on the two tallest buildings, which should be located at the northern side of the site. Heights should step down towards the river.
- Buildings should enable visual permeability between Blackwall Way and the River Thames.

- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve movement through the area and repair fragmented urban form by reinforcing the route with active uses from East India DLR station and Blackwall Way towards the Thames Path and the Blackwall Yard Graving Dock.
- Improve walking and cycling connections to, from and within the site, to address the connections to adjacent sites and create a legible, permeable and well-defined movement network. A continuous pedestrian and cycle link along the Thames Path should be provided.
- Development must provide public access along the waterfront at the River Thames. Improved green grid connections should be delivered along Blackwall Way and the River Thames waterfront, with good quality onward connections to adjoining green grid routes, such as the route over Aspen Way towards Naval Row.
- Development on this site will be accompanied by delivery of a new riverbus station, to improve access to the area.

Environment and public realm

- Development should create a positive sense of place with an arrival point in the form of an active public square at the corner of Blackwall Way, through Blackwall Yard to the Thames waterfront.
- Reinforce and complement local distinctiveness with the re-provision of the existing waterspace on site and integrate its function with the open space to maximise amenity provision.
- Respect the waterside setting, ensuring public accessibility to the waterfront by stepping buildings back from the water and ensuring active frontages along the water's edge.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, development on this site should provide an outfall for surface water drainage into the River Thames.

4.10 Riverside South

Figure 52: 4.10 Riverside South (indicative)



Site information	Details
Address	Westferry Circus
Area [ha]	2.17
Ward	Canary Wharf
PTAL [2031]	5-6a
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (part of the site) ● Skyline of Strategic Importance ● Thames Policy Area ● Flood risk area ● Area of deficiency of access to nature ● Town Centre (Canary Wharf Metropolitan Centre) ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Statutory listed buildings (Former West Entrance Lock to South Dock, Grade II)
Relevant Permissions	PA/08/02249 - Erection of office buildings (341,924sqm) comprising two towers (max 241.1m and 191.34m) with a lower central link building (80.05m) together with ancillary parking service and access roads, public open space and riverside walkway, landscaping including public art and other ancillary works. Stalled permission.

Site proposal	Details
Indicative capacities	1,650 homes 56,000sqm commercial floorspace
Phasing	2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use scheme with elements of residential and employment floorspace.
- Acceptable land uses include:
 - Residential (Class C3) – maximum of 75% of floorspace
 - Town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Community centre
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.
- Development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
- Development should not prejudice the potential delivery of a river crossing across the Thames.
- The site has lain dormant for some time, and temporary meanwhile

uses will be encouraged on this site while plans for a more permanent development are prepared. This could include using the site for open space, employment and commercial uses, or temporary residential accommodation.

- Delivery on this site will need to consider the operational requirements of the West India Dock entrance and impounding station, particularly with regards to the delivery of the improved riverside path.

Form, massing, and heritage

- Height strategy: Maximum height of 186m at the tallest point, which should be to the south of the site, adjacent to Westferry Road. Secondary point of significant height opposite this in the north of the site, with a maximum height of 157m, and additional taller buildings of 125m (northern part of site) and 91m (southern part of site). Heights should step down significantly from these tall points.
- The site should be subdivided to create at least three urban blocks with public routes between them, and should deliver variety and distinction in the heights of new buildings across the site to ensure visual permeability between Westferry Road and the River Thames.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from the west.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced,

and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. Development should enhance the listed lock wall and lock entrance that forms the southern boundary of the site. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

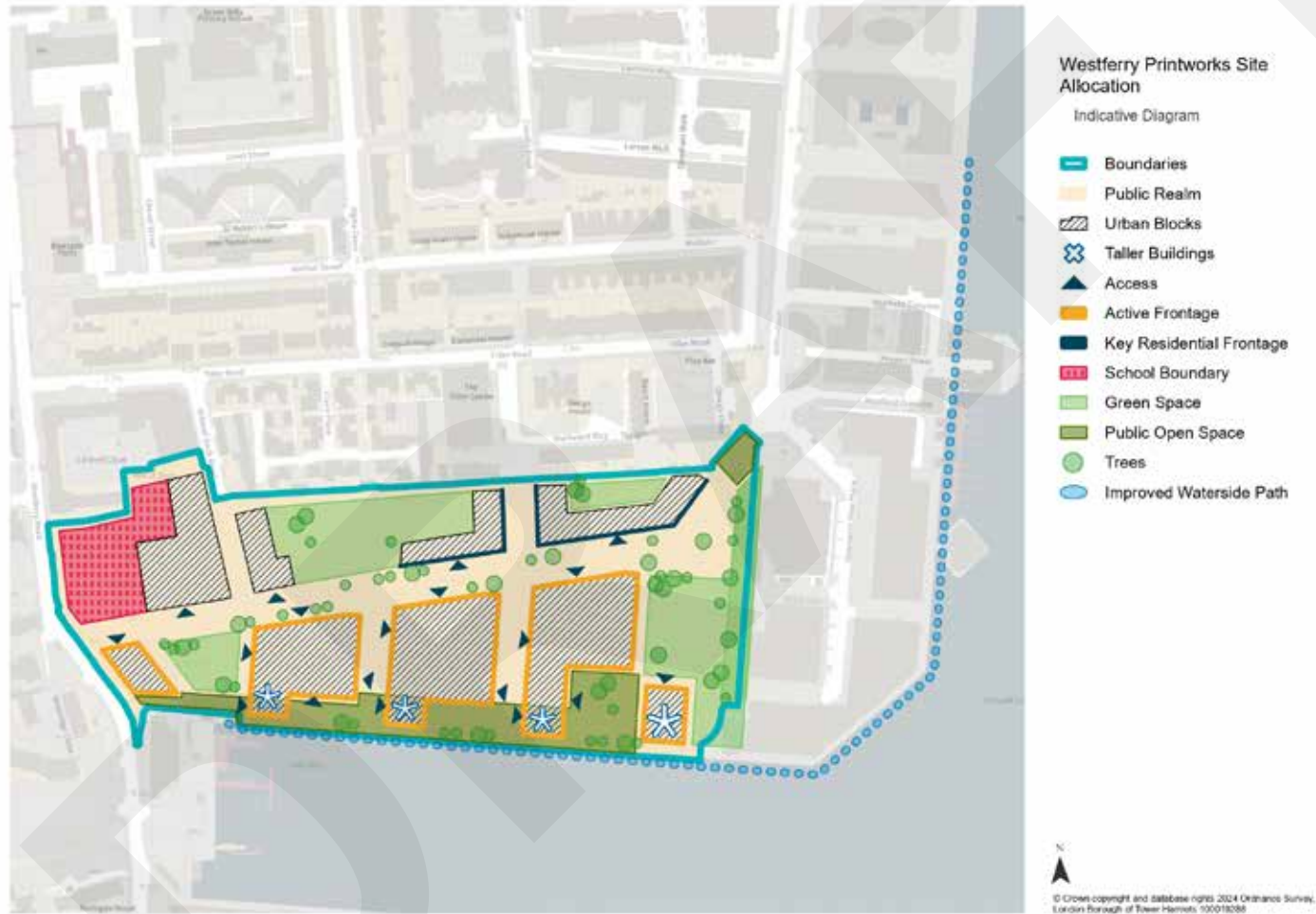
- Improve walking and cycling connections to, from and within the site - particularly to address connections to Westferry Circus, Westferry Road and the River Thames, to create a legible, permeable and well-defined movement network. East-west connections should be created across the site, extending the axis of Bank Street, and providing at least one other east-west route. Reinstate the active street frontage and pedestrian route along Westferry Circus and Westferry Road, with strong visual and activity links to the riverside amenity. Improved green grid routes should be delivered along the River Thames waterfront, with good quality onward connections to the rest of the Thames Path.
- A continuous waterside route for pedestrians and cyclists should be maintained on the western perimeter of the site along the River Thames, ensuring easy public access along the entire waterfront with active retail and commercial uses.
- Development should provide appropriate riparian lifesaving infrastructure along the riverside path.

Environment and public realm

- A major riverside public space should be created at the centre of the site. This space should join all routes and urban blocks together and provide a direct connection to the River Thames. Provide green open space along the River Thames which is activated with commercial uses and expands on the leisure activity hub at Westferry Circus.
- Respect the waterside setting, ensuring public accessibility to the waterfront by stepping buildings back from the water and ensuring active frontages along the water's edge.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, development on this site should provide an outfall for surface water drainage into the River Thames.

4.11 Westferry Printworks

Figure 53: 4.11 Westferry Printworks (indicative)



Site information	Details
Address	Westferry Road
Area [ha]	6.21
Ward	Canary Wharf
PTAL [2031]	1b-2
Planning designations	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Critical Drainage Area (part of the site) ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Neighbourhood Planning Area (Isle of Dogs) ● Tall Building Zone (Millwall Inner Dock) ● Archaeological Priority Area (Isle of Dogs, tier 3)
Relevant Permissions	PA/15/02216 – Comprehensive mixed use redevelopment including buildings ranging from 4- 30 storeys in height (tallest being 110m) comprising: a secondary school, 722 residential units, retail use, flexible restaurant and café and drinking establishment uses, flexible office and financial and professional services uses, Community uses.

Site proposal	Details
Indicative capacities	950 homes 14,500sqm educational floorspace 2,000sqm commercial floorspace 4,000sqm community floorspace 1,500sqm retail floorspace
Phasing	2024-29

Land uses, activities, and delivery

- Development should consist of a residential-led scheme with provision of a secondary school.
- Acceptable land uses include:
 - Residential (Class C3)
 - Small scale retail/town centre uses (Class E)
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Secondary School
 - Community centre
 - Strategic consolidated open space of minimum 1 hectare
- Public open space should be located adjacent to the Millwall Outer Dock and designed to facilitate sport and recreation activities.
- An assessment should be carried out to understand the potential contamination on site prior to any development taking place.

Form, massing, and heritage

- Height strategy: Maximum height of 110m at the tallest point, which should be at the eastern end of the site. Heights should step down towards the existing lower-rise context in the west.
- Development should enable clear lines of sight between Millharbour and Millwall Outer Dock and ensure multiple visual and pedestrian permeability between Tiller Road and Millwall Outer Dock.
- Protect or enhance the setting of the Maritime Greenwich world heritage site.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square,

and particularly its distinctive pyramid, remain visible in views from the south and southeast.

Routes and streets

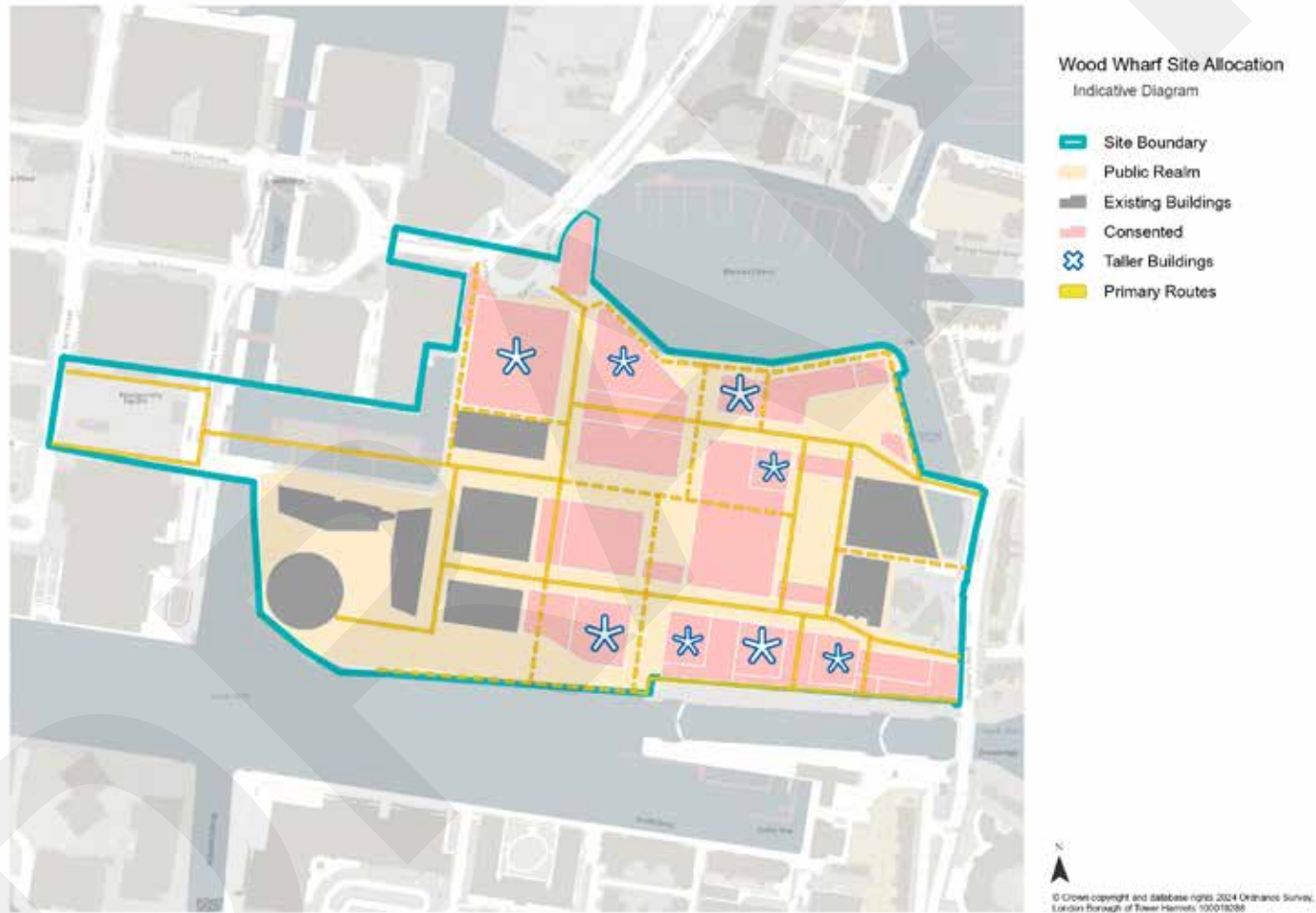
- Improve walking and cycling connections to, from and within the site - particularly to improve connections to Millwall Outer Dock and to Barkantine Estate centre, Westferry Road centre and Crossharbour centre. These routes should align with the existing urban grain to create a legible, permeable and well-defined movement network. Development must provide access along the waterfront at Millwall Outer Dock. Improved green grid routes should be provided along the waterfront at Millwall Outer Dock, with good quality onward connections to green grid routes at Tiller Road and towards the Thames Path.
- New development should be well connected to the existing leisure centre at Tiller Road.

Environment and public realm

- Improve public realm with active site edges, particularly along Westferry Road and Millharbour.
- Respect the waterside setting, ensuring public accessibility to the waterfront by stepping buildings back from the water.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, development on this site should provide an outfall for surface water drainage into the docks.

4.12 Wood Wharf

Figure 54: 4.12 Wood Wharf (indicative)



Site information	Details
Address	Preston's Road
Area [ha]	11.03
Ward	Blackwall and Cubitt Town
PTAL [2031]	3-6a
Planning designations Page 1078	<ul style="list-style-type: none"> ● Area of substandard air quality (small part of the site) ● Skyline of Strategic Importance ● Flood risk area ● Site of Importance for Nature Conservation (Millwall and West India Docks, and Blackwall Basin, both adjacent to the site) ● Town Centre (Canary Wharf Metropolitan Centre) ● Tower Hamlets Activity Area (part of the site) ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Conservation Area (Coldharbour, part of site, most of the Conservation Area is adjacent to the site) ● Statutory listed buildings (Quay Walls, Copings and Buttresses to Import Dock and Export Dock, Grade I; Blackwall Basin, Grade I)

Site information	Details
Relevant Permissions	PA/13/02966 - Outline application (all matters reserved) for mixed-use redevelopment of the site, comprising the erection of buildings, including tall buildings and basements, comprising residential units, hotel, business floorspace, retail, community and leisure, and sui generis uses. The permission also includes a night club/ jazz club in the basement levels of plot C1. As amended.

Site proposal	Details
Indicative capacities	3,600 homes 165-265,000sqm of commercial floorspace
Phasing	2024-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential-led scheme with a mix of retail, workspace, community and cultural uses and the provision of a primary school and health facility and an expansion of the Idea Store.
- Acceptable land uses include:
 - Residential (Class C3) – maximum 75% of floorspace
 - Hotel (Class C1)
 - Town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- Required on-site infrastructure includes:
 - Primary school

- NHS primary health care facility (already delivered and operational)
- Idea Store (or expansion or relocation of existing Canary Wharf Idea Store)
- Strategic consolidated open space of minimum 1 hectare
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.

Form, massing, and heritage

- Height strategy: Maximum height of 211m at the tallest point, which should be in the southwest corner of the site. Other taller buildings of 200m, 157m, 135m, 118m, and 107m on the southern side of the site; and 190m, 167m, and 104m on the northern side of the site. Heights should step down towards the existing residential towards the east of the site.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from the east and southeast.
- The impact of development on nearby heritage assets and conservation areas should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. This includes protecting or enhancing the Blackwall Basin and former West India Dock walls. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

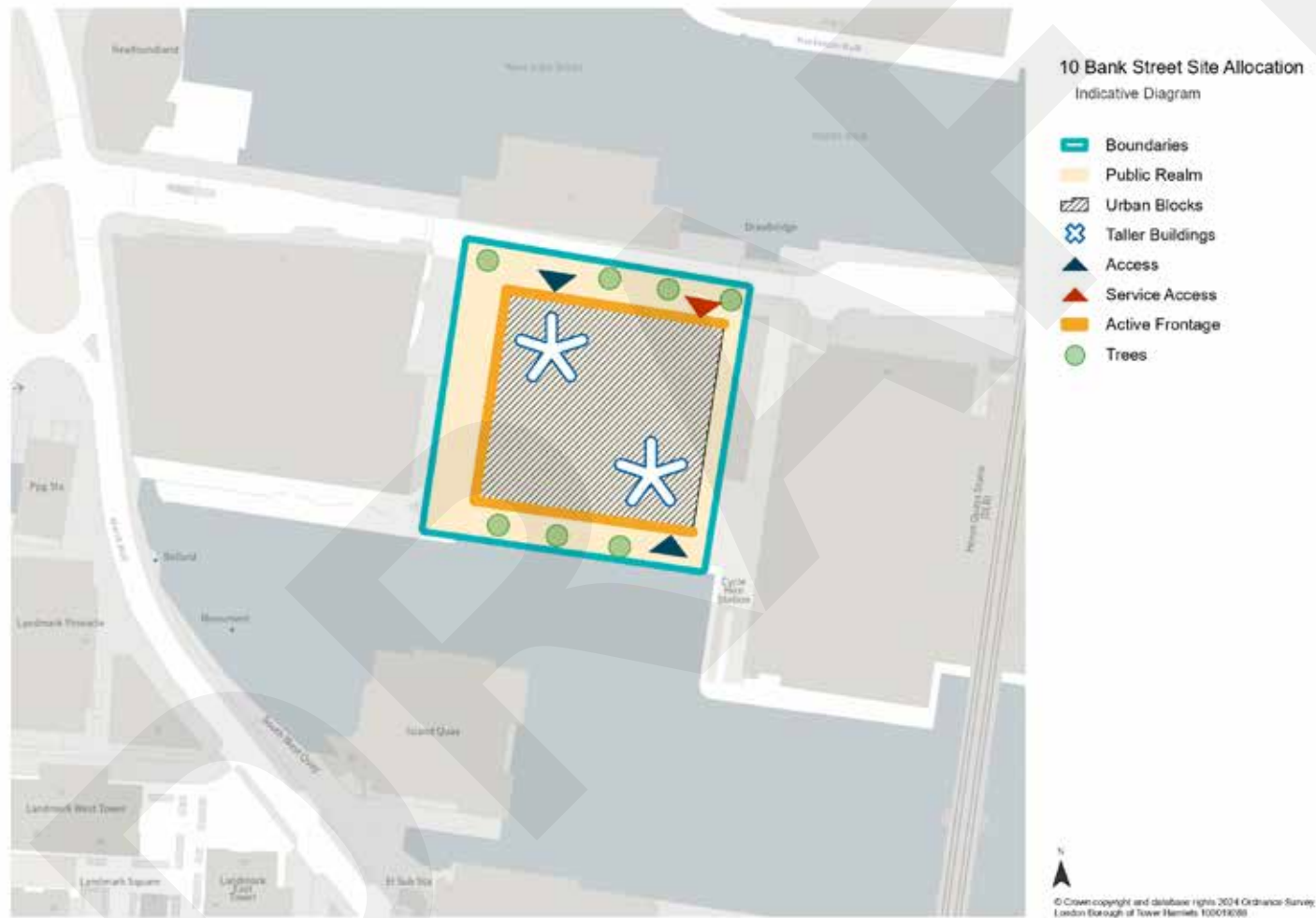
- Create new east-west and north-south walking and cycling routes. These should align with the existing grid geometry of Canary Wharf to create a legible, permeable and well-defined movement network, particularly connecting to Canary Wharf and Marsh Wall East. Development must provide access along the waterfront at Blackwall Basin and South Dock, and provide comfortable access to these spaces. Improved green grid connections should be delivered through the site, with good quality onward connections to green grid routes at Preston's Road and towards Jubilee Park and the Billingsgate Market site allocation.

Environment and public realm

- Prevent excessive overshadowing and enable activation of the riverside by ensuring buildings are stepped back from the water edge.
- Provide a range of new publicly accessible open spaces, including a consolidated open space of at least 1 hectare in size.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater recycling should be investigated.

4.13 10 Bank Street

Figure 55: 4.13 10 Bank Street (indicative)



Site information	Details
Address	Bank Street
Area [ha]	0.66
Ward	Canary Wharf
PTAL [2031]	6a
Planning designations	<ul style="list-style-type: none"> ● Skyline of Strategic Importance ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Town Centre (Canary Wharf Metropolitan Centre) ● Tower Hamlets Activity Area ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3)

Site information	Details
Relevant Permissions	<p>PA/13/01150 - Outline application (all matters reserved) for the demolition of existing buildings and structures and erection of a new building with a maximum height of 191.5m AOD comprising a maximum of 129,857sqm GIA of office floorspace and a maximum of 785 sqm GIA of flexible floorspace (A classes) along with a decked promenade to the South Dock, access and highways works, landscaping and other associated works. (Development not completed)</p> <p>PA/16/02956 - Construction of a building 166m AOD comprising 124,734sqm GIA of office (Use Class B1) and 293sqm GIA of retail (Use Classes A1-A5) along with a decked promenade to the West India Dock South.</p>

Site proposal	Details
Indicative capacities	575 homes 41,000sqm commercial/town centres floorspace
Phasing	2025-29, 2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential- and commercial-led scheme.
- Acceptable land uses include:
 - Residential (Class C3) – maximum 75% of floorspace
 - Commercial and town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.

Form, massing, and heritage

- Height strategy: maximum height of 166m at the tallest point, with massing focused in the southeastern corner of the site. Secondary tall point of maximum height 119m.
- The towers should be carefully designed with respect to overlooking, given the close proximity of this plot to adjacent developments.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from the west and southwest.

Routes and streets

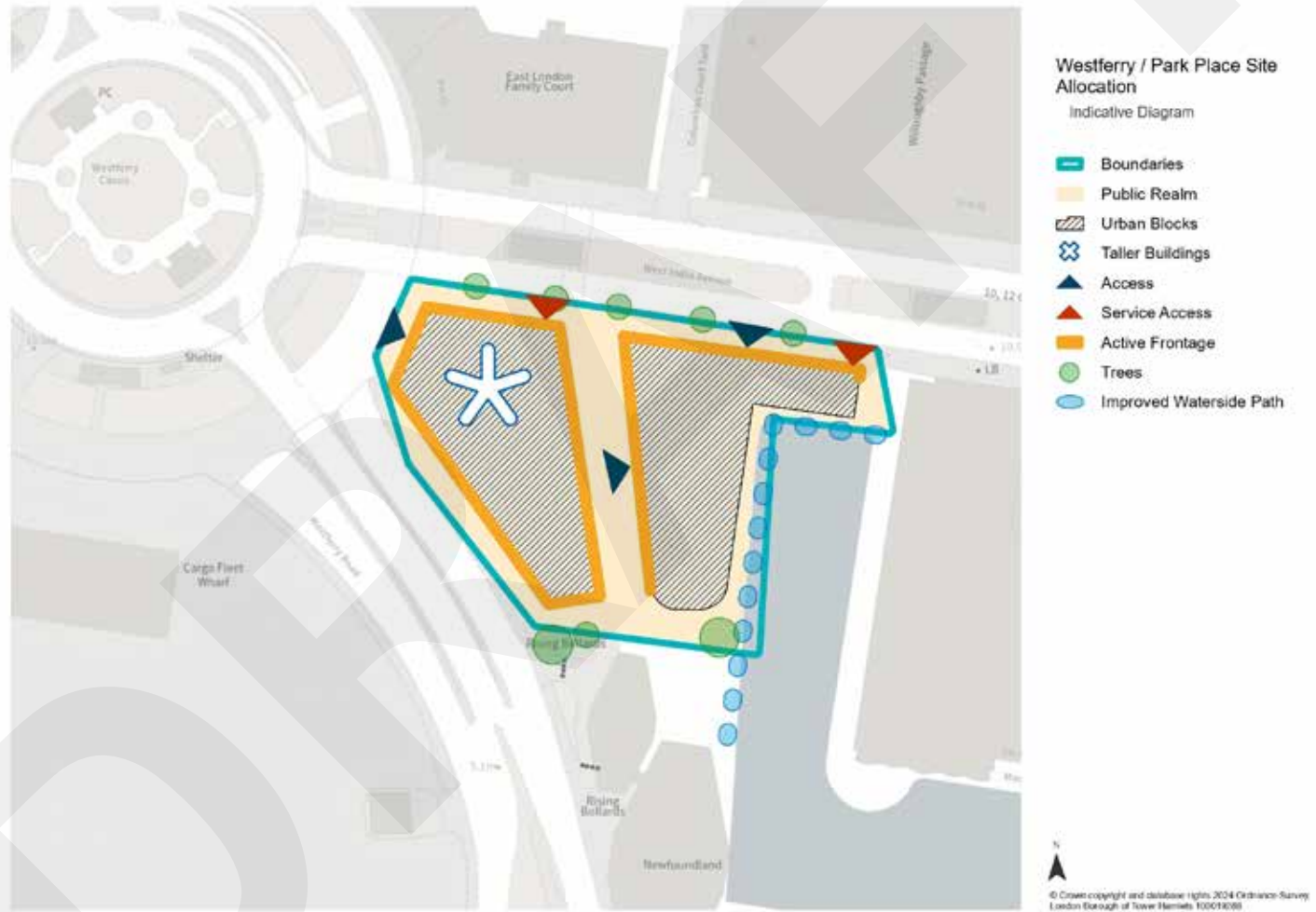
- Improve walking and cycling connections to and from the site, and provide public access to the waterfront at South Dock. Public routes on the east and west sides of the block should also be created, to establish public and accessible routes between Middle and South Docks.

Environment and public realm

- Prevent excessive overshadowing and enable activation of the riverside by ensuring buildings are stepped back from the water edge.
- In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, development on this site should provide an outfall for surface water drainage into the docks.
- Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site should therefore aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm.

4.16 Westferry / Park Place

Figure 56: 4.16 Westferry / Park Place (indicative)



Site information	Details
Address	West Ferry Road/West India Avenue
Area [ha]	0.68
Ward	Canary Wharf
PTAL [2031]	6a
Planning designations Page 1084	<ul style="list-style-type: none"> ● Area of substandard air quality ● Skyline of Strategic Importance ● Flood risk area ● Area of deficiency of access to nature ● Site of Importance for Nature Conservation (Millwall and West India Docks, adjacent to the site) ● Town Centre (Canary Wharf Metropolitan Centre) ● Preferred Office Location (Canary Wharf Fringe) ● Tall Building Zone (Canary Wharf) ● Archaeological Priority Area (Isle of Dogs, tier 3) ● Statutory listed buildings (Quay Walls, Copings and Buttresses to Import Dock and Export Dock, Grade I)

Site information	Details
Relevant Permissions	<p>PA/13/02344: Outline application for the demolition of any existing structures, and construction of a building of up to 102,102sqm GIA comprising office use (use class B1) along with a decked terrace to the Middle Dock.</p> <p>PA/13/02341/A2: Reserved matters application for the erection of an office building (Use Class B1) comprising two basement levels, lower and ground level and 31 upper levels, construction of a new pedestrian link and other works incidental to the development.</p> <p>PA/16/02363/S: Minor-material amendment to outline planning permission PA/13/02344.</p> <p>PA/20/00125/NC: Application for a Certificate of Lawfulness of Existing Use or Development in relation to the implementation of outline planning permission (ref. PA/16/02363/S) and reserved matters application (ref. PA/13/02341/A2).</p>

Site proposal	Details
Indicative capacities	550 homes 19,000sqm commercial/town centre floorspace
Phasing	2030-34

Land uses, activities, and delivery

- Development should consist of a mixed-use, residential- and commercial-led scheme.
- Acceptable land uses include:
 - Residential (Class C3) – maximum 75% of floorspace
 - Commercial and town centre uses (Class E) – at least 25% of floorspace
 - Community uses (Class F1/F2)
- The site is within the Canary Wharf Fringe and is expected to provide at least 25% of the floorspace as commercial uses, with a focus on Central Activities Zone strategic uses as defined in the London Plan.

Form, massing, and heritage

- Height Strategy: Maximum height of 132m at the tallest point, which should be located in the west of the site, fronting Westferry Circus. Heights to step down to the east and south, with secondary high points of 74m and 65m next to the tallest building.
- Heights and layout should ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from the west.
- The impact of development on nearby heritage assets should be considered – heritage assets should be protected or enhanced, and any negative impacts mitigated, because heritage and historic conservation plays a vital role in benefitting place shaping, social cohesion and the economy. For further details, refer to the Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals.

Routes and streets

- Improve walking and cycling connections to and from the site, and provide public access to the waterfront at Middle Dock.

Environment and public realm

- High quality public realm and open spaces should be created between the buildings in the new development, and at the frontage with Middle Dock.
- The street frontage will need to carefully manage level changes on the Westferry Road frontage, where the road passes beneath Westferry Circus and the pedestrian routes rise to meet West India Avenue, and should create an improved pedestrian experience, with wide pavements to create space for pedestrians.
- Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site should therefore aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm.

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Appendices

Appendix 1: Glossary

Term	Abbreviation	Explanation
Active cooling		A heat-reducing mechanism that ensures heat transfer to cool a building. Active cooling is dependent on energy consumption to operate. Examples of active cooling include air conditioning systems.
Active frontages		A building front that promotes activity and natural surveillance, and encourages movement between the building at ground level and the adjacent public realm by the way the building is designed or orientated. A building provides active frontage if the ground floor avoids blank walls or obscured frontages, includes windows and openings, and provides a variety of uses, all of which contribute to natural surveillance and support the visual and physical relationship between the building and ground level.
Affordable housing		Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and our (the council) housing allocation policy. Affordable housing should include provisions to remain at an affordable price for future households or for the subsidy to be recycled for alternative affordable housing provision.
Affordable workspace		Workspace that is provided at rents below the market rate for that space for a specific social, cultural or economic development purpose. The space may be rented directly to the council or to an approved affordable workspace provider.
Agent of Change Principle		The principle places the responsibility of any new development (i.e. the agent of change) to mitigate the impact of nuisances (including noise) from existing nuisance-generating uses. This is to ensure that occupants in the new development are protected from adverse impacts and existing uses are protected from complaints. Similarly, any new nuisance-generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.
Air Quality Assessment	AQA	An assessment of the impact of a development on levels of certain pollutants in the local area

Term	Abbreviation	Explanation
Air Quality Neutral		An Air Quality Neutral development is one that meets, or improves upon, the benchmarks set out in the Air Quality Neutral LPG. These benchmarks set out the maximum allowable emissions of NOx and particulate matter based on the size and use class of the proposed development, and are designed to prevent the degradation of air quality from the combined emissions of individual developments. Air Quality Neutral applies only to the completed development and does not include impacts arising from construction, which should be separately assessed in the Air Quality Assessment.
Air Quality Objectives		Objectives are expressed as pollution concentrations over certain exposure periods, which should be achieved by a specific target date. Some objectives are based on long term exposure (e.g. annual averages), with some based on short term objectives. Objectives only apply where a member of the public may be exposed to pollution over the relevant averaging time.
Air Quality Positive approach		A process of identifying and implementing ways to push a development beyond compliance with both the Air Quality Neutral benchmarks and the minimum requirements of an air quality assessment. To achieve this, an AQP Statement should be submitted that demonstrates how benefits to local air quality have been maximised, and how measures to minimise pollution exposure will be implemented.
Amenity		A quality of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.
Amenity space		An area within the curtilage of a residential development that is used for recreation and provides visual amenity, e.g. gardens or landscaped space. This includes both 'private' and 'communal' amenity space.
Annual monitoring report	AMR	Assesses the effectiveness of our policies and proposals.
Areas of deficiency in access to nature		Areas where people have to walk more than one kilometre to reach a publicly accessible metropolitan or borough Site of Importance for Nature (SINC).
Areas of deficiency in access to public open space		Areas lacking in sufficient publicly accessible open space, as defined by the distances set out in London Plan policy G4 Open space.

Term	Abbreviation	Explanation
Archaeological Priority Area		A defined area where there is significant known archaeological interest which might be affected by development. These areas have been categorised into three tiers according to their relative archaeological significance and potential - Tier 1: Area which is known or strongly suspected to contain a heritage asset of national importance (e.g. scheduled monument). Tier 2: Area where there is known presence or likely presence of heritage assets of archaeological interest. Tier 3: Area with archaeological potential.
Biodiversity Net Gain	BNG	Biodiversity net gain (BNG) is a strategy to develop land in a manner that contributes to the recovery of nature and leaves the natural environment in a measurably better state than it was beforehand. Biodiversity net gain delivers quantifiable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity refers to all living organisms, including animals, insects, plants, bacteria, and fungi. A habitat is the area and resources used by a living organism or assemblage of animals and plants. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures.
Blue Badge parking		Parking available to holders of Blue Badges (permits issued by the local authority entitling holders to park on the public highway in marked bays or on yellow lines.
Business Improvement District	BID	A business-led mechanism for increasing investment within defined areas of a city such as a town centre, based on a supplementary rate levied on businesses within the defined area.
Build to Rent	BTR	Schemes which meet the definition set out in Policy H11 Build to Rent of the London Plan
Building Research Establishment Environmental Assessment Method	BREEAM	A widely used method to assess the sustainability of non-residential developments.
Canary Wharf Fringe		An area of transition between the Canary Wharf Preferred Office Location and the surrounding residential communities. This area has a mix of office uses and residential.

Term	Abbreviation	Explanation
Car-free development		Car-free developments do not provide parking for cars on-site and there is no entitlement to on-street parking permits for residents, with the exception of providing accessible parking spaces for Blue Badge holders.
Central Activities Zone	CAZ	A large area covering Central London and including parts of the boroughs of Camden, Hackney, Islington, Kensington and Chelsea, Lambeth, Southwark, Wandsworth and Westminster, in addition to Tower Hamlets. This area is the traditional commercial and cultural centre of London, with a high concentration of office, shopping, leisure and cultural facilities. Within Tower Hamlets, the CAZ includes the City Fringe and the North Isle of Dogs.
CAZ Centres		Clusters within the Central Activities Zone (CAZ) that are predominantly retail or leisure focused and act as town centres.
Circular economy		An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.
Code of Construction Practice	CoCP	A guidance document setting out relevant legislation, linkages to the Local Plan, key actions to be undertaken by developers (regarding planning submissions and license applications) and encouraging the use of best practice environmental and safety related mitigations while planning and managing demolition and construction works within the borough.
Community facilities		For the purposes of this Local Plan, community facilities can include: public houses, libraries, youth facilities, meeting places, places of worship, public conveniences and other uses in use classes E(d-f), F1, F2(b and d) and Sui Generis that provide a service to the local community.
Community infrastructure levy	CIL	A tariff on development which creates net additional floor space, where the gross internal area of new build exceeds 100 square metres, to help fund new infrastructure required to support the development.

Term	Abbreviation	Explanation
Community-led housing		Schemes that are genuinely community-led all share three common principles: meaningful community engagement and consent occurs throughout the development process (communities do not necessarily have to initiate the conversation, or build homes themselves); there is a presumption that the community group or organisation will take a long-term formal role in the ownership, stewardship or management of the homes; and the benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.
Communal heating systems		A system that supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.
Comparison shopping		Retail goods not bought on a frequent basis, and that may involve comparison shopping or visits to more specialised shopping locations, such as clothes, televisions, fridges and dishwashers etc.
Connectivity		This refers to the number of connections within a street network and their integration, layout and relationship to one another and the impact this has on getting from A to B, by foot, bicycle and vehicle.
Conservation area		An area of special architectural or historical interest, the character and appearance of which the council has a duty to preserve or enhance. The land, buildings and trees in these areas have special protection in the planning system.
Construction, demolition and excavation waste		This is waste arising from the excavation, construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.
Construction logistics and community safety standard	CLOCS	The CLOGS standard is a common standard for use by the construction logistics industry to ensure that construction companies follow effective practice in the management of their operations, vehicles, drivers and construction sites. Each requirement has been developed to reduce the risk of a collision between heavy goods vehicles in the construction sector and vulnerable road users such as cyclists and pedestrians.
Construction management plan	CMP	The CMP provides a site-specific summary of planned management, monitoring and auditing procedures to ensure compliance with the CoCP.
Convenience shopping		The provision of everyday, essential items, such as food, drink and newspapers. In this type of shopping convenience of location usually takes priority.

Term	Abbreviation	Explanation
Creative Enterprise Zone	CEZ	A Mayor of London initiative to establish clusters of creative production, which provide affordable premises and enterprise-related incentives for artists and creative businesses, pro-culture planning and housing policies and offer career pathways and creative jobs for local communities and young people. Tower Hamlets contains one CEZ: The Hackney Wick and Fish Island CEZ in the east of the borough.
Data Centre		A data centre is a physical facility composed of networked computers and storage that businesses and other organisations use to organise, process, store and disseminate large amounts of data.
Design code		A set of simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area.
Development management		Development management is the term used to include the range of activities and interactions that together transform the 'control of development and the use of land' into a more positive and proactive process in keeping with the ethos of spatial planning and supports local authorities in their role as place shapers.
Development management policies		These policies set out detailed criteria to carefully manage and control development through the planning application process.
Development plan		The borough's development plan is comprised of, the London Plan (produced on behalf of the Mayor of London), the Local Plan (this document), and any Neighbourhood Plans which may come forward. The development plan sets out specific policies to guide the use of land and buildings. These policies will be the starting point for assessing planning applications.
District centre		These designations form part of the borough's network of town centres, providing commercial and retail services to predominately serve local communities. They typically have at least one supermarket and a variety of non-retail functions (including community facilities) and are close to the strategic transport network.
District heating network	DHN	A network of pipes carrying hot water or steam, usually underground, that connects heat production equipment with heat customers.
Docklands Light Railway	DLR	An automated, driverless light metro system serving the redeveloped docklands area, including large parts of the borough and adjoining authorities.

Term	Abbreviation	Explanation
Dual aspect		A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. The provision of a bay window does not constitute dual aspect.
Dwelling		A self-contained unit of residential accommodation; also referred to as a 'residential unit'.
Early years		Facilities and services for children of pre-school age (0-4), which include childcare providers, children centres and nurseries.
Easily adaptable		Easily adaptable requires adjustable level kitchen units to be installed to replace the standard units provided; that a level access shower is provided in one bathroom with "wet-room" drainage and that all parts of the dwelling must be suitably sized and that walls are strengthened for the installation of additional mobility aids, as required in the GLA's Housing Supplementary Planning Guidance.
Electric Vehicle Charging Point	EVCP	Also known as a charging station, it is a power supply device that is used to recharge plug-in electric vehicles.
Elizabeth line		A new east-west spinal rail route through central London and beyond
Embodied carbon		In the built environment, 'embodied carbon' emissions refer to the total carbon emissions associated with the construction process, throughout the whole lifecycle of a building. This includes extraction (of raw materials), manufacture, transportation, assembly, replacement, and deconstruction.
Energy Use Intensity	EUI	Energy Use Intensity is a measure of the total energy consumption of a building over a year, per square meter (kWh/m ² /yr). The EUI of a building covers regulated and unregulated energy uses, including space heating, domestic hot water, ventilation, lighting, cooking, and appliances. It does not include charging of electric vehicles.
Employment uses		Offices, industrial and storage and distribution facilities which fall under use classes B2, B8 and E(g), as well as sui generis uses with industrial functions.
Enclosure		Enclosure refers to using 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.

Term	Abbreviation	Explanation
Evening and night-time activities		All uses and activities that take place after 6pm and before 6am. This includes leisure activities such as bars, pubs, restaurants and nightclubs; shops and services that stay open late; and social and physical infrastructure that requires operation and maintenance in the evening and at night, such as hospitals, wholesale markets and public transport.
Family housing		A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms.
Fleet Operator Recognition Scheme Silver accreditation	FORS	The FORS scheme is a voluntary accreditation scheme encompassing all aspects of safety, fuel efficiency, vehicle emissions and improved operations. The FORS silver accreditation is awarded to operators who maintain their bronze accreditation and are able to demonstrate they meet the FORS silver accreditation requirements.
Flood risk zone		Areas within the borough which are at risk from flooding. The flood risk zones consist of zones 1, 2 and 3a and 3b (the higher the number the greater the risk of flooding) and are based on the Environment Agency's flood map for England and Wales.
Gated communities		Walled or fenced housing developments to which public access is restricted, often guarded using CCTV and/or security personnel.
Greater London Authority	GLA	A top-tier administrative body covering the Greater London area. It is comprised of two parts: the London Assembly and the Mayor of London as defined under legislation. The London Assembly scrutinises the activities of the Mayor of London in the public interest.
Green grid		A network of inter-linked high quality and multi-functional open spaces, waterways and other corridors.
Green infrastructure		Green infrastructure is a network of multi-functional green space and other green features. Green infrastructure assets include open spaces such as parks and gardens, allotments, woodlands, fields, hedges, playing fields, footpaths, and cycleways. Assets involving water can also be called 'blue infrastructure', such as rivers, canals, and other water bodies, but these are all included in the overarching term of 'green infrastructure'.

Term	Abbreviation	Explanation
Growth areas		Three different types of character area, as identified in the Characterisation and Growth Study. This defines all areas in the borough as either conserve areas, enhance areas, or transform areas, setting out how new development should respond to the existing character in the area.
Hamlets		This refers to the 24 places (see Figure 5) consisting of historic as well as more recently established places within Tower Hamlets
Habitable room		A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces to be used solely as a kitchen and space such as bath or toilet facilities, corridors, hallways, cellars, utility rooms or similar should not be considered habitable rooms.
Health impact assessment	HIA	Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.
Health facilities		For the purposes of the Local Plan, health facilities can include hospitals, walk-in-centres, doctors surgeries, health and wellbeing centres and community health services.
Healthy Streets		The Healthy Streets Approach is the system of policies and strategies to help Londoners use cars less and walk, cycle and use public transport more. The Healthy Streets Approach uses 10 evidence-based indicators of what makes streets attractive places.
Heritage asset		A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).
Heritage at Risk Register		An annual survey prepared by Historic England which identifies heritage assets that are considered to be at risk as a result of neglect, decay, or inappropriate development, or are vulnerable to becoming so.
High fat, salt, or sugar products	HFSS	A collection of foods and drinks that are considered to be high in fat, salt or sugar content or to be 'less healthy', as defined under The Food (Promotion and Placement) (England) Regulations 2021.

Term	Abbreviation	Explanation
Historic Environment Record		Information services which provide access to details on historic assets and landscapes covering a defined geographic area, held in an on-line database.
Historic parks and gardens		A collection of designated heritage assets celebrated for their designed landscapes.
Human scale		The size and scale of buildings and structures which relate well in size to an individual human being and are arranged in a way which makes people feel comfortable rather than overwhelmed.
Idea stores		These provide traditional library services as well as additional services including IT facilities and places for socialising as well as access to lifelong learning courses.
Infill development		Development that takes place on vacant or undeveloped sites between other developments and/or built form.
Infrastructure Delivery Plan	IDP	An assessment of the existing and future infrastructure needs and requirements to support new development and the borough's growing population.
Infrastructure Impact Assessment		A short document setting out the expected impact of new development on the infrastructure capacity of the borough, and identifying measures for mitigating this impact.
Integrated Impact Assessment	IIA	As part of developing Tower Hamlet's Local Plan all policies have been subject to an IIA. The IIA comprises: Sustainability Appraisal, Health Impact Assessment, Equalities Impact Assessment and Habitat Regulation Assessment.
Intrusive elements		Elements that are harmful for a designated view, for example through obscuring a landmark or protected skyline, or adversely affecting the prominence of a landmark by scale and/or proximity, including through coalescence and visual dominance.
Intermediate housing		Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent.

Term	Abbreviation	Explanation
Landmarks		A built structure, or group of built structures, that is distinctive because of its appearance or location. It stands out from its surroundings, serving as a reference point for orientation and navigation while having historic or cultural significance.
Legibility		The degree to which a place and the movement routes within and around it can be easily understood by those who inhabit the space.
Leisure facilities		For the purposes of the Local Plan, leisure facilities can include leisure centres, indoor and outdoor sports facilities and swimming pools.
Life sciences		The sciences concerned with the study of living organisms, including biology, botany, zoology, microbiology, physiology, biochemistry, and related subjects. Life sciences facilities typically include wet lab and/or dry lab space in addition to supporting offices and other spaces.
Listed building		A building designated for protection due to its heritage value. Listed buildings are categorised into three tiers - Grade I (highest), Grade II*, and Grade II.
Living building' elements		Living building' elements contribute to local biodiversity through providing habitats, and/or features for priority species. They include living roofs, walls, terraces, and other building greening techniques, and swift bricks or nest boxes. 'Living building' elements can also extend to construction materials that are made of organic materials, which often support thermal control, rainwater flow, can in some cases adapt and self-repair, and are typically more sustainable, resilient, and long-lasting than traditional building materials.
Local Development Scheme	LDS	A project plan setting out how the Local Plan and other relevant documents (e.g. supplementary planning documents) will be prepared and when.
Local Mixed-use Employment Location	LMEL	LELs have unique individual characteristics. They are areas of high accessibility that provide or could provide significant capacity for employment accommodation meeting secondary, more local or specialist employment needs, and to support the needs of start-ups, small-and-medium enterprises and creative and digital industries.
Local Industrial Location	LIL	An area or site identified as being important to local employment and required for the reservoir of industrial employment land, to be safeguarded for industrial employment uses.

Term	Abbreviation	Explanation
Local presence facility		An accessible and integrated facility merging services currently provided within one-stop-shops and idea stores providing customers with the ability to access and interact with council services in different ways alongside a range of complementary activities, such as arts, leisure and learning/information services.
Local shop		Shops, typically convenience retailers, located outside of town centres and serving a local residential or working community.
Local views		A local line of sight from a particular point to an important local landmark, view or skyline.
Locally listed buildings		These are buildings of historic or architectural interest at the local level. Although they are not legally protected, close scrutiny will be given to any development affecting them.
London Legacy Development Corporation	LLDC	The LLDC became the planning authority for the Olympic Legacy area following the Olympic Games in 2012. The north-east area of Tower Hamlets (Hackney Wick/Fish Island and Bromley-by-Bow) was transferred to LLDC in terms of planning responsibilities. The planning powers of this area will be handed back to the relevant boroughs, including Tower Hamlets, by December 2024 as agreed by the Mayor of London.
London Plan		The London Plan is the spatial development strategy for all of London. It is prepared by the Greater London Authority. In London, Local Plans must be in general conformity with the London Plan.
London squares		Protected areas that may not be used for any purpose other than as an ornamental garden, pleasure ground, or ground for play, rest or recreation. No building or structure should be created or placed on or over any London square, unless necessary or convenient for the use or maintenance of the square.
London View Management Framework		A document which sets out a number of important views across London that are required to be protected.
Major centre		A major centre has over 50,000 square metres of retail space, serves a borough-wide catchment, has a combined residential and employment density (in its catchment) in excess of other centres in the borough and contains a variety of functions and services, including a growing leisure economy.

Term	Abbreviation	Explanation
Major developments		In the context of the Local Plan, major developments are defined as, 10 to 100 residential units, 1,000 to 10,000 square metres floorspace, and development on a site of more than 0.5 hectare. Please note: any policy requirement referring to major development applies to all development above these thresholds, unless otherwise stated.
Meanwhile sites		Locations that are used for temporary developments or activities while waiting for a more permanent use.
Metropolitan Centre		Metropolitan Centres are designated through the London Plan. Canary Wharf has been designated a Metropolitan Centre because it serves a wide catchment which extends over several boroughs and into parts of the wider south-east region. It contains at least 100,000 square metres of retail, leisure and service floorspace with a significant proportion of higher-order comparison goods relative to convenience goods. Canary Wharf has very good accessibility and significant employment, service and leisure functions.
Metropolitan Open Land		Strategic open land within the urban area that contributes to the structure of London and has the same protection as the Green Belt.
Mixed-use development		Development for a variety of activities on single sites or across wider areas such as town centres.
Movement hierarchy		The hierarchy of roads, streets and other movement routes that shape how people move around.
National Planning Policy Framework	NPPF	The National Planning Policy Framework sets out the government's planning policies for England.
National Planning Practice Guidance	NPPG	An online resource giving up-to-date government planning guidance and requirements.
Natural/Passive surveillance		The discouragement of crime by the presence of passers-by or the ability of people to be seen from surrounding windows.
Neighbourhood Centre		Neighbourhood centres contain a number of shops including a range of essential uses such as a pharmacy, post office or 'corner shop'. They serve a very local catchment (in the region of a ten-minute walking radius) and are located within walking distance to public transport facilities and a strategic road network.

Term	Abbreviation	Explanation
Neighbourhood Parade		Neighbourhood parades are small clusters of shops, other businesses and community facilities. They are smaller than Neighbourhood Centres and typically serve an extremely local catchment (in the region of a five-minute walking radius, or in some cases a single large housing estate).
Neighbourhood Plan		Neighbourhood plans give communities the power to plan for the areas in which they live. These must be in general conformity with the strategic priorities of the development plan, and have regard to national policy and guidance and should not promote less development than set out in the Local Plan. An adopted plan will form a part of the statutory development plan and will be used to inform planning applications within this area.
Neighbourhood planning		Neighbourhood planning gives communities the ability to create planning documents and development orders: Neighbourhood Plans and Neighbourhood Development Orders.
Net zero carbon		A net zero carbon building is where the sum total of all carbon emissions, both operational and embodied, over full lifecycle of the building, are minimised; meeting local carbon and energy targets, with residual 'offsets' equating to no additional carbon emissions being produced.
Open space (consolidated)		A process of combining open space into a single more effective or coherent whole. The way in which these spaces will function will be assessed on a site-by-site basis and agreed through the development management process. At sites with multiple-ownership, this will mean that each site has to deliver their proportion of open space adjoining the open space which the adjoining landowner will deliver, or deliver it in such a way that the open space would still form a coherent whole over the entire site allocation. We strongly encourage landowners to work jointly to develop masterplans covering the entire site allocation to ensure consolidation can be achieved whilst balancing the impact on the landowners. Consolidation should also avoid fragmentation of open space and ensure that it fulfils the qualities and function of open space set out in the Open Space Strategy.
Open space (wider definition of open space)		All land that offers opportunity for play, recreation and sport or is of amenity value, whether in public or private ownership, where public access is unrestricted, partially-restricted or restricted. This includes all open areas consisting of: major parks (e.g. Victoria Park and Mile End Park), local parks, gardens, local parks, squares, playgrounds, ecological spaces, housing amenity land, playing fields (including playing pitches), allotments and burial grounds, whether or not they are accessible to the public. This definition does not include water bodies.

Term	Abbreviation	Explanation
Open space (publicly accessible)		Open space will be considered to be publicly accessible, where access for the public is secured by virtue of legal agreements and formal arrangement; whether it is in public or private ownership. Publicly accessible open space will not include areas of water such as rivers, canals, lakes, docks or incidental spaces.
Operational Carbon		All carbon emissions associated with the energy use of a building during its lifetime.
Opportunity areas		The London Plan identifies a number of opportunity areas; this includes the City Fringe/Tech City, Isle of Dogs and South Poplar and Poplar Riverside in Tower Hamlets. These areas have the ability to accommodate high levels of growth, focusing on housing.
Optimised site-capacity		Responding to the existing qualities of the surrounding context, and balancing the capacity for growth and increased housing supply and affordability alongside an improved quality of life.
Parking stress		The availability of parking spaces in an area.
Permeability		The degree to which an area has a variety of pleasant, convenient and safe routes through it and the capacity to which those routes can enable the movement of pedestrians, cyclists and vehicles.
Permit-free		Permit-free development may contain some parking on-site, in accordance with the parking standards set out in Appendix 3. However, residents are not entitled to on-street parking permits; permit-free developments will need to provide some spaces for disabled residents and for servicing in line with the parking standards.
Place-making		A process which aims to bring all those involved in shaping the quality of a place together in an inclusive and multi-dimensional manner, in order to create sustainable communities and high quality places. Place-making capitalises on a local community's assets, inspiration, and potential, ultimately creating places that people feel proud of and have a stake in.
Planning obligation/S106 agreement		A legal agreement between the developer, local authority and other interested parties primarily intended to make acceptable those developments that would otherwise be unacceptable in planning terms.
Planning Policy for Traveller Sites		This document sets out the government's planning policy for traveller sites.

Term	Abbreviation	Explanation
Policies Map		A part of the Local Plan illustrating the policies and showing the location of proposals on an Ordnance Survey base map.
Polluting development		A part of the Local Plan illustrating the policies and showing the location of proposals on an Ordnance Survey base map.
Preferred Office Location	POL	Area with major office development as the focus, with supporting uses such as gyms, hotels, restaurants and retail uses helping to achieve a sustainable office environment.
Primary and Secondary Frontages		Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.
Private rented sector		All non-owner occupied self-contained dwellings that are being rented out as housing (not including forms of affordable housing).
Public art		Artworks which members of the public are able to access and appreciate. Works may be sited in the public, civic, communal or commercial domain, in semi-public or privately owned public space, or within public, civic or institutional buildings. Artworks can form part of the structure or decoration of buildings, landscapes and streetscapes.
Public sector land		land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed
Public realm		A collective term for all outside elements of the built environment that are accessible to the public, including but not limited to streets, squares, river frontages, and parks. Spaces that are privately owned can still form part of the public realm, if they are accessible to the public.
Public square		A consolidated area of open space primarily used by pedestrians, which should include well-defined edges and active frontages. It should be multifunctional and suitable for gatherings and should be well integrated with the wider movement network. The precise shape/form of the public square will be determined through the development management process.
Public Transport Accessibility Level	PTAL	A measure which rates locations by distance from frequent public transport services (from 0 to 6a, where a score of 0 is very poor and 6a is excellent).

Term	Abbreviation	Explanation
Railway Arches		Spaces underneath railway infrastructure that plays host to a variety of businesses and other uses. Includes both traditional brick arches and the larger spaces underneath the DLR.
Referable development		Planning applications of strategic importance to London are referred to the Mayor of London. In Tower Hamlets, this applies to developments of 150 residential units or more, developments over 30 metres in height, and development on Metropolitan Open Land.
Renewable energy		Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy.
Safeguarded wharves		A network of sites that have been safeguarded for cargo handling uses such as intraport or transhipment movements and freight-related purposes by Safeguarding Directions. A site remains safeguarded unless and until the relevant Safeguarding Direction is formally removed or amended.
Scheduled monument		A collection of heritage assets designated for their historic, architectural, traditional, artistic or archaeological interest.
Secured by Design	SBD	A police security initiative that works to improve the security of buildings and their immediate surroundings through design guidance.
Sensitive development		A development which would allow users of the site to potentially be exposed to pollutants above the objective for the relevant period. For example, the introduction of a new residential development into an area where an air quality objective is already exceeded, would create the potential for the exposure of residents to poor air quality above the objective. This type of development may also generate significant additional traffic flow and also be a polluting development.
Setting (of a heritage asset)		The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral
Short stay accommodation		Short stay accommodation is defined as hotels, apart-hotels, serviced apartments and hostels.

Term	Abbreviation	Explanation
Site allocation		A parcel of land which has been set aside in the plan to accommodate strategic housing developments (i.e. sites that can provide over 500 new net-additional homes) and other uses such as employment and retail space. These sites are also expected to deliver significant infrastructure with capacity to accommodate future growth and development.
Site Environmental Management Plan	SEMP	Submission of an SEMP is required to ensure compliance with the CoCP for strategic and major development proposals. The contents of an SEMP will include a noise and vibration management plan that sets out the location of noise and vibration sensitive receptors and detail how noise and vibration arising from demolition and/or construction will be controlled and limited as far as is reasonably practicable, so that all receptors are protected from excessive noise and vibration levels.
Sites of Importance for Nature Conservation	SINC	Locally defined non-statutory sites of wildlife and geological importance.
Skyline of strategic importance		A significant element of the townscape of Tower Hamlets, formed by the cluster of buildings around Canary Wharf. This cluster is visible across London and has become a globally recognised silhouette.
Social value		Social value refers to a broader concept of value beyond just monetary contribution. It focuses on people and contribution to the community, assessing the positive value created for the local economy, improvements in social wellbeing, and enhancements to protect the local environment.
Space Heating Demand	SHD	The amount of heat energy needed to heat a building over a year, expressed in kWh/m ² /yr, used as an indicator of thermal and energy efficiency.
Spatial Development Strategy	SDS	The London Plan is the statutory spatial development strategy for the Greater London area that is prepared by the Mayor.
Spatial policies		High-level, overarching policies to help guide development and the use of land throughout the borough.
Specialist housing		Specialist housing refers to supported housing such as sheltered housing, residential care homes, nursing homes and dual-registered care homes.

Term	Abbreviation	Explanation
Specialist Centres		Centres within the town centre hierarchy that have a specific economic or cultural function. Includes Columbia Road, Redchurch Street and Hackney Wick.
Statement of Community Involvement	SCI	This sets out how and when we will consult with local and statutory stakeholders in preparing, altering and updating development plan documents and supplementary planning documents.
Strategic development		Proposals involving over 100 homes or 10,000 square metres of floorspace.
Strategic Industrial Location	SIL	Designated by the London Plan. This designation seeks to ensure that there are sufficient sites, in appropriate locations, to meet the needs of the general business, industrial, warehousing, waste management and some utilities and transport sectors.
Strategic Housing Land Availability Assessment	SHLAA	An assessment produced by the Greater London Authority which identifies a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period.
Local Housing Need Assessment	LHNA	This sets out estimates of the borough's current and future housing need.
Strategic Flood Risk Assessment	SFRA	A study which assesses the risk to an area from flooding from all sources, now and in the future, taking into consideration the impacts of climate change, to assess the cumulative impact that land use changes and developments in the area will have on flood risk.
Street furniture		A collective term for objects and pieces of equipment installed along streets and roads for various purposes, including benches, road signs, postboxes, telephone kiosks, and street lighting.
Streetscape		The appearance of the street as a whole incorporating the road, kerb and gutter, verges, fences, trees and building frontages.
Supplementary Planning Document	SPD	A document which helps explain how policies and proposals in the plan will be applied and implemented.

Term	Abbreviation	Explanation
Supplementary Planning Guidance/ London Plan Guidance	SPG/LPG	London Plan Guidance (LPG) provides further information about how the current London Plan should be implemented. Supplementary Planning Guidance (SPG) documents have been prepared to support earlier London Plans.
Sustainability Appraisal	SA	A legal assessment of the social, economic and environmental effects of relevant plans and programmes. This tool is used alongside the Strategic Environmental Assessment, Health Impact Assessment, Habitats Regulations Assessment and Equalities Impact Assessment to appraise impacts on specific groups or characteristics.
Sustainable community		A place or neighbourhood where people have a decent and affordable home to live in and have good access to jobs and services, such as schools, open space and shops, in a safe, inclusive and attractive environment, with opportunities to engage in social and community-based activities, preferably without the need to use a car.
Sustainable Drainage Systems	SuDS	Sequence of water management systems which are designed to manage flood and pollution risks resulting from urban runoff by draining surface water in a sustainable manner. This is achieved by mimicking natural drainage, encouraging infiltration, attenuation, and passive treatment. SuDS can also contribute towards urban greening, biodiversity, and placemaking.
Tall buildings		Within Tower Hamlets, tall buildings are defined as those which are above 30m in height, from ground level to the uppermost element of the building, including any architectural features such as spires, or any other protruding elements such as telecommunications infrastructure or plant.
Tall building cluster		A primarily visual definition based on existing and emerging concentrations of tall buildings, particularly where they form a cohesive group. Tall building clusters generally have a distinctive shape or are visually prominent.
Tall Building Zone	TBZ	A spatial designation that indicates where development proposals for tall buildings may be acceptable within the parameters listed in the policy. These designations are based on the existing distribution of tall buildings, the potential impact of tall buildings on the character of an area, and their capacity for growth and change.

Term	Abbreviation	Explanation
Tenure-blind developments		Schemes that are designed to maximise tenure integration, and affordable housing units designed with the same external appearance as private housing.
Tower Hamlets Activity Areas		Areas of the borough that act as a transition from the predominantly commercial character of the City Fringe and Canary Wharf to the residential character of surrounding communities. These areas tend to have a denser mix of uses than adjacent residential communities and can support the spillover of employment uses from designated employment locations.
Town centre hierarchy		This sets out what role and function different centres in the borough perform in relation to each other and across London. In Tower Hamlets it includes: the Central Activities Zone, Tower Hamlets Activity Areas, Canary Wharf Metropolitan Centre and a series of District Centres, Neighbourhood Centres and Neighbourhood Parades.
Townscape		The term 'townscape' refers very broadly to the overall character and composition of a town (or other aspects of the built environment). It can include the range and quality of buildings in an area, the relationships between those buildings and the different types of space between and around them, and reflects the relationship between people and place.
Transport Assessment		This is prepared and submitted alongside planning applications for developments likely to have significant transport implications. For major proposals, assessments should illustrate the following: accessibility to the site by all modes; the likely modal split of journeys to and from the site; and proposed measures to improve access by public transport, walking and cycling.
Transport interchange		A place where passengers are exchanged between vehicles or different transport modes.
Travel Plan		Travel plans are long term management strategies which should support sustainable and active travel at both new and existing developments.
Urban grain		The complexity and coarseness of an urban area. Fine grained areas have a large number of different buildings and closely spaces streets. Course grained areas have large blocks and building and little architectural variety.

Term	Abbreviation	Explanation
Urban Greening Factor	UGF	Urban greening is a process of introducing vegetation and green spaces into urban areas. It is an initiative to create more sustainable cities with a better quality of life for its residents, by reducing heat, absorbing pollutants from the air, and promoting biodiversity. The Urban Greening Factor (UGF) is a tool that evaluates and quantifies the amount and quality of urban greening that a development scheme provides to inform decisions about appropriate levels of greening in new developments.
Urban Heat Island effect	UHI	An Urban Heat Island (UHI) is an urban area that is significantly warmer than its surrounding rural areas. This happens because the sun's rays are absorbed by hard surfaces rather than by vegetation such as trees, plants, and grass. Radiation from hard surfaces is released into the air as heat. This process exacerbates the city's already hotter and drier summers through urban heat island effect. The UHI reduces the ability for the city to cool and impacts our capacity to regulate temperature.
Waste apportionment		The amount of London's waste that each borough is required to manage to ensure London is self-sufficient in managing its municipal, commercial and industrial waste that it produces. This requires an amount of land to be safeguarded within the borough.
Water neutrality		When total demand for water in a building is the same before and after a development is built. This is achieved by retrofitting older homes and businesses with water efficiency devices, and ensuring that new building and development are highly water efficient.
Water space		An area of water (that exists permanently or intermittently), and includes rivers, canals, docks, basins, ponds, marshland and other water bodies.
Whole Lifecycle Carbon	WLC	The entire amount of carbon resulting from a building or development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/ construction, operation, maintenance and eventual material disposal.
Windfall site		Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available. In Tower Hamlets, we define small sites as sites that contain fewer than 10 housing units.
World Heritage Sites	WHS	A natural or man-made site, area, or structure recognized as being of outstanding international importance and therefore as deserving special protection. Sites are nominated to and designated by the World Heritage Convention (an organization of UNESCO).

Appendix 2: Financial contribution calculation methodologies

Policy DV5 (Developer contributions) of the Local Plan sets out the council's approach to seeking contributions from developers towards funding improvements to infrastructure, the environment and the community. This includes Section 106 planning obligations which may be financial or non-financial.

The following sets out the methodologies to calculate certain financial contributions. Further information is provided in the relevant policies and the Planning Obligations Supplementary Planning Document (SPD) about how and when these financial contributions will be required.

Where appropriate, costings will be adjusted for inflation by index-linking from the date of the Planning Obligations SPD through to payment.

The methodologies included in this appendix are intended to provide detail on how these contributions will typically be calculated in instances when they are required. The methodologies included are not an exhaustive list and the council may wish to negotiate other forms of planning obligations which meet the CIL Regulation 122 tests depending on the individual circumstances of a site and scheme.

Financial Contribution toward development co-ordination and integration (Policy DV4)

Contributions towards development co-ordination and integration projects and interventions by the council will be calculated using the following formula:

£200 x number of residential units

+

£2 x sqm of non-residential floorspace

= financial contribution

Financial Contribution towards affordable housing (Policy HF2, Policy HF6 and Policy HF7)

Major applications

In exceptional circumstances only, the council will accept a payment-in-lieu for affordable housing where the contribution will secure more than 50% affordable housing provision.

Minor applications

Financial contributions for sites delivering 2-9 new residential units will be calculated in accordance with the following formula:

Number of units

X

Small sites contribution

= financial contribution

Financial Contribution towards wheelchair accessible housing (Policy HF9)

In instances where a payment in lieu is accepted, the contribution will be based on the following formula, subject to an updated retrofitting cost:

Number of wheelchair units not to be delivered on-site
X
Installation costs of retrofitting an existing home
= financial contribution

Financial Contributions to help provide off-site Children's Play Space (Policy HF9)

Contributions to help fund the cost of off-site provision of children's play space for developments where this play space is not provided on-site will be calculated according to the following formula:

Number of children (using child yield calculator)
X
10m2 of play space = play space requirement
Average cost per square metre
X
Shortfall in play space requirement provided onsite = play space contribution
Play space contribution + maintenance fee
= financial contribution

Financial Contribution towards energy offsetting (Policy CG3)

In circumstances where energy offsetting is accepted, the contribution will be calculated according to the following formula:

EUI (kWh/m2/yr)
-
Renewable energy generation (kWh/m2/yr)
= Energy gap
Energy Gap (kWh)
X
£1.32/kWh*
= The energy offset contribution

*The offset price will be set on the basis of cost to install PVs elsewhere in the borough. Using a reasonable cost rate for a high output PV system with micro-inverters (i.e. £1,016/kWp) and applying a 10% additional rate for administering and managing the PV funding process, would give an energy offset price of £1.32/kWh/yr. The offset costs may be updated as required.

Financial Contribution towards surface water drainage offset (Policy CG7)

In exceptional circumstances where the required flow and volume restrictions cannot be achieved on site and at the council's discretion, a financial contribution will be calculated in accordance with the following formula:

Exceedance of surface water drainage standard (Proposed water run-off at peak times – Policy CG7 runoff rate)
X
£785 per m ³ (offset unit cost)*
= financial contribution

*the most up to date offset unit cost at the time of approval will be used.

Financial Contribution towards water efficient design offset (Policy CG8)

In exceptional circumstances where the required maximum mains water use cannot be achieved on site and at the council's discretion, a financial contribution will be calculated in accordance with the following formula:

(Proposed mains water use per person per day – maximum mains water use allowance in Policy CG8)
X
£123.90 per litre (offset unit cost)*
= financial contribution

*the most up to date offset unit cost at the time of approval will be used.

Financial Contribution towards air quality offset (Policy CG9)

The method for calculating the air quality offset payment is set out in Section 5 of the Air Quality Neutral London Plan Guidance.

Financial Contribution towards employment, skills, and training (Policy EG1)

The following methodologies will be used to calculate the level of financial contributions towards employment, skills, and training activities:

Construction phase

£4
X
Sqm of the total new development floorspace (GIA)
= financial contribution

End user phase

Employee yield of the development
X
20% (aspirational labour target)
X
Current cost of training and support
= financial contribution

Apprenticeships

A payment in lieu towards apprenticeships where there is shortfall against the target number of apprenticeships:

Number of apprenticeships not provided
X
Cost for providing apprenticeship (calculated as cost of training per person + 35 hours p/w at London Living Wage for 52 weeks)

Financial Contributions towards affordable workspace (Policy EG3)

In instances where a payment in lieu is accepted, it will be calculated in accordance with the formula below. The commuted sum will be used by the council to provide affordable workspace in the Borough. As such, the calculation accounts for the costs the council will incur when delivering these spaces.

Step 1:

15% of GIA (sqm)
X
rental value per sqm (based on projected rental values from subject property or a comparable property)
= rent per annum

Step 2:

Rent per annum
X
$(((1 + i)^n - 1) / (i (1 + i)^n))$
= Contribution

n = discount period

i = All risks yield (calculated as subject property commercial yields / 100)

Monitoring fees (Policy DV5)

All developments requiring a legal agreement will include a monitoring fee to cover the costs of monitoring the agreements for the lifetime of the obligations. Monitoring fees for specific types of obligations may also be sought where on-going monitoring is required, this includes:

- Health Impact Assessment monitoring
- Social Value Strategy monitoring
- Affordable Housing delivery and compliance monitoring
- Low carbon energy and heating
- Water efficient design
- Employment, skills, enterprise monitoring
- Travel Plan monitoring.

Appendix 3: Links to the Tower Hamlets Local Plan 2031 (Managing growth and sharing the benefits)

The table below explains how the policies from the adopted Tower Hamlets Local Plan 2031 (Managing growth and sharing the benefits) have been replaced in this Local Plan.

New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Delivering the Local Plan	Achieving sustainable growth
Policy DV1 Areas of growth and opportunity within Tower Hamlets	Policy S.SG1: Areas of growth and opportunity within Tower Hamlets
Policy DV2 Delivering sustainable growth in Tower Hamlets	Policy S.SG2: Delivering sustainable growth in Tower Hamlets
Policy DV3 Healthy communities	Policy D.SG3: Health impact assessments
Policy DV4 Planning and construction of new development	Policy D.SG4: Planning and construction of new development
Policy DV5 Developer contributions	Policy D.SG5: Developer contributions
Policy DV6 Social value	
Policy DV7 Utilities and digital connectivity	
Policy DV8 Site Allocations	
Homes for the community	Meeting housing needs
Policy HF1 Meeting housing needs	Policy S.H1: Meeting housing needs
Policy HF2 Affordable housing and housing mix	Policy D.H2: Affordable housing and housing mix
Policy HF3 Protection of existing housing	

New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Policy HF4 Supported and specialist housing and housing for older people	Policy D.H4: Specialist housing
Policy HF5 Gypsy and traveller accommodation	Policy D.H5: Gypsies and travellers accommodation
Policy HF6 Purpose-built student accommodation	Policy D.H6: Student housing
Policy HF7 Large-scale purpose-built shared-living	
Policy HF8 Housing with shared facilities (houses in multiple occupation)	Policy D.H7: Housing with shared facilities (houses in multiple occupation)
Policy HF9 Housing Standards and Quality	Policy D.H3: Housing standards and quality
Clean and green future	Protecting and managing our environment
Policy CG1 Mitigating and adapting to a changing climate	Policy S.ES1: Protecting and enhancing our environment
Policy CG2 Low energy buildings	Policy D.ES7: A zero carbon borough
Policy CG3 Low carbon energy and heating	Policy D.ES7: A zero carbon borough
Policy CG4 Embodied carbon, retrofit and the circular economy	Policy D.ES7: A zero carbon borough
Policy CG5 Overheating	Policy D.ES10: Overheating
Policy CG6 Managing flood risk	Policy D.ES4: Flood risk
Policy CG7 Sustainable Drainage	Policy D.ES5: Sustainable drainage
Policy CG8 Water efficient design	Policy D.ES6: Sustainable water and wastewater management
Policy CG9 Air quality	Policy D.ES2: Air quality

New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Policy CG10 Noise and vibration	Policy D.ESg: Noise and vibration
Policy CG11 Contaminated land and storage of hazardous substances	Policy D.ES8: Contaminated land and storage of hazardous substances
People, places and spaces	Creating attractive and distinctive places
Policy PS1 Design- and infrastructure-led approach to development	Policy D.DH7: Density
Policy PS2 Tall buildings Mayor's office to read accompanying note which explains the changes.	Policy D.DH6: Tall buildings
Policy PS3 Securing design quality	Policy S.DH1: Delivering high quality design; and policy D.DH8: Amenity
Policy PS4 Attractive streets, spaces, and public realm	Policy D.DH2: Attractive streets, spaces and public realm
Policy PS5 Creating inclusive spaces	
Policy PS6 Heritage and the historic environment	Policy S.DH3: Heritage and the historic environment
Policy PS7 World heritage sites	Policy S.DH5: World heritage sites
Policy PS8 Shaping and managing views	Policy D.DH4: Shaping and managing views
Policy PS9 Shopfronts	Policy D.DH9: Shopfronts
Policy PS10 Advertisements, hoardings and signage	Policy D.DH10: Advertisements, hoardings and signage
Policy PS11 Siting and design of telecommunications infrastructure	Policy D.DH11: Telecommunications

New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Inclusive economy and good growth	Delivering economic growth
Policy EG1 Creating investment and jobs	Policy S.EMP1: Creating investment and jobs
Policy EG2 New employment space	Policy D.EMP2: New employment space
Policy EG3 Affordable workspace	Policy S.EMP1: Creating investment and jobs
Policy EG4 Loss and Redevelopment of employment space	Policy D.EMP3: Loss of employment space; Policy D.EMP4: Redevelopment within the borough's employment areas
Policy EG5 Railway Arches	
Policy EG6: Data centres	
Town centres	Revitalising our town centres
Policy TC1 Supporting the network and hierarchy of centres	Policy S.TC1: Supporting the network and hierarchy of centres
Policy TC2 Protecting the diversity, vitality and viability of our town centres	Policy D.TC2: Retail in our town centres
Policy TC3 Town centre uses outside our town centres	Policy D.TC3: Retail outside our town centres
Policy TC4 Markets	Policy D.TC7: Markets
Policy TC5 Food and drink	Policy D.TC5: Food, drink, entertainment and the night-time economy
Policy TC6 Entertainment Uses	Policy D.TC5: Food, drink, entertainment and the night-time economy
Policy TC7 Evening and Night-time Economy	Policy D.TC5: Food, drink, entertainment and the night-time economy
Policy TC8 Short-stay accommodation	Policy D.TC6: Short-stay accommodation


New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Community infrastructure	Supporting community facilities
Policy CI1 Supporting community facilities	Policy S.CF1: Supporting community facilities
Policy CI2 Existing community facilities	Policy D.CF2: Existing community facilities
Policy CI3 New and enhanced community facilities	Policy D.CF3: New and enhanced community facilities
Policy CI4 Public houses	Policy D.CF4: Public houses
Policy CI5 Arts and culture facilities	
Biodiversity and open space	Enhancing open spaces and water spaces
Policy BO1 Green and blue infrastructure	Policy S.OWS1: Creating a network of open spaces
Policy BO2 Open spaces and the Green Grid network	Policy D.OWS3: Open space and green grid networks
Policy BO3 Water spaces	Policy D.OWS4: Water spaces
Policy BO4 Biodiversity and access to nature	Policy D.ES3: Urban greening and biodiversity
Policy BO5 Urban greening	Policy D.ES3: Urban greening and biodiversity
Policy BO6 Play and recreation spaces	
Policy BO7 Food growing	
Movement and connectivity	Improving connectivity and travel choice
Policy MC1 Sustainable Travel	Policy S.TR1: Sustainable travel
Policy MC2 Active Travel and healthy streets	



New Local Plan policy reference	Local Plan (2031): Managing growth and sharing the benefits - policy reference
Policy MC3 Impacts on the transport network	Policy D.TR2: Impacts on the transport network
Policy MC4 Parking and permit-free	Policy D.TR3: Parking and permit-free
Policy MC5 Sustainable delivery, servicing, and construction	Policy D.TR4: Sustainable delivery and servicing
Reuse, recycling and waste	Managing our waste
Policy RW1 Managing our waste	Policy S.MW1: Managing our waste
Policy RW2 New and enhanced waste facilities	Policy D.MW2: New and enhanced waste facilities
Policy RW3 Waste collection facilities in new development	Policy D.MW3: Waste collection facilities in new development



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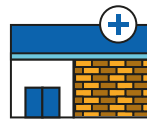
Appendix 4: Key monitoring indicators




The table below sets out the framework for monitoring the performance and effectiveness of the draft new Local Plan for Tower Hamlets and includes targets where these apply. Progress against these indicators will be reported in the borough's future Annual Monitoring Reports (AMR).

Topic area	Policies	Key monitoring indicator
Delivering the local plan  Page 1120	DV1 - Areas of growth and opportunity within Tower Hamlets	Approvals and completions of new homes, employment and retail and leisure floorspaces within the following sub-areas: <ul style="list-style-type: none"> ● City Fringe ● Central ● Isle of Dogs and South Poplar ● Leaside
	DV1 - Areas of growth and opportunity within Tower Hamlets DV8 - Site allocations	Delivery of housing and key infrastructure requirements through site allocations (not including school sites)
	DV3 - Healthy communities	Monitoring the quantity of Rapid and detailed Health Impact Assessments submitted
	DV5 - Developer contributions	Breakdown of community infrastructure levy and S106 monies received and/or negotiated across all topic areas
	DV6 - Social value	Number of additional planning obligations secured within a monitoring year as a result of a social value strategy submission

Topic area	Policies	Key monitoring indicator
Homes for the community 	HF1 - Meeting housing needs	Net additional homes in the monitoring year and previous years by housing type and tenure
	HF2 - Affordable housing and housing mix	Percentage of new homes that are affordable, measured by unit and habitable room
		Percentage of new homes that are affordable, measured by unit and habitable room
	HF5 - Gypsy and Traveller accommodation	Number of Gypsy and Traveller pitches
HF9 - Housing standards and quality	Delivery of wheelchair accessible/ adaptable homes across all housing types	
Clean and green future 	CG2 - Low energy buildings	Number of developments meeting assured performance targets
	CG3 - Low carbon energy and heating	Quantity of PV panels installed
		Number of developments contributing total energy use and renewable energy generation figures
	CG4 - Embodied carbon, retrofit and the circular economy	Developments meeting upfront embodied carbon target
		Number of retrofit plans submitted
	CG5 - Overheating	Number of developments needing to provide detailed overheating assessments
	CG6 - Managing flood risk	Number of developments approved against Environment Agency advice in relation to flood risk and water quality grounds
	CG7 - Sustainable Drainage	Quantity of major developments achieving greenfield run-off
	CG8 - Water efficient design	Water consumption per capita, at a Thames Water regional level
CG9 - Air quality	Concentration of each pollutant at each monitoring station	
	The number of developments that meet or exceed the air quality neutral standards	
	Number of Air Quality Positive Statements submitted.	

Topic area	Policies	Key monitoring indicator
People, places and spaces 	PS1 - Design and infrastructure-led approach to development	Number of applications required to submit infrastructure impact assessment documents
	PS2 - Tall buildings	Number of tall buildings permitted (for the purposes of this indicator, developments referable to the Mayor of London for being over 30m in height will be looked at)
	PS6 - Heritage and the historic environment	Number of designated heritage assets (scheduled ancient monuments, listed buildings, registered parks and gardens, London squares, and conservation areas)
		Removal of heritage assets at risk from the risk register
Inclusive economy and good growth Page 1122 	EG1 - Creating investment and jobs	Net additional employment floorspace delivered by type
		Net additional jobs by type
	EG2 - New employment space	Number of new enterprises created in the borough
	EG3 - Affordable workspace	Net additional affordable workspace
	EG4 - Loss and redevelopment of employment space	Gain/loss of employment floorspace in designated employment locations
		Gain/loss of industrial floorspace in designated industrial locations
	EG5 - Railway arches	Gain/loss of employment floorspace within railway arches
EG6 - Data centres	Net increase in data centre (class B8 or SG) floorspace across the borough and within designated employment locations	

Topic area	Policies	Key monitoring indicator
Town centres 	TC1 - Supporting the network and hierarchy of town centres	Proportion and number of town centre uses (class E) within town centres
	TC2 - Supporting the diversity, vitality and viability of town centres	Town centre vacancy rates
	TC3 - Town centre uses outside centres	Number and floorspace of new town centre uses approved outside of town centres
	TC4 - Markets	Number of pitches and vacancy level in council-operated street markets
	TC5 - Food and drink	Number and proportion of hot food takeaways in town centres; number of new hot food takeaways permitted across the borough; number of new hot food takeaways permitted within 400m of an existing or proposed school or local authority leisure centre
	TC6 - Entertainment uses	Number and proportion of betting shops, casinos and other gambling establishments in town centres; number of new gambling establishments approved within 400m of an existing gambling establishment
	TC7 - Evening and night-time economy	Proportion of businesses in town centres with late opening licenses; proportions of different use classes operating at night
	TC8 - Short-stay accommodation	Approvals and completions of additional short-stay (class C1) accommodation
Community infrastructure 	CI1 - Supporting community facilities	Applications and approvals for new/loss of class E(d-f), F1, F2(b and d) and sui generis uses that provide a service to the local community
	CI2 - Existing community facilities	
	CI4 - Public houses	Loss/gain of public house (class SG) floorspace
	CI5 - Arts and culture	Applications and approvals for new/loss of class F1(b-d) and sui generis uses that provide an arts and culture use

Topic area	Policies	Key monitoring indicator
Biodiversity and open space  Page 1124	BO1 - Green and Blue Infrastructure	0.84ha of publicly accessible open space per 1,000 residents
		Publicly accessible open space losses and gains (approved applications)
		Publicly accessible open space losses and gains (delivered)
	BO4 - Biodiversity and access to nature	Area(s) of open space designated as a Site of Nature Conservation Interest
		Number of developments delivering 30% Biodiversity Net Gain
	BO3 - Water spaces	Improvement of access to water spaces
		Losses and gains of water spaces
Ecological quality of the Lower Lea River		
BO6 - Play and recreation spaces	Number of new high quality play spaces provided by age group	
	Provision of temporary play space and renewed existing play space of a higher quality	
BO7 - Food growing	Number of allotments and community gardens	
Movement and connectivity 	MC1 - Sustainable travel	Transport modal share among residents
	MC4 - Parking and permit free	Number of Transport for London cycle docking stations in the borough
		Number of bike parking spaces approved in applications
		Number of electric vehicle charging points approved in applications
Reuse, recycling and waste 	RW1 - Managing our waste	Safeguarding of waste sites or maintaining waste management capacity for apportionment targets if sites are lost
		Monitoring of operating waste management facilities within the borough
		Recycling rates across the borough

Appendix 5: Noise

Noise thresholds

Noise can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities. Noise can interfere with residential and community amenity and the utility of noise-sensitive land uses.

The significance of noise impact varies dependent on the different noise sources, receptors and times of operation presented for consideration within a planning application. Therefore, thresholds for noise and vibration evaluate noise impact in terms of various 'effect levels' as described in the National Planning Policy Framework.

Aims

Policy CG10 of the Local Plan is seeking to effectively control and manage environmental, neighbour and neighbourhood noise within the context of government policy on sustainable development. It aims to:

1. avoid significant adverse impacts on health and quality of life;
2. mitigate and minimise adverse impacts on health and quality of life; and
3. where possible, contribute to the improvement of health and quality of life.

Approaches to managing noise

1. Good design – Ensuring developments incorporate the concept of "good acoustic design"¹, including through minimising the number of sensitive receptors exposed to noise; ensuring adequate distances between the noise source and sensitive receptors or areas, limiting conflict of use in the development both internally and externally; utilising where possible barriers, natural or otherwise, other buildings, or non-critical rooms in a building.
2. Engineering – reducing noise at source; improving the sound insulation internally and externally of exposed receptors; screening by purpose-built barriers.
3. Administrative – limiting operation time of source, restricting activities allowed on the site, specifying an acceptable noise limit. Several of these measures may be incorporated into the design of a development proposal. Where development is likely to be affected by, or give rise to, high noise levels, applicants are advised to seek the advice of environmental health officers or those with similar expertise.

¹ For more detail see ProPG: Planning and Noise – New Residential Development (Institute of Acoustics and Chartered Institute of Environmental Health and the Association of Noise Consultants, 2017).

General principles

When considering applications for development that will be exposed to an existing noise source, we will take into account the ambient noise level existing at the proposed location at the time of the application and any future likely increase in noise impact that may reasonably be anticipated to occur due to development in the foreseeable future.

Much of the borough is subject to ambient noise levels during the day and at night from transportation, commercial, industrial and leisure sources that are higher than those at which the lowest adverse effects, as defined in policy and guidance, can occur. Development therefore should not make the noise circumstances worse and where possible should improve the situation by lowering noise levels and/or modifying the soundscape in a positive fashion.

In the case of applications involving noise sensitive developments, we will require an applicant to include information about the noise impact of development, or the assessed effect of an existing noise source and transport, industrial or commercial operation upon the development proposed.

A noise impact assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure as set out in Policy CG10. Developers will be required to assess the impact of the proposal as a noise generator or receptor, as appropriate. It will also be required to demonstrate in full how the development will be designed, located, and controlled to mitigate (as appropriate) the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.

We recommend that you seek advice from the council's environmental health department in advance of any noise surveys on the methodology,

duration, and timing etc. of any surveys and advice regarding the nearest noise sensitive receptor.

In all cases, the best practical means of mitigation will be required to mitigate noise impact to an appropriate level, and in liaison with the council's environmental health service.

Where necessary, we will use planning conditions and enter into planning obligations under Section 106 of the Town and Country Planning Act 1990 (as modified by Section 12 of the Planning and Compensation Act 1991) to control noise levels.

Further information and guidance

- Noise Policy Statement for England (Department for Environment, Food and Agriculture, 2010)
- Heating and Ventilation Contractor Association – DW/172 Specification for Kitchen Ventilation Systems (2005)
- British Standard 8233: Guidance on Sound insulation and noise reduction for buildings (2014)
- British Standard 4142: Methods for rating and assessing industrial and commercial sound (2014)
- British Standard 6472: Guide to evaluation of human exposure to vibration in buildings (2008)
- BB93: Acoustic design of schools: performance standards (2015)
- British Standard 5228:2009+A1:2014 Code of practice for noise and vibration on construction and open sites (2014)
- ProPG: Planning and Noise – New Residential Development (Institute of Acoustics and Chartered Institute of Environmental Health and the Association of Noise Consultants, 2017).

Design criteria

The design criteria given below are targets the borough wants to see achieved within the context of government policy on sustainable development. Where a variation from these standards is sought, a detailed submission of the reasons and noise effects must be provided as early as possible, preferably through the pre-application process. Any variation will be considered with respect to the context of the scheme (including its use, design, and location) and any wider benefits, as directed by national policy and guidance. Three basic criteria have been developed to inform the design and layout of proposed developments; these being aimed at guiding applicants as to the degree of detailed consideration needed to be given to noise in any planning application.

The design criteria outlined below are defined in the corresponding noise tables.

- NOEL – No observed effect level
- LOAEL – Lowest observed adverse effect level
- SOAEL – Significant observed adverse effect level.

The values will vary depending on the context, type of noise and sensitivity of the receptor.

- **Green** – where noise is considered to be at an acceptable level. In this category development is likely to be granted.
- **Amber** – where noise is observed to have an adverse effect level, but which may be considered acceptable when assessed in the context of other merits of the development. In this category permission is likely to be refused unless a good acoustic design process is followed.

- **Red** – where noise is observed to have a significant adverse effect. In this category development is likely to be refused. Applicants should seek expert advice on possible noise mitigation measures.

Proposed developments - sensitive to noise

Special consideration will need to be given to noise-sensitive developments that are proposed in areas which are, or expected to become, subject to levels of noise which are likely to have an adverse effect. The threshold of acceptability of the noise will primarily depend on two factors: the intended use of the noise sensitive development and the source of the noise experienced, or likely to be experienced.

Applications for residential development should demonstrate a consideration of 'good acoustic design'².

² For more detail see ProPG: Planning and Noise – New Residential Development (Institute of Acoustics and Chartered Institute of Environmental Health and the Association of Noise Consultants, 2017).

Table 19: Noise levels applicable to noise sensitive residential development proposed in areas of existing noise

Dominant noise source	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Anonymous noise such as general environmental noise, road traffic and rail traffic	Noise at 1 metre from noise sensitive façade (free field)	Day	<50dBLAeq, 16hr*	50dB to 69dBLAeq, 16hr*	>69dBLAeq, 16hr*
		Night	<45dBLAeq,8hr	Between 45dB and 60dB LAeq, 8hr.	>60dB LAeq,8hr
	Inside a bedroom	Day	<40dBLAeq,16hr	40dBLAeq, 16hr	>40dBLAeq,16hr
		Night	<30 dBLAeq,8hr <45dBLAmax,fast	30 to 35dB LAeq,8hr >45 to 60 dBLAmax, fast	>35 dBLAeq, 8hr >60dBLAmax fast
	Outdoor living space (free field)	Day	<50dBLAeq,16hr	50dB to 55dBLAeq,16hr	>55dBLAeq,16hr
	Non-anonymous noise	See guidance note on non-anonymous noise			

*LAeq, T values specified for outside a bedroom window are free field levels

The levels given above are for dwellings; however, levels are use specific and different levels will apply dependent on the noise sensitivity of the use of the premises. We will also take into account the likely times of occupation for types of development and will amend according to the times of operation of the establishment under consideration.

Industrial and commercial noise sources

Relevant standard or guidance document should be referenced when determining values for LOAEL and SOAEL for noise. The standard or guidance should only be used within its intended scope.

Where appropriate, it is expected that the most-up-to-date version of British Standard 4142 'Methods for rating and assessing industrial and commercial sound' will be used. For such cases, a 'rating level' of 10dB below background at 1 metre from the boundary of the nearest noise sensitive receiver should be considered as the design criterion.

Noise insulation

Where the development falls within an area of high noise (amber and red), the most up-to-date version of British Standard 8233 should be met.

Table 20: Noise levels applicable to proposed industrial and commercial developments (including plant and machinery)

Existing noise sensitive receptor	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Dwellings**	Garden used for main amenity (free field)	Day	< 50 dB LAeq, 16 hr	>50<55 dB LAeq,16 hr	>55 dB LAeq,16 hr
Dwellings**	Outside living or dining or bedroom window (façade)	Day	'Rating level' 10dB* below background	'Rating level' between 9dB below and 5dB above background	'Rating level' greater than 5dB above background
Dwellings**	Outside bedroom Window (façade)	Night	'Rating level' 10dB* below background	'Rating level' between 9dB below and 5dB above background	'Rating level' greater than 5dB above background

* Rating level as per BS 4142:2014** Levels given are for dwellings; however, levels are use specific and different levels will apply dependent on the noise sensitivity of the use of the premises.

Entertainment noise

Assessments for noise from proposed entertainment and leisure premises or from proposed sensitive uses in close proximity to existing entertainment and leisure premises must include consideration to amplified and unamplified music, human voices, footfall and vehicle movements and other general activity. Appropriate metrics must be used to measure and assess the noise impact including LAeq, and LAmx, LA10 and NR metrics and as appropriate along with consideration of the source frequency spectrum. The borough will resist development where it is not possible to achieve the levels for noise from proposed entertainment venues within existing noise sensitive receptors, or from existing entertainment venues within proposed noise sensitive receptors, given below.

Table 21: Noise levels applicable to proposed entertainment premises and proposed sensitive uses in close proximity to existing entertainment and leisure premises

Noise sensitive receptor	Assessment location	Design period	LOAEL (Green)	LOAEL to SOAEL (Amber)	SOAEL (Red)
Dwellings	Garden used for amenity (free field)	Day	The lower of 55dB LAeq,5min or 10dB below existing LAeq,5min Without entertainment noise	56dB to 60dB LAeq,5min or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The lower of 61dB LAeq,5min or 2dB below existing LAeq,5min Without entertainment noise
Dwellings	Garden used for amenity (free field)	Evening	The lower of 50dB LAeq,5min or 10dB below existing LAeq,5min Without entertainment noise	51dB to 55dB LAeq,5min Or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The lower of 56dB LAeq,5min Or 2dB below existing LAeq,5min Without entertainment noise
Dwellings	Garden used for amenity (free field)	Night	The lower of 45dB Aeq,5min Or 10dB below existing LAeq,5min Without entertainment noise	46dB to 50dB LAeq,5min Or 9dB to 3dB below existing LAeq,5min Without entertainment noise	The lower of 51dB LAeq,5min Or 2dB below existing LAeq,5min Without entertainment noise

Noise levels applicable to proposed entertainment premises and for proposed residential premises near existing entertainment premises (entertainment noise)

Objectives

For premises where entertainment takes place more than once per week music and associated sources should not be audible inside noise-sensitive property at any time.

For premises where entertainment takes place less frequently than once per week, music and associated sources should not be audible inside noise-sensitive property between 23:00 and 07:00 hours.

For the purposes of this document, airborne noise may be considered not audible when it is at a low enough level such that it is not recognisable as emanating from the source in question and it does not alter the perception of the ambient noise environment that would prevail in the absence of the source in question.

Design criteria

For the airborne transmission of entertainment noise, the following noise rating curves (NR) measured as a 5 minute linear Leq are regarded as meeting the above objectives:

Room	Noise rating curve	Design period
Bedrooms	NR 10 Leq 5 mins	23:00-07:00hrs
All habitable rooms	NR 20 Leq 5 mins	07:00-23:00hrs

The above design criteria apply to the airborne transmission of entertainment noise. The structure borne transmission of noise is regarded as more problematic as the noise tends to take on much more low frequency bias as it propagates through the structure and the noise is often radiated simultaneously from multiple elements of the structure e.g. floors, walls and ceilings, leading to an all-encompassing surrounding sense of perception; in addition structure borne noise can often be perceived as vibration as well as sound, adding to the adverse effect. Consequently, where there is a risk of structure borne transmission of entertainment noise to sensitive premises we may seek more stringent criteria than for airborne entertainment noise. Developers are therefore encouraged to consult with the council's environmental health department at an early stage in the consideration of the scheme to address this issue and to submit proposals to mitigate the risk for review.

Vibration levels from uses such as railways, roads, leisure and entertainment premises and/or plant or machinery at which planning permission will not normally be granted or in line with the most up-to-date version of British Standard 6472

Appendix 6: Air Quality

This appendix provides additional information on air quality matters and aims to ensure the Local Plan is consistent with London Local Air Quality Management (LLAQM) and wider approaches in London. It provides further details and guidance to support the policies contained

in this Local Plan and sets out the basis for which air quality is a material planning consideration in the determination of relevant planning applications. This appendix should be read in conjunction with Policy CG9 – Air quality.

1.1 Air Quality and Planning

All major developments must submit the following documents in preparation of a planning application:

- Air Quality Assessment (AQA)
- Air Quality Neutral Assessment (AQN)
- Air Quality Positive Statement
- Dust Management Plan (DMP)

Depending on the size, minor developments may also require an Air Quality Neutral Assessment.

1.2 Reducing exposure through design

Considerate design can avoid potential impacts on air quality from the earliest stages. The design and layout of buildings influences exposure to poor air quality.

Wider sustainable design principles that reduce energy use and

demand also reduce the potential emissions from buildings, and involve energy efficiency measures, retrofitting where appropriate, pollution control and urban greening. The remaining energy demand is therefore more likely to be met using zero- or low-emission sources.

1.2.1 Form, layout, and orientation

Increased dispersion of pollution can be achieved through suitable form, layout and orientation of buildings and developments. Exposure to poor air quality is minimised through increasing distances between the source (such as roads, railways, and large combustion facilities) and the receptor (i.e. places where human exposure is most likely to occur). This is especially important for sensitive land uses (hospitals, schools, children's playgrounds etc.).

1.2.2 Ventilation

Ventilation systems should account for the impact of ambient air pollution on indoor air quality, such as through the location of air intakes away from sources of poor air quality (such as at roof level and away from exhaust flues). It may be more appropriate to locate less sensitive land uses (such as commercial units) at ground level, where exposure to roadside air pollution is more likely to be transient.

Where filtration systems are incorporated into mechanical ventilation to ensure good air quality, it is important that their efficacy is supported by suitable evidence and that they do not result in significant increased energy demand, in line with Policy CG2 – Low energy buildings.

Sealed windows and façades should only be employed to mitigate poor air quality as a last resort and must ensure compliance with Policy CG5 – Overheating.

1.2.3 Outdoor and recreation space

The location of outside space is an important consideration, due to exposure arising from gardens, balconies, playgrounds, and roof terraces. Exposure in outdoor spaces may be screened through the use of green infrastructure.

Similarly, the location of flues and exhaust vents in relation to recreational areas, such as roof terraces or gardens, is an important consideration.

1.2.4 Public realm

Public realm proposals have the opportunity to reduce exposure to poor air quality and encourage people to spend time away from polluted areas. It is therefore advantageous for development proposals that incorporate public realm improvements to use design, where possible, to improve pedestrian and cyclist connectivity, encourage routes away from busy roads and reduce severance.

Public realm areas for recreation, seating and exercise may be screened from sources of pollution, either by distance or by the appropriate use of green infrastructure. The Mayor of London and Air Quality Expert Group (AQEG) have produced guidance on incorporating green infrastructure to improve air quality.

1.3 Heating and energy supply

The adoption of technologies to generate heat and energy from efficient and/or renewable sources can minimise air pollution emissions. This is due to the technologies either not requiring combustion or, in the case of district heating, being more efficient at heating than individual boilers. Such technologies can include solar water heating, connection to heat

networks, heat pumps (air-source or ground-source) and/or photovoltaic panels. These technologies therefore give rise to lower emissions of local pollutants and hence improve air quality locally.

1.3.1 Generators

Diesel generators produce high emissions of NO_x and particulate matter and can lead to adverse impacts on both long- and short- term concentrations of air pollutants. Generators are often installed for emergency or life safety purposes, but may also be proposed for

business continuity (such as for large offices and data centres) or short-term operating reserve (STOR) power for the National Grid.

Where a secondary electric power supply cannot be assured, alternative technology to diesel generators (such as battery, fuel cell or gas-fired alternatives) are preferable in terms of air quality. Where permanent diesel generators are installed, these will be required to meet relevant emissions standards and are typically only used for emergency and life safety purpose, and associated maintenance and testing.

Where generators are proposed for any other purpose, it would be important to carry out a full assessment of their impact on local air quality, and to determine whether secondary abatement of emissions is required. Diesel generators proposed for any purpose other than

emergency or life safety use will not meet air quality neutral benchmarks due to their emissions of particulate matter. Proposals for generators to provide short-term supply to the National Grid are very location dependent.

It is preferable for construction sites to seek a temporary electricity supply connection to reduce the need for diesel generators. Any on-site diesel plant will need to meet the NRMM Low Emission Zone standards.

1.3.2 Combustion flues

Should combustion plant be installed, consideration of the flue location and discharge velocity is required at the planning stage to ensure appropriate provision has been made.

Flues should be designed to ensure adequate dispersion of pollutants, and where an Air Quality Assessment is undertaken flues should be included. For smaller or simpler developments it may be sufficient

to demonstrate that the flue terminates at least 1m above the tallest building, and is free of surrounding structures, cowls or caps which may reduce dispersion. Consideration must also be given to the neighbouring and proposed buildings, including outdoor amenity space.

Clean Air Act Chimney height approval needs to be sought where a furnace is burning liquid or gaseous matter at a rate of 366.4 kW or greater or burning pulverised fuel or any solid matter at a rate of more than 45.4 kg per hour. Where an Air Quality Assessment is required the chimney height approval should normally be incorporated in the assessment for the development.¹

1.4 Traffic reduction

Emissions from road traffic are the dominant source of elevated pollutant concentrations in London. Infrastructure to make active travel and public transport the most desirable modes is supported by the Mayor's Transport Strategy, the London Plan, Local Implementation Plans and Local Plans.

¹ The Clean Air Act Memorandum on Chimney Heights (1981) and Technical Guidance Note (Dispersion) D1 1993 are applicable primarily to short term impacts and not for considering annual mean nitrogen dioxide concentrations.

Measures to reduce private vehicle use may be implemented at a borough level, and may include the following:

- Car-free developments and maximum parking standards
- Workplace parking policies
- Requirement for parking space leasing
- Secure, covered, accessible cycle parking standards
- Green travel plans
- Provision of car club bays.

1.5 Construction phase

Construction and development can have a negative impact on people and the environment. This impact can be minimised if the development is properly managed.

All construction works should be carried out in line with The Control of Dust and Emissions During Construction and Demolition SPG July 2014 (GLA) and the Tower Hamlets Code of Construction Practice (CoCP) to avoid air pollution and dust nuisance.

The Control of Dust and Emission during Construction and Demolition SPG sets out measures to control emissions associated with construction and demolition, and other up-to-date guidance is produced by relevant bodies such as the IAQM.

All four construction sub-phases (demolition, earthworks, construction, and trackout) of major developments will have to be assessed from a

dust magnitude perspective, by submitting the Dust Risk Assessment of the site. Based on the sub-phase classification, dust monitoring will consist of:

- Visual assessments for a small construction sub-phase category
- The installation of PM10 real time automatic monitors for a medium or large construction sub-phase category. Parameters to be monitored, duration, locations and monitoring techniques must be approved in writing by the London Borough of Tower Hamlets prior to commencement of monitoring.

Furthermore, for medium or large construction sub-phase categories the following details shall be submitted:

- Total number and location of PM10 continuous monitoring stations, model/brand, air quality consultant responsible for downloading the data and preparing the air quality reports.
- PM10 monitoring must be undertaken for three months before construction works shall start. Monitoring shall continue during and after the construction movements.
- The worksite shall have the following Air Quality Trigger levels:
 - a 'red' alert of 190µg/m³ set as a 1-hour mean for concentrations of PM10
- The worksite shall have automatic alerts direct to the site manager so that when dust levels breach the acceptable limits, action can be taken swiftly and effectively. When a trigger alert is received, the project manager or the appropriate person(s) shall review the activities to identify any potential dust or particulate sources. If the cause of the trigger alert relates to site activity, mitigation shall be put in place immediately. When the trigger alert is exceeded, PM10

monitoring units shall send alerts (emails and/or text messages) to the project manager or the appropriate person(s). Tower Hamlets Pollution Team shall also be notified.

- Notification to Tower Hamlets Pollution Team following a trigger alert:
 - The project manager shall, as quickly as practicable, investigate activities on the site to ascertain any visible dust is emanating from the site and identify activities occurring without adequate dust control measures implemented.
 - If it is identified that the cause of the alert relates to the worksite activity, mitigation shall be put in place immediately to reduce impacts.
 - Details of the alert, investigation and actions taken shall be recorded in the site logbook and the Tower Hamlets Pollution Team shall be notified of the event. Within 24 hours of a 190µg/m³ exceedance, an email to Environmental.Protection@towerhamlets.gov.uk shall be sent by completing the appropriate form 'Daily Air Quality Exceedances form – Tower Hamlets Council'. The site logbook shall be available to Tower Hamlets Council too.
 - If no source of the dust event is identified on site, and/or if the cause of the alert is not related to site operations, the outcome of any investigation shall be recorded in the site logbook and reported to Tower Hamlets Pollution Team through the form available on the council website.
 - For the entire construction/demolition works monitoring duration, monthly air quality monitoring report shall be sent to Environmental.Protection@towerhamlets.gov.uk within the first week of the following month. The monthly report shall include Quality Assurance (QA) and Quality Control (QC) information regarding the monitoring units.

2 Air Quality Assessments

An air quality assessment (AQA) is designed to ensure that development proposals do not result in unacceptable impacts on local air quality or introduce new exposure into areas of poor air quality. They will also outline how development proposals accord with relevant planning policy and any mitigation measures required to make the proposed development acceptable in planning terms.

2.1 Scoping the need for an assessment

An AQA is required to accompany any major planning application, to show how a development meets the requirements of London Plan Policy SI 1 and Local Plan Policy CG9. An air quality assessment is also required for minor developments if future residents, users, or occupants may be exposed to poor air quality.

AQAs consider all stages of the development process, including impacts during the demolition and construction phases. Guidance for the assessment of construction and demolition impacts is set out in the Mayor of London's Control of Dust and Emissions during Construction and Demolition SPG.

The Institute of Air Quality Management (IAQM) has produced several guidance documents on carrying out air quality assessments, including for more specific air quality considerations, which should also be referred to when carrying out air quality assessments:

- Land-Use Planning & Development Control: Planning for Air Quality
- Impacts on designated nature conservation sites
- Assessing odour for planning
- Assessing mineral dust impact for planning

2.2 Contents of an air quality assessment

The scope of an air quality assessment usually includes:

- An assessment of the existing baseline air quality in the vicinity of the proposed development.
- Identification of the opportunities and constraints on the site, and what measures can be taken at the design stage to avoid the need for mitigation later.
- Predictions of the future impact of the development, comparing the future scenario with and without the proposed development, but including all cumulative (consented) development.

An AQA should include the following:

- Site location and brief description of the proposed development, and how it relates to existing air quality.
- Outline of the relevant planning and air quality policy (including odour and dust when appropriate).
- Description of the assessment methodology with appropriate data presented, to allow decision makers to assess the technical quality of the work and the assumptions underlying any model adjustments or verification factors.
- Location and description of all receptors used in the assessment, including any particularly sensitive receptors (residential properties, schools, hospitals etc.) and may include ecological receptors.
- Assessment of the baseline air quality/dust conditions in the vicinity of the proposed development, and a description of all nearby sources of pollution likely to impact on the development, including emissions from nearby energy plant (boilers/CHP) and industrial installations where necessary.

- Prediction of the impact of the proposed development on local air quality, including
 - description of the impacts at individual receptors;
 - description of likely changes in air quality conditions as a result of the development, including any exceedances of the air quality objectives/air quality assessment levels which are created or sustained by the development;
 - consideration of emissions from all sources, including combined impacts road traffic and energy plant.
- Prediction of the exposure of future residents, occupants, or users of the proposed development, including contour maps of pollutant concentrations where appropriate.
- Description and quantification of further mitigation measures required to make the development acceptable in air quality terms.
- An assessment of the significance of the impacts after mitigation.
- An assessment of the cumulative impacts with other development during construction and operation.
- A statement as to whether the development is or is not consistent with relevant policy,.
- Conclusion of the assessment

Section 6 and 7 of the EPUK/IAQM 'Planning for air quality' guidance gives more in-depth information on how to address the requirements listed above.

Air quality assessments carried out using realistic worst-case assumptions to minimise the uncertainty in the outcomes are considered most robust. If certain parameters are unknown or uncertain, this ensures that the results of the assessment are conservative in nature.

Air quality assessments should also take into account the cumulative air quality impacts of other development, including developments that are under construction or have been granted planning permission in the vicinity of the proposed development, where practicable.

Early consultation with the air quality officer is recommended to ensure that the methodology of the air quality assessment is agreed, and that all relevant local considerations and cumulative development are accounted for.

2.3 Construction phase assessments

Information on the assessment and mitigation of air quality and dust impacts during the construction phase is provided in the Mayor of London's Control of Dust and Emissions during Construction and Demolition SPG.

2.3.1 Construction Dust Risk Assessment

A construction dust risk assessment is an assessment of the risk of dust and PM10 impacts from a construction site. It considers the risk of impacts from demolition, earthworks, and construction, as well as from dirt and dust tracked out onto the highway from construction vehicles (track out). The construction dust risk assessment will inform the level of mitigation to be implemented over the duration of the construction works.

A construction dust risk assessment should be carried out in accordance with Chapter 3 and Chapter 4 of the Control of Dust and Emission during Construction and Demolition SPG.

2.3.2 Air Quality and Dust Management Plan (AQDMP)

The AQDMP outlines the measures and protocols which will be

implemented to reduce the impacts of dust and PM10 during the construction works and will reflect the outcomes of the construction dust risk assessment. It may also outline the dust and particulate matter monitoring protocols to be implemented on-site.

The AQDMP should be prepared in accordance with the requirements in Chapter 5 of the Mayor of London's SPG.

2.3.3 Non-Road Mobile Machinery (NRMM)

NRMM includes mobile machines and transportable industrial equipment or vehicles which are fitted with an internal combustion engine and not intended for transporting goods or passengers on roads. NRMM, particularly from the construction sector, can be a significant contributor to London's air pollution.

All NRMM on construction sites, with a power rating between 37 kW and 560 kW, will be required to meet the emissions standards of the NRMM Low Emission Zone by planning condition. These emissions standards are based on those defined for both variable and constant speed engines in EU Directive 97/68/EC and its subsequent amendments, for both NOx and PM.

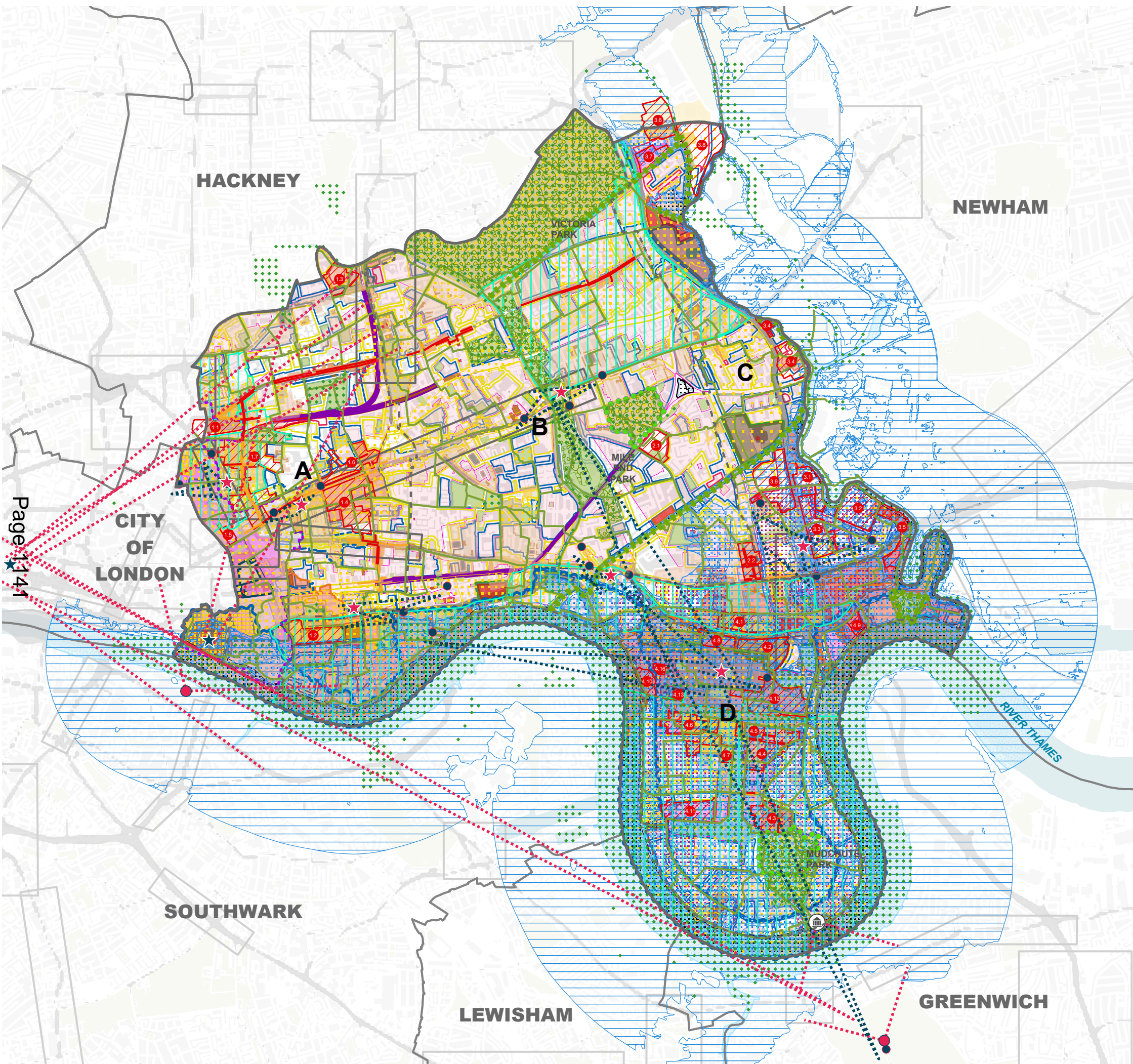
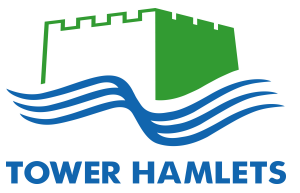
The current standards are Stage IV for construction machinery operating in the Central Activities Zone and Opportunity Areas (including Canary Wharf) and Stage IIIB in the rest of London. Stage IV standards will apply throughout London from 1st January 2025, and Stage V from 2030.

Prior to commencement of works, all NRMM must be registered on the NRMM register, which can be accessed at www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/nrmm. A number of exemptions also apply to individual pieces of equipment.

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New Local Plan Policies Map – July 2024

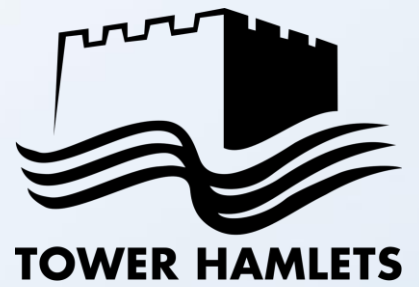


- London Borough of Tower Hamlets Boundary
- Local Plan Sub-Areas**
 - A - City Fringe
 - B - Central Area
 - C - Lower Lea Valley
 - D - Isle of Gogs and South Poplar
- Neighbourhood Planning Areas
- Safeguarded Wharves
- Site Allocations
- Safeguarded Sites for Gypsy and Traveller Accomodation
- Area of Flood Risk
- Flood Zone 2
- Flood Zone 3A
- Flood Zone 3B
- Water Space
- Critical Drainage Areas
- Air Quality Focus Areas
 - Area of Over 25 µg/m³ Particulate Matter 2.5µm Concentrations (Annual Mean)
 - Area of Over 40 µg/m³ Nitrogen Dioxide Concentrations (Annual Mean)
- Tall Building Zones A-E
- Tall Building Zone F
- Skyline of Strategic Importance
- World Heritage Site View
- Strategically Important Landmarks
- London View Management Framework & Other Key Views (World Heritage Site Views)
- Borough Designated Landmarks
- Borough Designated Views
- World Heritage Sites and Greenwich Buffer Area
- Tier 1 Archaeological Priority Area
- Tier 2 Archaeological Priority Area
- Tier 3 Archaeological Priority Area
- London Squares
- Conservation Areas
- Statutory Listed Buildings
- Scheduled Ancient Monuments
- Registered Parks and Gardens
- Local Mixed Use Employment Location
- Local Industrial Location
- Canary Wharf Primary Office Location
- Canary Wharf Fringe
- Central Activities Zone (tertiary area)
- Secondary Preferred Office Location
- Strategic Industrial Location
- Central Activities Zone
- Railway Arch Zone
- Primary Shopping Frontage
- Secondary Shopping Frontage
- Tower Hamlets Activity Areas
- Neighbourhood Parade
- Primary Shopping Areas
- Metropolitan Town Centre
- District Town Centre
- Neighbourhood Town Centre
- CAZ Frontage
- Publicly Accessible Open Space
- Metropolitan Open Land
- Lee Valley Regional Park
- Site of Importance for Nature Conservation
- Local Nature Reserves
- Green Grid
- Area Of Open Space Deficiency
- South East Inshore Area
- Thames Policy Area
- LBTH Safeguarded Waste Site
- LBTH Hazardous Waste Site
- LBTH Area of Search Suitable For Waste Site
- LBTH Waste Transfer Station
- LLDC Existing Waste Site
- LLDC Area Of Search Suitable For Waste Site
- Growth Strategy Conserve
- Growth Strategy Enhance
- Growth Strategy Transform

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Tower Hamlets Borough Council

New Local Plan

Interim Integrated Impact Assessment Report
Non-Technical Summary



Tower Hamlets Borough Council

New Local Plan

Interim Integrated Impact Assessment Report Non-Technical Summary

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1 Introduction

1.1 Overview

- 1.1.1 The London Borough of Tower Hamlets (here in referred to as LBTH) is in the process of preparing a new Local Plan for the borough. The new Local Plan will set out how development will be planned and managed across the borough through to 2038.
- 1.1.2 It will set out how the borough can sustainably develop, identifying the number of new homes, jobs and facilities needed to support the growing and changing population, as well as protecting all the features that the borough's communities cherish, such as town centres, parks and open spaces, waterways, cultural and historic buildings.

1.2 The New Local Plan

- 1.2.1 The new Local Plan will set out the vision for the future of the borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of the environment, green spaces and cultural and historic assets.
- 1.2.2 Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the borough will develop through to 2040.
- 1.2.3 The Local Plan seeks to build upon feedback from public consultations and respond to the many ideas and key issues identified by local communities, and stakeholders that have contributed to the plan-making process so far. It sets out a shared vision for the future of the borough and includes the proposed strategy and planning policies that will help guide and manage development in the area over the new Local Plan period (2025 to 2040).
- 1.2.4 The new Local Plan includes 72 policies and 24 site allocations, with an additional 16 alternative sites.
- 1.2.5 Further details on the vision, objectives and policies can be found in **Section 2** of the main **IIA Report**.

2 Methodology

2.1 What is IIA?

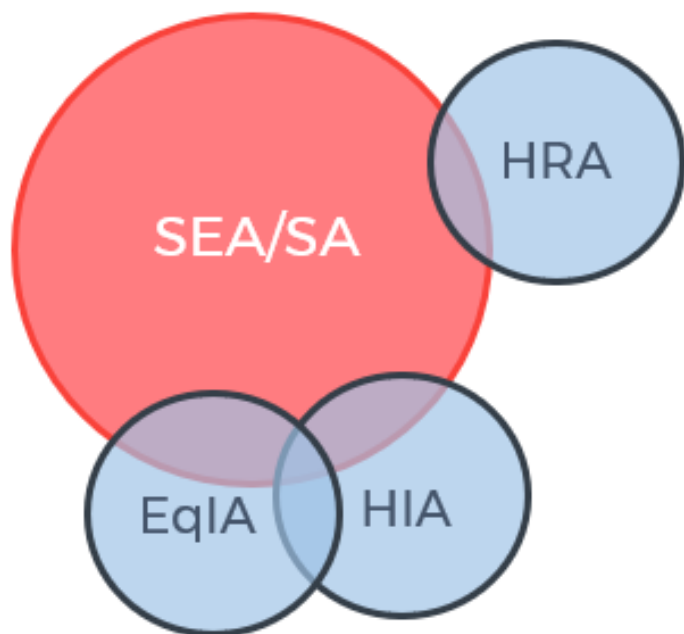
2.1.1 Sustainability Appraisal is a systematic process that is undertaken during the preparation of a plan. Its role is to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.

2.1.2 The IIA combines the following assessment processes:

- Strategic Environmental Assessment (SEA);
- Sustainability Appraisal (SA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA).

2.1.3 **Figure 2-1** below shows the relationship of each of these IIA elements.

Figure 2-1 - Relationship of IIA Elements



2.1.4 An integrated assessment approach enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. A single process can improve efficiencies in

the assessment itself, as many of the issues covered in the different forms of assessment overlap. This process also helps to simplify outcomes and recommendations for policymakers.

2.1.5 Each component of the assessment has been described below:

- **SA:** The SA process is carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which emerging plans will help to achieve relevant environmental, economic and social objectives.
- **EqIA:** The EqIA process focuses on assessing and recording the likely equalities effects as a result of a policy, project or plan. It seeks to ensure that the policy, project or plan does not discriminate or disadvantage people and enables consideration of how equality can be improved or promoted. It covers the following nine Personal Protected Characteristics:
 - Age;
 - Disability;
 - Gender;
 - Gender reassignment;
 - Marriage and civil partnership;
 - Pregnancy and maternity;
 - Race;
 - Religion or belief; and
 - Sexual orientation.
- **HIA:** The HIA process is used to identify the likely health effects of plans, policies or developments and to implement measures to avoid negative impacts and promote opportunities to maximise the benefits. There is no formally adopted methodology for HIA although there is a body of practice and guidance at a policy level.
- **HRA:** The HRA assessment is undertaken to identify whether plans or projects will be likely to have a significant effect on a designated site. The stages of HRA assessment are as follows:
 - Stage 1: Screening: initially identifies the likely impacts upon a Natura 2000 site (sites designated as Special Areas of Conservation (SACs) and Special

Protection Areas (SPAs) in the UK) of a plan or project, either alone or in combination with other plans or projects, and considers whether these impacts are likely to be significant;

- Stage 2: Appropriate Assessment: the detailed consideration of the impact on the integrity of the Natura 2000 sites of the plan or project, either alone or in combination with other plans or projects. This is to determine whether there will be adverse effects on the integrity of the site;
- Stage 3: Assessment of alternative solutions: the process which examines alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the Natura 2000 site; and
- Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain: an assessment of whether the development is necessary for imperative reasons of overriding public interest (IROPI).

2.2 IIA Methodology

2.2.1 IIA is a continual process of gathering data and evidence, assessment of environmental effects, developing mitigation measures and making recommendations to refine plans or programmes in view of the predicted environmental effects.

2.2.2 The key stages of the IIA process are the following:

- **Stage A:** Production of a scoping report which sets the context of the local plan, identified other relevant policies, plans and programmes, baseline information and sustainability objectives. This was undertaken in August 2023.
- **Stage B:** Assessment of draft policies and alternative policies and strategic and alternative sites and the preparation of the IIA Report. HIA and EqlA assessments are undertaken at the same time and the findings incorporated into the IIA Report. The report is then consulted on alongside the draft Local Plan (also referred to as Regulation 18 consultation);
- **Stage C (this stage):** Assessment of preferred policies and sites and the preparation of the IIA Report. HIA and EqlA assessments are undertaken at the same time and the findings incorporated into the IIA Report;

- **Stage D:** Consultation on the preferred Local Plan and the IIA Report (also referred to as Regulation 19 consultation). The Local Plan and IIA then undergo independent examination; and
- **Stage E:** Monitoring the significant effects of implementing the Local Plan.

Full details on the methodology can be found in **Section 3** of the IIA Report.

Identification of Sustainability Issues and Opportunities

- 2.2.3 The IIA Scoping Report, outlined key baseline information, identified key sustainability issues in the borough and identified future trends which could occur without implementation of the Local Plan.
- 2.2.4 Following the findings identified at scoping, and updates based on changes in legislation and best practice guidance, an IIA Appraisal Framework has been produced, which was used to guide the assessment process of the plans and strategies.
- 2.2.5 This Appraisal Framework has guided the IIA assessment of the Local Plan and is shown below.
- **IIA1:** To build inclusive communities by reducing social exclusion, promoting equity and equality and respecting diversity.
 - **IIA2:** To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH's residents.
 - **IIA3:** To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets' town centre and other district and local centres.
 - **IIA4:** To ensure that residents have employment opportunities and access to training.
 - **IIA5:** To meet the housing needs of all of the borough's residents inclusively.
 - **IIA6:** To reduce crime and the fear of crime for all residents inclusively.
 - **IIA7:** To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally.
 - **IIA8:** To protect and enhance access to essential services and facilities for all residents.

- **IIA9:** To protect and enhance protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.
- **IIA10:** To protect and enhance the borough’s townscapes and landscapes.
- **IIA11:** To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.
- **IIA12:** To reduce the risk and vulnerability to flooding.
- **IIA13:** To maintain and enhance water quality.
- **IIA14:** To protect and enhance air quality.
- **IIA15:** Ensure that Tower Hamlets is resilient to the effects of climate change.
- **IIA16:** To reduce greenhouse gas emissions, support national and local decarbonisation initiatives and encourage energy efficiency.
- **IIA17:** To reduce the amount of waste produced and minimise the amount sent to landfill.
- **IIA18:** To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.

3 IIA Assessment Findings

3.1 Assessment of Policies

- 3.1.1 The assessment of the Local Plan policies was carried out in relation to the IIA Objectives. A summary of the significant effects are detailed in **Table 3-1** below. No significant negative effects were identified.
- 3.1.2 It should be noted that the assessment of policies within themes have been standalone assessments, which purely assess the outcome of the application of those policies rather than their relationship with other policies within the Local Plan.
- 3.1.3 Further details on the assessment of the Local Plan policies can be found within **Section 6** of the main IIA Report and **Appendix F** to the main IIA Report.

Table 3-1 – Summary of Significant Effects – Policy Assessment

Significance	Number of Significant Effects	Summary of Effects
Significant Positive (++)	46	<ul style="list-style-type: none"> • Policies that build inclusive communities through the reduction of social exclusion, promotion of equity and equality, and respect diversity (IIA1). • Policies that could increase physical activity, healthy lifestyles or mental wellbeing, improving health (IIA2). • Policies that could increase employment opportunities, diversify the economy and encourage investment (IIA3). • Policies that improve employment opportunities and access to training (IIA4). • Policies that could increase the borough’s housing provision to meet the needs of residents inclusively (IIA5). • Policies that could improve crime rates and reduce the fear of crime for all residents inclusively (IIA6). • Policies that will promote traffic reduction through the promotion of sustainable transport modes and supporting residents to live more locally (IIA7).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Policies that could protect and enhance access to essential services and facilities (IIA8). • Policies that could result in the protection and enhancement of protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain (IIA9). • Policies that could protect and enhance the borough’s townscapes and landscapes (IIA10). • Policies that could protect and improve assets and their setting within the historic environment (IIA11). • Policies that could reduce the risk and vulnerability of flooding (IIA12). • Policies that could maintain and enhance water quality (IIA13). • Policies that could result in reductions in air pollutants, improving air quality (IIA14). • Policies that could improve the borough’s resilience to the effects of climate change (IIA15).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Policies that encourage net zero developments and could reduce carbon emissions and improve energy efficiency (IIA16). • Policies could reduce the amount of waste produced (IIA17). • Policies that ensure the efficient use of land, sustainable use of resources, and seek opportunities to promote a circular economy (IIA18).
Uncertain (?)	24	<ul style="list-style-type: none"> • Policies that have potential to result in decreases, or increases in car reliance (IIA7). • Policies where development design are unclear and could result in a decrease or increase in biodiversity and natural capital (IIA9). • Policies where visual, setting impacts or disturbance will largely be determined by individual scheme location and design (IIA10). • Policies where the enhancements or negative effects will be determined by scheme level design and location close to heritage assets (IIA11). • Policies where the enhancements or negative effects will be determined by scheme level design and location from areas of high flood risk (IIA12).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Policies where water quality will be determined by the nature and quantity of freight and transport on water. • Policies where measures to reduce GHG emissions and promote renewable energy are unclear. These measures will be determined by scheme level design (IIA16). • Policies where the location and design are unclear and could be resource intensive and generate a significant amount of construction waste (IIA17). • Policies where the location and design are unclear and could result in land take (IIA18).

3.2 Assessment of Site Allocations

3.2.1 The assessment of proposed site allocations was carried out in relation to the IIA Objectives. A summary of the findings is detailed in **Table 3-3** and **Table 3-4** below. The full assessment of proposed site allocations can be found in **Appendix G** to the **main IIA** report.

Table 3-2 - Summary of Significant Effects – Site Allocations Assessment

Significance	Number of Significant Effects	Summary of Effects
Significant Positive (++)	126	<ul style="list-style-type: none"> • Sites that contribute to LBTH’s housing target, provide affordable and adaptable homes, and provide new community facilities (IIA1). • Sites that improve housing provision, opportunities, open spaces and healthcare facilities (IIA2). • Sites that are located close to existing town centres and include retail space (IIA3). • Sites that are located close to existing employment areas and provide employment space (IIA4). • Sites where over 500 homes are provided, contributing towards LBTH’s housing target, at least 35% affordable homes, and accessible homes provided (IIA5).

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Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites that deliver public realm improvements, increase natural surveillance, and include designing out crime principles (IIA6). • Sites that have good access to sustainable transport, high PTAL scores, and improve cycle and pedestrian access (IIA7). • Sites that have good access to transport, improve accessibility, permeability, and wayfinding (IIA8). • Sites that achieve biodiversity net gain through measures such as landscaping and green roofs (IIA9). • Sites that positively contribute to the townscape, provide open space enhancements, and public realm improvements (IIA10). • Sites located on previously developed land, support high-density housing and provide best use of land (IIA18).

Significance	Number of Significant Effects	Summary of Effects
Uncertain (?)	102	<ul style="list-style-type: none"> • Sites where housing provision, size, type and tenure is currently unknown (IIA1). • Sites where housing, healthcare and community space provisions provided are uncertain (IIA2). • Sites where the inclusion of retail space is currently unclear (IIA3). • Sites where it is unclear if employment space will be included within the development (IIA4). • Sites where housing provision, accessibility, size, type and tenure is unclear (IIA5). • Sites where it is unclear if designing out crime principles will be applied (IIA6). • Sites where it is unclear if additional sustainable transport will be included within development (IIA7). • Sites where it is unclear if construction will adversely affect habitats, or if 10% biodiversity net gain will be achieved (IIA9). • Sites where it is unclear if design will improve landscape and townscape settings (IIA10). • Sites that have potential to result in adverse effects on heritage assets, or improvements to the setting of heritage assets, but design details are unclear (IIA11).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites that are located within flood risk areas and it is unclear if mitigation measures will be included within development (IIA12). • Sites that are located close to water bodies but it is unclear if water quality mitigation measures will be included within development (IIA13). • Sites where climate resilience measures are currently unknown (IIA15). • Sites where it is unknown if development will include renewable energy sources or low carbon heat networks (IIA16). • Sites where it is unclear if existing buildings, structures and materials will be reused or recycled (IIA17). • Sites where the density of housing and use of sustainable materials is unknown (IIA18).
Significant Negative (- -)	13	<ul style="list-style-type: none"> • Sites that result in a loss of heritage assets (IIA11). • Sites that are located within flood zone 3 and a flood risk area, and no mitigation measures are outlined (IIA12). • Sites that have high climate risk and no climate resilience measures (IIA15).

3.3 Assessment of Alternatives

Assessment of Alternative Policies

- 3.3.1 The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the preferred plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 3.3.2 The development of the Local Plan policies has not at this stage identified any key policy alternatives, so the assessment of policy alternatives has assessed two scenarios – the continuation of the existing Local Plan and the application of the London Plan.
- 3.3.3 In general, the continuation of the existing Local Plan and London Plan Policies have resulted in less significant positive effects. However, the policies within each plan do remain relevant and the majority are fit for purpose.
- 3.3.4 The London Plan lacks specific borough details, that the local plan can provide, whilst some of the existing Local Plan policies are outdated, and no longer reflect key issues such as the Covid-19 recovery, rising costs of living and increases in crime against women and girls.

Assessment of Alternative Site Allocations

Table 3-3 - Overall impact of all Local Plan site alternatives against IIA Objectives

Significance	Number of Significant Effects	Summary of Effects
Significant Positive (++)	2	<ul style="list-style-type: none"> • Sites that are well connected to community and healthcare facilities and are likely to include additional facilities and open space (IIA2). • Sites that provide additional employment space and are well located close to existing employment opportunities (IIA4).
Uncertain (?)	127	<ul style="list-style-type: none"> • Sites where the provision of homes does not meet the borough’s housing target, the size, type, and tenure of homes is unknown (IIA1). • Sites where the additional provision of community facilities and healthcare facilities is unknown (IIA2). • Sites where it is uncertain if retail or business space will be included within development (IIA3).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites where it is uncertain if employment space will be provided within development (IIA4). • Sites where housing provision is unclear and fall below LBTH's housing target (IIA5). • Sites where it is unclear if designing out crime principles will be applied (IIA6). • Sites where it is unclear if sustainable transport access or improvements will be included within development (IIA7). • Sites where it is unclear if accessible provision to facilities and services will be included within development (IIA8). • Sites where it is unknown if greenspace will be included, or if 10% biodiversity net gain will be achieved (IIA9). • Sites where design details are unknown and it is uncertain if high quality sustainable design and public realm improvements will be achieved (IIA10). • Sites where it is not clear if sensitive design will be implemented (IIA11). • Sites where flood risk mitigation measures are unknown (IIA12).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites where water quality measures are unknown (IIA13). • Sites where climate resilience measures are unknown (IIA15). • Sites where it is unclear if renewable energy or low carbon heat networks will be used (IIA16). • Sites where it is unclear if structures, buildings and materials will be reused or recycled within development (IIA17). • Sites where it is unclear if sites will encourage sustainable use of materials (IIA18).
Significant Negative (- -)	17	<ul style="list-style-type: none"> • Sites with a low PTAL score (between 0 and 1b) and has no proposed improvements to public transport provision (IIA7). • Sites with a low PTAL score (between 0 and 1b) and has the potential to exclude social groups (IIA8). • Sites that have the potential to result in disturbance or loss of heritage assets (IIA11). • Sites located within flood zone 3 and flood risk areas with no mitigation outlined (IIA12).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li data-bbox="663 405 1883 496">• Sites that have high climate and heat risk and have no climate resilience measures outlined (IIA15).

3.4 Findings from other IIA Assessments

EqlA

- 3.4.1 Overall, the policies will likely result in positive impacts on protected characteristic group members in the borough. The policies aim to address a wide range of issues, identified by the key themes within the EqlA baseline.
- 3.4.2 The main protected characteristic groups that will particularly benefit include:
- **Age** – A range of ages groups will experience benefits as a result of the proposed policies. Older people who have reduced mobility, suffer from social isolation and loneliness and require access to health and other services will benefit through improved access to services as well as provision of supported living including care homes. Young people seeking education, training and accessible employment opportunities will also experience positive impacts. Young children are likely to benefit from air quality improvements that numerous policies look to achieve;
 - **Disability** – people with a variety of disabilities including mobility issues will benefit from a more accessible public realm, including open spaces, pedestrian routes and key services. The NLP includes policies which support inclusive design which will help to improve connectivity and function, benefiting users with mobility limitations. The NLP ensures that 10% of all new units are wheelchair accessible, improving access to housing; and
 - **Deprivation** – Policies are likely to benefit people from low-incomes who require improved access to employment, education and housing. Policies geared towards the provision of a wide range of employment opportunities at all levels as well as closing the skills gap through upskilling will be useful to low-income groups who are currently positioned as unable to access higher paid jobs. Additionally, the provision of affordable homes and supported living such as homeless shelters will be beneficial to this group. The ambition of the NLP to deliver an affordable housing target would make a positive impact on deprivation, reducing barriers for low-income families to housing and rental markets.
 - **Gender reassignment, sex and gender and race** - people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.

3.4.3 Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:

- **Age, Disability and Pregnancy and maternity** – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups; and
- **Deprivation** – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.

3.4.4 The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:

- Religion or belief;
- Sexual orientation; and
- Marriage and civil partnerships.

HIA

3.4.5 The HIA assessed the NLP policies and considered their impact on health. These have been detailed below:

- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Future policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads.
- **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, increasing road traffic noise in the area. Improvements to the night-time economy could also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction throughout the borough.

- **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for the Future theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation.
- **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the borough. Additional town centre developments is also likely to reduce unemployment in the borough.
- **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access to education and training.
- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces theme include safety measurements.
- **Access to services:** Positive health effects have been identified. Policies under the Community Infrastructure theme support development proposals to maximise opportunities for the provision of high-quality community facilities.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policies. Green infrastructure could be further promoted through additional requirements under the Homes for the Community theme.

- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

HRA

Stage 1 - HRA Screening (Regulation 18)

- 3.4.6 There are no Habitats sites within LBTH's administrative area, however there are two Habitats that fall within the identified 7.2km Zone of Influence of the borough boundary and as such there will be implications for some of these Habitats sites from the policies of the Local Plan.
- 3.4.7 A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HFC1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 AA. These policies have potential for LSE on nearby Habitats sites relating to increased traffic (and therefore impacts on air quality) and increased public access, recreational and development pressures.
- 3.4.8 Given the possibility of LSE associated with the screened-in interventions, further, detailed assessment was considered necessary to satisfy the requirements of the Habitats Regulations as the Local Plan emerges.
- 3.4.9 It is also not possible to rule out in-combination LSE on Habitats sites as a result of policies in the emerging LBTH Local Plan when considered with other strategic plans based on the findings of the screening assessment and a review of the HRAs supporting Local Plans for adjacent authorities.

Stage 2 - Appropriate Assessment (Regulation 19)

- 3.4.10 At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 3.4.11 Policy BO2 was subject to further consultation with the LBTH and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 3.4.12 Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1, the evidence points towards no impact pathway which could give rise to any significant effects

- 3.4.13 Air quality considerations for Lee Valley Special Protection Area (SPA) and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway.
- 3.4.14 Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plans¹².
- 3.4.15 Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways.
- 3.4.16 Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access.
- 3.4.17 The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 3.4.18 For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified.

¹ Thames Water, Water Resource Management Plan, 2019 [online] available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-report/executive-summary.pdf>

² Thames Water, Revised Draft Water Resources Management Plan, 2024 [online] available at: <https://www.thameswater.co.uk/about-us/regulation/water-resources>

4 Cumulative Effects

- 4.1.1 A cumulative effects assessment was undertaken for the IIA. This looked at two different types of cumulative effects – Intra-project and Inter-project. These are defined as follows:
- Consideration of how different proposed policies and sites within the LBTH may interact and cause cumulative effects on a receptor (Intra-project effects); and
 - How the proposed policies and sites within the LBTH could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-Projects Effects)

4.2 Intra-Project Effects

- 4.2.1 The proposed policies and sites within the Local Plan resulted in the following intra-project cumulative effects. Further details on the assessment of the inter-project cumulative effects can be found within **Section 9.2** of the main **IIA Report**.
- 4.2.2 Positive effects have largely been identified for IIA objectives where policies contribute to improving the current status of the borough, for example, improving biodiversity enhancements, improving energy efficiency or providing additional community infrastructure. Positive effects were identified for biodiversity, greenhouse gases (GHGs), energy efficiency and sustainable resources, climate resilience, historic environment, landscape and townscape, air quality, efficient use of land, water quality, community needs, inclusivity and equality, health and wellbeing, sustainable transport, economy and employment, crime and safety, and housing.
- 4.2.3 Negative effects have been identified for biodiversity, historic environment, flooding, water quality, GHGs, and waste as a result of the scale of development required to meet the borough's housing targets and requirements for employment generation . There is the potential that multiple developments could result in a cumulative amount of construction waste and emissions of GHGs. Construction of these developments may occur in close proximity to heritage assets and conservation, or increase the risk of flooding due to the cumulative increase in hardstanding surfaces. Additionally, the loss of land required for sites and housing allocation may segregate and damage habitats, resulting in a loss of habitats.

4.2.4 Mixed positive and negative effects were identified for human health, biodiversity and natural capital, landscape and townscape, historic environment, flooding, water quality, air quality, climate change, greenhouse gases, waste, and efficient use of resources.

4.3 Inter-Project Effects

4.3.1 An assessment of the potential cumulative effects of the Local Plan in association with other plans, policies and projects in the surrounding area was completed, looking at the potential impacts at a strategic level. Further details on the assessment of the inter-project cumulative effects can be found within **Section 9.3** of the main **IIA Report**.

4.3.2 The following plans were considered:

- The London Plan, 2021;
- Crossrail 2;
- Liverpool Street Station Redevelopment
- 55 Bishopsgate
- One Exchange Square
- Mayor of London, Mayor’s Transport Strategy, 2018;
- Neighbouring Local Plans (detailed within **Section 9.3** of the main **IIA Report**); and
- Neighbouring Local Transport Plans, Strategies and Implementation plans (detailed within **Section 9.3** of the main **IIA Report**).

4.3.3 Potential positive effects were identified for population and equalities, human health, economy and employment, housing, crime and safety, transport, accessibility, air quality, and climate change.

4.3.4 Potential negative effects were identified for landscape and townscape, historic environment, air quality, and waste.

4.3.5 Potential mixed positive and negative effects were identified for population and equalities, human health, biodiversity and natural capital, landscape and townscape, historic environment, flooding, water quality, air quality, climate change, greenhouse gases, waste, and efficient use of resources.

5 Mitigation, Enhancements and Monitoring

5.1 Mitigation and Enhancement Measures

- 5.1.1 Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of IIA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan.
- 5.1.2 Proposed mitigation and enhancement measures have been set out in **Table 5-1** below.

Table 5-1 -Proposed Mitigation and Enhancement Measures

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA1 - Population and Equalities	Inclusive mobility guidance should be adhered to ensure designs are accessible for everyone.	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA2 - Human Health	The loss of community facilities to make way for site allocations should be avoided. Where a loss can't be mitigated, these should be reprovioned elsewhere.	Inclusion within preferred Local Plan policies Project level design and assessment Community engagement
IIA1 - Population and Equalities IIA2 - Human Health	Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities.	Project level design and assessment as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA4 – Employment and skills	Employment should be focused on local residents in the first instance. Policies should aim to increase employment for all protected groups where barriers to employment and education exist (low-incomes, younger people, disabled).	Inclusion within preferred Local Plan policies
IIA1 - Population and Equalities	Community safety, health and equalities should be considered in design, for example, pedestrian networks, including linking new developments into existing infrastructure, lighting and other	Inclusion within Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA2 - Human Health IIA6 – Crime and Safety	safety design considerations, materials used (contrasting colours, non-slip surfaces), accessibility for all including those with reduced mobility or disability, well-being, affordability of schemes, active travel.	Project level Community Safety Assessment, EqIA and HIA as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA7 – Sustainable Transport IIA8 - Accessibility	<p>Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people and low income groups, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p> <p>The Local Plan should also support community engagement with various groups prior the development of transport infrastructure.</p>	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA as part of subsequent EIA/ planning application Tower Hamlets Transport Strategy 2019-2041 The Mayor’s Transport Strategy
IIA1 - Population and Equalities IIA2 – Health and Wellbeing	Where policies and site allocations make provision for open spaces and public realm improvements, there is a need for these spaces to be well designed and well lit, to ensure that they are safe and feel safe for all users, particularly after dark.	Inclusion within preferred Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA6 – Crime and Safety	<p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p> <p>Accessible surfacing should be considered for wheelchair users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p>	<p>Project level design and assessment as part of subsequent EIA/ planning application</p> <p>Community engagement</p>
IIA1 - Population and Equalities IIA10 - Landscape and Townscape	<p>Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs.</p>	<p>Project level design and assessment as part of subsequent EIA/ planning application</p>
IIA3 – Economy and Town Centres	<p>Where sites are located within or in close proximity to local and neighbourhood shopping centres/ parades it is imperative that development does not detrimentally impact on the vitality of the designated centre.</p>	<p>Project level design and assessment</p> <p>Community engagement</p>
IIA3 – Economy and Town Centres IIA4 – Employment and Skills	<p>The loss of businesses should be avoided. Where it cannot be avoided, discussions with owners should be undertaken to ensure suitable alternative locations are identified and/or adequate compensation is provided particularly where businesses may need to be temporarily closed or relocated during construction.</p>	<p>Inclusion within preferred Local Plan policies</p> <p>Community engagement</p> <p>Project level design and assessment</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.	
IIA4 – Employment and skills	Where new development comes forward in close proximity to existing shop frontages and businesses, there’s a need to ensure that they can remain open and maintain their existing business hours.	Inclusion within Local Plan policies Project level design and assessment as part of subsequent EIA/ planning application
IIA6 – Crime and Safety	<p>Development should incorporate designing out crime principles, particularly for those potential development sites located in areas with high levels of crime deprivation.</p> <p>Although crime is incorporated within the Local Plan, it currently doesn’t currently have its own standalone policy. Given the high levels of crime in some areas of the borough, reductions in crime could be better supported by planning policies.</p> <p>Development should consider the Handbook Creating Places That Work For Women and Girls³.</p>	<p>Incorporation within the Local Plan policies</p> <p>Project level design and assessment as part of subsequent EIA/ planning application</p>

³ London Legacy Development Corporation, Creating places that work for women and girls, Handbook for Local Authorities, Developer and Designers, July 2024 [online] <https://www.queenelizabetholympicpark.co.uk/about-us/how-we-work/handbook-creating-places-work-women-and-girls>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA9 – Biodiversity and Natural Capital	<p>Consideration needs to be given to the potential effects of construction of developments (noise, vibration and air pollution) on biodiversity.</p> <p>A Lighting Strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p>	<p>Inclusion within Local Plan policies</p> <p>Project level design and assessment (including noise assessments/ surveys)</p> <p>Lighting Strategy</p>
IIA9 – Biodiversity and Natural Capital	<p>For those sites that incorporate existing green space, Phase 1 habitat surveys should be undertaken to identify any habitats and species.</p>	<p>Project level assessment</p>
IIA10 - Landscape and Townscape	<p>Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.</p> <p>As outlined in the draft Tall Buildings SPD⁴ Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact</p>	<p>Scheme level design and planning application</p> <p>Application of the Tall Buildings SPD</p>

⁴ London Borough of Tower Hamlets, Tall Buildings SPD, Consultation Draft [online] available at: <https://talk.towerhamlets.gov.uk/tallbuildings>

IIA Objective	Mitigation/ Enhancement	Mechanism
	assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).	
IIA10 - Landscape and Townscape IIA11 - Historic Environment	New developments should seek to maximise sustainability benefits from existing landscape, townscape and heritage assets by valuing them inherently and for the wider services they provide. Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. Development proposals in designated views should comply with London Plan Policy HC4.	Historic Landscape Characterisation Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA10 - Landscape and Townscape	Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.	Project level design and planning applications
IIA11 - Historic Environment	Promoters and designers should liaise closely with Tower Hamlets and Historic England to avoid or minimise negative effects, such as land take and light pollution, whilst seeking to maximise benefits, such as tranquillity. Where developments are being built and/or improved within, or close proximity to designated historic assets, visual effects assessment should be undertaken to determine magnitude of impact and possible mitigation.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA11 - Historic Environment	Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA11 – Historic Environment	<p>Characterisation work should be undertaken to understand the potential impact of site allocations on historic places and inform assessments of an area’s capacity to accommodate development.</p> <p>Site specific studies, such as archaeological desk-based assessment and fieldwork, may also be necessary to provide adequate information.</p>	Historic Landscape Characterisation Archaeological desk based assessment
IIA10 - Landscape and Townscape IIA11 - Historic Environment	Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes.	Historic Landscape Characterisation Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application
IIA10 - Landscape and Townscape	Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.	Scheme level design as part of subsequent EIA/ planning application

IIA Objective	Mitigation/ Enhancement	Mechanism
	As outlined in the draft Tall Buildings SPD ⁵ Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).	
IIA14: Air Quality	A Dust Management Plan should be compiled prior to demolition and construction of new sites.	Project level Construction Environmental Management Plan (CEMP)
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions	Development should ensure design that is resilient to the current and future risks of climate change i.e. extreme heat, cold and precipitation. This could include the use of locally available, renewable, or reclaimed resources, as these are often more resilient. New developments should incorporate renewable energy generation	Project level design and assessment as part of subsequent EIA/ planning application

⁵ London Borough of Tower Hamlets, Tall Buildings SPD, Consultation Draft [online] available at: <https://talk.towerhamlets.gov.uk/tallbuildings>

IIA Objective	Mitigation/ Enhancement	Mechanism
	methods, such as solar panels, to reduce the carbon emissions of the site.	
IIA12 – Flood Risk	<p>Sequential testing should be undertaken, to avoid sites with the highest flood risk. Where this isn't viable and proposed sites are located within flood zones 2 or 3 a full flood risk assessment should be undertaken.</p> <p>Scheme level design should also consider the incorporation features to reduce flood risks, both now and in future, in light of future precipitation changes associated with climate change. This could include features such as sustainable urban drainage solutions (SuDs), permeable paving and natural engineering such as tree planting.</p>	<p>Project specific transport plans/assessments as part of subsequent EIA/ planning application</p> <p>Incorporation within the Local Plan policies</p>
IIA12 – Flooding	Flood Risk Assessments should be undertaken for all developments located in Flood Zone 2 or 3. The inclusion of SuDS should be implemented where developments are located in flood zones.	Project level design and assessment as part of subsequent EIA/ planning application
IIA13 – Water Quality IIA18 – Waste	Vessels used to facilitate the movement of waste will need to adhere to the Maritime and Coastguard Agency Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations 2008 and other best practice to minimise pollution and effects on water quality.	Project level design and assessment as part of subsequent EIA/ planning application

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions IIA17 – Waste IIA18 – Efficient use of resource	<p>Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy and should consider BREEAM and BREEAM Infrastructure.</p> <p>Sustainable design and construction techniques should be promoted, such as low energy lighting and opportunities for renewable energy regeneration.</p>	<p>Project level design and assessment as part of subsequent EIA/ planning application</p> <p>CEMP/ OEMP</p>
IIA17 – Waste IIA18 – Efficient use of resource	<p>Proposed sustainable transport infrastructure such as cycle lanes, bus lanes and footpaths, should where appropriate, prioritise the reallocation of the highway network.</p>	<p>Project level design and assessment as part of subsequent EIA/ planning application</p> <p>Tower Hamlets Transport Strategy 2019-2041</p>
IIA17 – Waste IIA18 – Efficient use of resource	<p>A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).</p>	<p>Project level design and assessment – CEMP and OEMP</p>

5.2 Monitoring Measures

- 5.2.1 The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of applying the plan can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.
- 5.2.2 The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the IIA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:
- IIA1 and IIA2: The effects of a growing population on community facilities and services;
 - IIA5: The number of affordable and adaptable homes delivered;
 - IIA9: The number of new developments achieving biodiversity net gain from January 2024;
 - IIA10: The potential effects on key views;
 - IIA12: Flood risk of new development monitored through the Strategic Flood Risk Assessment;
 - IIA16: Levels of embodied carbon from new development; and
 - IIA18: Levels of waste generations on new developments.
- 5.2.3 It should be noted that these uncertain effects are generally where limited scheme information is currently available.
- 5.2.4 **Table 5-2** below sets out those monitoring measures which could be suitable in monitoring those uncertain residual effects outlined above. Targets have either been taken from the Local Plan or the London Plan.

Table 5-2 - Proposed Monitoring Measures

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
<p>IIA1 and IIA2: The effects of a growing population on community facilities and services</p>	<p>The number of new healthcare and community services provided.</p> <p>Ratio of patient-to-staff numbers at GP practices</p>	<p>No targets included as part of the Local Plan or London Plan</p> <p>The Infrastructure Delivery Plan may include targets. This will be delivered alongside the Local Plan.</p>
<p>IIA5: The number of affordable and adaptable housing provided</p>	<p>The number/ percentage of affordable homes being delivered within the borough.</p> <p>The number/ percentage of adaptable homes or specialist accommodation being delivered within the borough.</p>	<p>Policy HF2 of the Local Plan:</p> <ul style="list-style-type: none"> ■ Deliver a minimum of 40% affordable housing (by habitable room) on-site when seeking to provide 10 or more new residential units; ■ Deliver a minimum of 50% affordable housing (by habitable room) on-site through the redevelopment of affordable housing, estate regeneration schemes and industrial land for residential use; and ■ Deliver the required amount of affordable homes in accordance with a 85% social homes and 15% intermediate homes tenure split. <p>Policy D7 of the London Plan:</p>

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
		Delivery of at least 10% of dwellings meet Building Regulation requirement M4(3) ⁶ 'wheelchair user dwellings'
IIA9: The number of new developments achieving biodiversity net gain	The number of new developments achieving biodiversity net gain	Policy BO4 of the Local Plan: To deliver a minimum 2.5 biodiversity unit per hectare increase or 30% gain (whichever is higher) in habitat value for wildlife compared with the pre-development baseline
IIA10: The potential effects on key views	Number of tall building applications granted planning permission within key view areas/ protected views	No targets included as part of the Local Plan or London Plan

⁶ HM Government, The Building Regulations, Access to and Use of Buildings (M), 2011 [online] available at: https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
IIA11: Potential negative effects from new developments on heritage assets	Number of buildings on the 'At Risk Register'. Number of applications granted planning permission contrary to advice from Historic England.	No targets included as part of the Local Plan or London Plan
IIA12: Flood Risk	Number of Environment Agency objections to planning applications.	No targets included as part of the Local Plan or London Plan
IIA16: Levels of embodied carbon from new development.	The number of development proposals that meet London's Energy Transformation Initiative (LETI) 2020 best practice embodied carbon emission targets	Policy CG4 of the Local Plan: <ul style="list-style-type: none"> ■ Domestic buildings should achieve embodied carbon limits of 500kg CO2/m2 or less; and ■ Non-domestic buildings should achieve embodied carbon limits of 600kg CO2/m2 or less.

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
<p>IIA18: Uncertain effects of waste generations on new developments</p>	<p>The amount of construction and demolition waste going to landfill</p> <p>The number of new developments which incorporate waste saving initiatives</p> <p>Household and commercial waste and recycling figures for the borough</p>	<p>As per Policy SI7 of the London Plan:</p> <ul style="list-style-type: none"> ■ Zero biodegradable or recyclable waste to landfill by 2026 ■ Meet or exceed the municipal waste recycling target of 65% by 2030 ■ Meet or exceed the targets for each of the following waste and material streams: <ul style="list-style-type: none"> • a) construction and demolition – 95% reuse/ recycling/ recovery • b) excavation of material – 95% beneficial use

6 Next Steps

- 6.1.1 LBTH is seeking the views of statutory bodies, the public and other stakeholders on the results of the IIA. Consultation at this stage continues to ensure that the IIA provides a robust assessment of the Local Plan.
- 6.1.2 This IIA Interim Report will be issued to consultees for consultation alongside the preferred Local Plan (Regulation 19 Consultation) in summer 2024.
- 6.1.3 An indicative timetable of the remaining stages of the IIA and Local Plan have been included in **Table 6-1** below.

Table 6-1 – Indicative Local Plan and IIA Timetable

IIA/ Local Plan Stages	Timescales
Regulation 19 Consultation (IIA Stage D)	Summer 2024
Examination (IIA Stage D)	Early 2025
IIA Post Adoption Statement (Stage E)	Autumn/Winter 2025



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Tower Hamlets Borough Council

New Local Plan

Integrated Impact Assessment Report



Tower Hamlets Borough Council

New Local Plan

Integrated Impact Assessment Report

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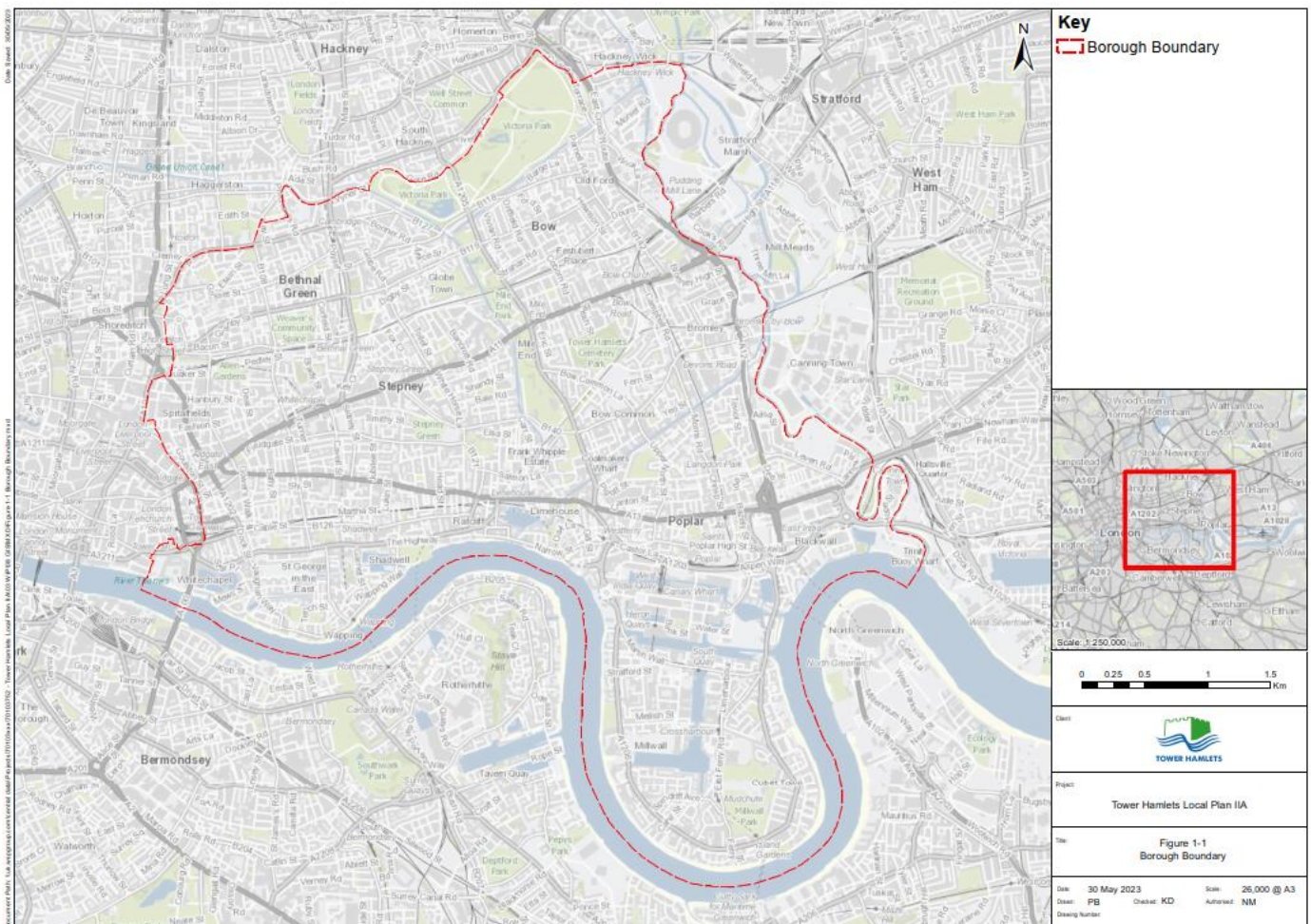
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1 Introduction

1.1 Overview

- 1.1.1. The London Borough of Tower Hamlets (here in referred to as LBTH) is in the process of preparing a new Local Plan for the borough. The new Local Plan will set out how development will be planned and managed across the borough through to 2038.
- 1.1.2. It will set out how the borough can sustainably develop, identifying the number of new homes, jobs and facilities needed to support the growing and changing population, as well as protecting all the features that the borough’s communities cherish, such as town centres, parks and open spaces, waterways, cultural and historic buildings.
- 1.1.3. The borough boundary and the spatial extent of the new Local Plan is set out in **Figure 1-1** below.

Figure 1-1 - LBTH Borough Boundary



1.2 Local Plans

- 1.2.1. Section 3 of the National Planning Policy Framework (NPPF)¹ requires that each local planning authority should prepare a local plan for its area, which guides decisions on future development proposals and addresses the needs and opportunities of the area.
- 1.2.2. Topics that local plans usually cover include housing, employment and shops and they also identify where development should take place and areas where development should be restricted. Once in place, local plans become part of the statutory development plan, which is the starting point for determining local planning applications.
- 1.2.3. Paragraph 15 of the NPPF states that the *'planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities'*.
- 1.2.4. Part 2 of the Town and Country Planning Regulations 2012 makes provision in relation to the local plan and supplementary planning documents. Parts 4 and 5 of these regulations prescribe the form and content of local plans and supplementary planning documents (to be prepared by local planning authorities) and prescribes which documents are to be local plans.
- 1.2.5. The Local Plan must also be in 'general conformity' with the London Plan, and where appropriate, take account of Supplementary Planning Guidance (SPG). The Mayor of London produces other strategies to sit alongside the London Plan².

1.3 Purpose of this Report

- 1.3.1. LBTH has commissioned WSP to undertake an Integrated Impact Assessment (IIA) which will ensure that sustainability aspects are incorporated into their Local Plan. The IIA combines the following assessment processes:
 - Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment - SEA);
 - Equalities Impact Assessment (EqIA);
 - Health Impact Assessment (HIA); and
 - Habitats Regulations Assessment (HRA).
- 1.3.2. An integrated assessment approach enables synergies and cross-cutting impacts to be identified, avoiding the need to undertake and report on separate assessments and seeking to reduce any duplication of assessment work. A single process can improve efficiencies in

¹ Ministry of Housing, Communities and Local Government Framework, National Planning Policy Framework, 2021 [online] available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² Mayor of London, The London Plan, 2021 [online] available at: <https://www.london.gov.uk/programmes-strategies/planning/london-plan>

the assessment itself, as many of the issues covered in the different forms of assessment overlap. This process also helps to simplify outcomes and recommendations for policymakers.

1.3.3. More detail on the IIA methodology is provided in **Section 3**.

1.3.4. This report sets out the second stage of the IIA/ local planning process, which is the assessment of the preferred Local Plan and preparation of the IIA Report (IIA Stage C). This stage includes the following:

- Assessment of preferred policies, objectives and spatial options;
- Assessment of reasonable alternatives;
- Assessment of cumulative effects;
- Outlining mitigation and enhancement measures;
- Outlining recommendations; and
- Setting out next steps.

2 The New Local Plan

2.1 Background

- 2.1.1. The new Local Plan will set out the vision for the future of the borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of the environment, green spaces and cultural and historic assets.
- 2.1.2. Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the borough will develop through to 2038.

2.2 Work to Date

- 2.2.1. Work on the new Local Plan started in early 2022. Public consultation has already taken place to develop LBTH's new Local Plan.
- 2.2.2. Early engagement took place from Wednesday 25th January 2023 to Wednesday 8th March 2023 through the Early Engagement Platform, to seek the views of LBTH's varied communities and stakeholders about the future of the borough and what the local plan should contain. This was an important stage to ensure the local plan is shaped by early and effective engagement with a wide range of groups.
- 2.2.3. The public also had the option of attending one of the three online webinar sessions, an in-person public engagement session, in-person or virtual drop-in sessions, or by providing written comments by email and/or post. This early engagement is the start of the discussion which will support the production of the new Local Plan. The public's input is a valuable part of the preparation process and will inform the development of new policies.
- 2.2.4. Feedback from both public consultations has been used to shape this draft new Local Plan. It sets out a shared vision for the future of the borough and includes the proposed strategy and planning policies that will help guide and manage development in the area over the new Local Plan period (2023 to 2038).
- 2.2.5. The IIA Scoping Report was undertaken in April 2023, which set out the baseline and identified key issues and opportunities for the borough and the Local Plan. This underwent a separate consultation with the statutory consultees (Environment Agency, Historic England and Natural England) in which feedback was received on both the IIA process and the Local Plan.
- 2.2.6. LBTH consulted on the first draft version of the local plan, which was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning)

(England) Regulations 2012³, and ran between the 6th of November and the 18th of December 2023. An Interim Integrated Impact Assessment was undertaken in support of this and was consulted on alongside the first draft version of the local plan.

2.2.7. Since consultation, the Local Plan has been revised and refined and this Report represents the assessment of the updated Preferred Local Plan for Regulation 19 consultation.

The indicative timeline for delivery of the Local Plan is shown in **Figure 2-1** below.

Figure 2-1 - Local Plan Timeline



³ UK Government, The Town and Country Planning (Local Planning) (England) Regulations 2012, [online] available at: https://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf

2.3 Local Plan Vision and Objectives

2.3.1. The proposed vision for LBTH is set out in **Box 2.1** below.

Box 2-1 – Local Plan Vision

Our Proposed Vision for Tower Hamlets

Our vision for Tower Hamlets is to build a brighter future, to empower the next generation, and to promote a multicultural and diverse community that thrives within mixed, cohesive, and inclusive neighbourhoods. The council will prioritise inclusivity for people of all ethnicities, faiths, genders and sexual orientation, walks of life, designing our places to ensure that people are put first within the highest quality environments that meet the needs and ambitions of all our communities.

The council will strive to address overcrowding in the borough and meet the range of housing needs of our community by delivering a significant amount of high-quality new homes. The issues caused by overcrowding including poorer health and educational outcomes, increased impacts on mental health and greater incidences of depression and anxiety will be mitigated with the focus on an increased capacity for housing. We will consider a mix of housing products, types, tenures, layout, and size to best match the borough's population, with a focus on affordable and social housing, particularly family homes that can meet the needs of our overcrowded residents. We will seek to focus on the delivery of affordable and social housing through a 40% target on development sites to tackle the overcrowding and housing crisis.

Tower Hamlets will work towards a clean and green future where carbon emissions and overall energy usage are reduced. We will prioritise the reuse and adaptation of buildings and where not feasible, the recycling of building materials. We will support walking and cycling links alongside the use of, and improvements to, the public transport network. The transport needs of all residents will be considered as part of future development opportunities, particularly where this supports mobility needs or for the purposes of employment. The borough's network of green and blue spaces, including Victoria Park, Mile End Park, Mudchute Park, the Thames, River Lea, Dock Basins, and canals, will provide opportunities for leisure, relaxation, and entertainment with a variety of uses encouraged to support health and well-being while still ensuring their enjoyment and function as open spaces is retained.

The borough, having regained the planning powers for parts of Bromley-by-Bow, Fish Island, and Hackney Wick from the London Legacy Development Corporation (LLDC)⁴, will continue to integrate and grow the distinctive opportunities these areas offer.

⁴ The LLDC came into being on April 1, 2012. From October 1 2012 the LLDC became the Local Planning Authority for the Olympic Park and surrounding neighbourhoods, which includes Bromley-by-Bow and Fish Island. The LLDC functions and responsibilities include those related to plan making and decision making.

The borough’s small businesses, start-ups, and markets including Whitechapel Market, Petticoat Lane Market, Bethnal Green Markets, Roman Road Market, Columbia Road Market, Watney Market, Crisp Street Market, Brick Lane Market, and other local traders will be prioritised and at the heart of decision-making. The key employment areas of Canary Wharf, Whitechapel, and the City Fringe will continue to evolve into dynamic centres of innovation and global hubs for the financial, technology, professional, life-sciences, biotech, and digital sectors. The continued benefits of the Elizabeth line arrival will further unlock the unique opportunities available within the borough. A community wealth building approach will be adopted, alongside the provision of genuinely affordable workspace will be prioritised for local small businesses, local start-ups, makers, the creative industries, and emerging and thriving small and medium-sized enterprises.

We will identify and coordinate the provision of infrastructure necessary to support our growing population, including promoting the delivery of new parks, public transport improvements, educational, health, community, cultural, and recreational facilities across the borough.

Our unique town centres, markets, historical, and cultural attractions will be revitalised to support local communities and become some of London's top attractions. With the borough's growing population, young people will be at the forefront of anticipated regeneration with jobs, homes, spaces, and environments geared towards their success.

Exceptional design and architectural innovation will be ensured across the borough to ensure our distinct buildings, skylines, and streetscapes provide a high-quality environment for our residents and remain a recognisable feature of London. We will celebrate the vibrant history and urban landscape of Tower Hamlets through thoughtful design and placemaking, highlighting our rich, historic, and significant character areas. Tower Hamlets will emerge from the economic impacts of the COVID-19 pandemic and Brexit to maintain its status as an international hub for business, culture, and tourism. Our unique location, with strong links to the City of London, Stratford, London City Airport, and beyond, will allow for a rich mix of strategic functions that benefit the community.

By 2038, Tower Hamlets will have made significant strides in addressing overcrowding, delivered thousands of new homes to support the community, provided opportunity for markets and small local businesses to thrive, and improved the overall health and safety of residents. The borough will have continued to play a role in supporting London’s growth and economy through sustainable development. The borough’s strong and inclusive communities will be thriving within healthy environments, ensuring a brighter future for all.

2.3.2. The Local Plan’s strategic objectives provide a link to the delivery of the vision for Tower Hamlets. These objectives address the key challenges of the borough over the 15-year plan period. The objectives have been informed by and reflect many of the key documents prepared by the council, including the Strategic Plan (2022-2026)⁵. These objectives are as follows:

- Empowering our communities culturally, economically, and politically
- Tackling overcrowding and housing in our borough
- Supporting young people and accelerating education
- A thriving local and global economy that boosts jobs, skills, businesses and tackles inequalities
- Securing infrastructure delivery to protect and strengthen public services
- A clean and green future
- Healthy, safe and inclusive neighbourhoods

2.4 Local Plan Policies

2.4.1. In total the draft Local Plan puts forward 72 policies across 10 themes. These themes and policies have been outlined in **Table 2-1** below. Strategic policies have been denoted by an asterisk. These are the policies which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004⁶.

Table 2-1 – Proposed Draft Local Plan Policies

Draft Local Plan Policies
<i>Delivering the Local Plan</i>
DV1 - Areas of growth and opportunity within Tower Hamlets
DV2 - Delivering sustainable growth in Tower Hamlets
DV3 – Healthy Environments
DV4 - Planning and construction of new development

⁵ The Strategic Plan is the council’s main plan. It sets out the most important priorities for the council between 2022 and 2026. These priorities are translated from the Mayor’s vision and the administration’s manifesto. All local authorities must deliver certain services and make decisions: these are set out in law. The plan also includes important actions that the council will take to make sure these services and decisions are the best they can be.

⁶ UK Government, Planning and Compulsory Purchase Act 2004 [online] available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents>

Draft Local Plan Policies
DV5 - Developer contributions
DV6 – Social value
DV7 – Utilities and digital connectivity
DV8 – Site allocations
<i>Homes for the Community</i>
HF1 – Meeting housing needs
HF2 – Affordable housing and housing mix
HF3 – Protection of existing housing
HF4 – Support and specialist housing
HF5 – Gypsy and traveller accommodation
HF6 – Purpose-built student accommodation
HF7 – Large-scale purpose-built shared living
HF8 – Housing with shared facilities (houses in multiple occupation)
HF9 – Housing Standards and Quality
<i>Clean and Green Future</i>
CG1 – Mitigating and adapting to a changing climate
CG2 – Low energy buildings
CG3 – Low carbon energy and heating
CG4 – Embodied carbon, retrofit and the circular economy

Draft Local Plan Policies
CG5 – Overheating
CG6 – Managing flood risk
CG7 – Sustainable drainage
CG8 – Water efficient design
CG9 – Air quality
CG10 – Noise and vibration
CG11 – Contaminated land
<i>People Places and Spaces</i>
PS1 – Design and infrastructure-led approach to development
PS2 – Tall Buildings
PS3 – Securing design quality
PS4 – Attractive streets, spaces and public realm
PS5 – Creating inclusive spaces
PS6 – Heritage and the historic environment
PS7 – World heritage sites
PS8 – Shaping and managing views
PS9 – Shopfronts
PS10 – Advertisements, hoardings and signage
PS11 – Siting and design of telecommunications infrastructure

Draft Local Plan Policies
<i>Inclusive Economy and Good Growth</i>
EG1 – Creating investment and jobs
EG2 – New employment space
EG3 – Affordable workspace
EG4 – Loss and redevelopment of employment space
EG5 – Railway Arches
EG6 – Data Centres
<i>Town Centres</i>
TC1 – Supporting the network and hierarchy of centres
TC2 – Protecting the diversity, vitality and viability of town centres
TC3 – Town centre uses outside centres
TC4 - Markets
TC5 – Food and drink
TC6 – Entertainment uses
TC7 – Evening and night-time economy
TC8 – Short-stay accommodation
<i>Community Infrastructure</i>
CI1 – Support community facilities
CI2 – Existing community facilities

Draft Local Plan Policies
CI3 – New and enhanced community facilities
CI4 – Public houses
CI5 – Arts and Culture facilities
<i>Biodiversity and open space</i>
BO1 – Green and blue infrastructure
BO2 – Open spaces and the Green Grid networks
BO3 – Water spaces
BO4 – Biodiversity and access to nature
BO5 – Urban greening
BO6 – Play and recreation spaces
BO7 – Food growing
<i>Movement and Connectivity</i>
MC1 – Sustainable travel
MC2 – Active travel and healthy streets
MC3 – Impacts on the transport network
MC4 – Parking and permit-free
MC5 – Sustainable delivery, servicing and construction
<i>Reuse, Recycling and Waste</i>
RW1 – Managing our waste

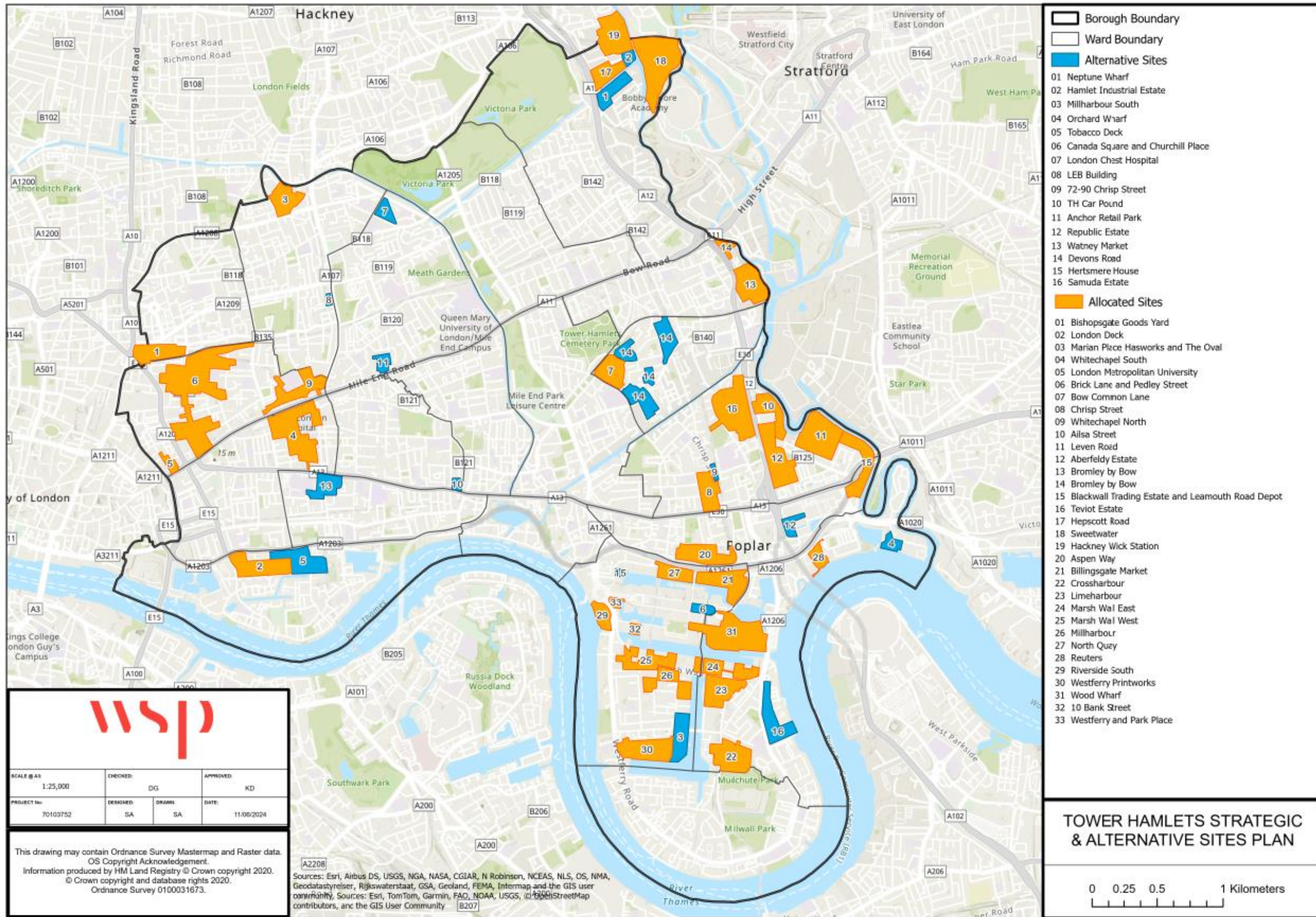
Draft Local Plan Policies
RW2 – New and enhanced waste facilities
RW3 – Waste collection facilities in new development

2.5 Local Plan Site Allocations and Alternatives

- 2.5.1. A key part of the local planning process is to identify key sites for development. The Local Plan proposes 32 site allocations, which are set out in **Figure 2-2** overleaf.
- 2.5.2. All proposed development sites underwent an initial sifting process by LBTH which identified potential key constraints as well as its ability to achieve a minimum of 500 new homes. Sites include those that have been previously allocated as part of the existing local plan and the LLDC Local Plan⁷ as well as those that have come forward since the adoption of these plans.
- 2.5.3. It should be noted that some of the proposed site allocations may be subject to further viability testing, but it is assumed that they will be able to achieve a minimum of 500 new homes.
- 2.5.4. As part of the SEA Regulations, reasonable alternatives need to be considered. The proposed site alternatives include those sites that are developable but do not meet the 500 minimum capacity targets of the proposed site allocations. There are 16 sites in total. These sites have the potential to come forward as windfall sites in the future if the proposed site allocations above do not provide adequate housing numbers.

⁷ LLDC Local Plan 2020-2036 [online] available at: <https://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/local-plan-2020-2036>

Figure 2-2 - Proposed Site Allocations and Alternatives



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3 Methodology

3.1 Introduction

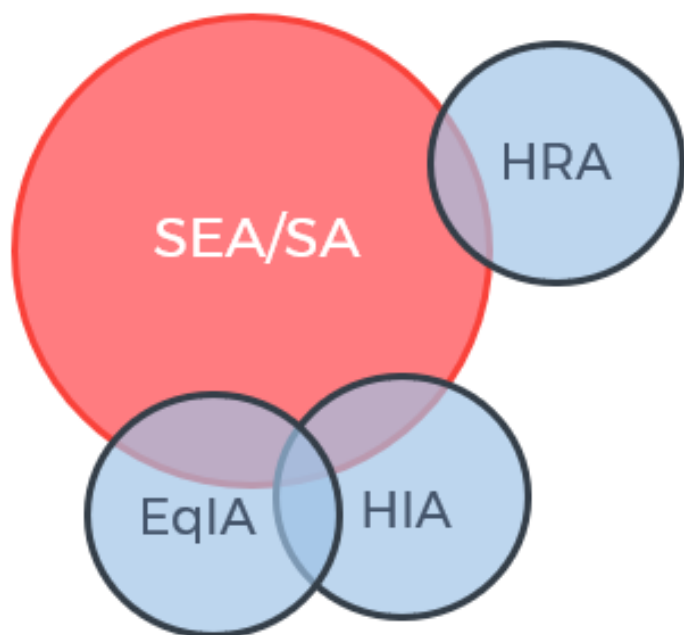
3.1.1. Sustainability Appraisal is a systematic process that is undertaken during the preparation of a plan. Its role is to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.

3.1.2. The IIA combines the following assessment processes:

- Strategic Environmental Assessment (SEA);
- Sustainability Appraisal (SA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA).

3.1.3. **Figure 3-1** below shows the relationship of each of these IIA elements.

Figure 3-1 - Relationship of IIA Elements



3.2 Sustainability Appraisal

- 3.2.1. The SEA/SA process is carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which emerging plans will help to achieve relevant environmental, economic and social objectives.
- 3.2.2. SEA is used to describe the application of environmental assessment to plans and programmes in accordance with the 'Environmental Assessment of Plans and Programmes Regulations' (SI 2004/1633, known as the SEA Regulations)⁸.
- 3.2.3. SEA is mandatory for plans and programmes which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste or water management, telecommunications, tourism, town and country planning or land use, and which set the framework for future development consent of projects listed in the Town and Country Planning (Environmental Impact Assessment) Regulations⁹.
- 3.2.4. SEA only considers the environmental effects of a plan whilst SA also considers a plan's wider economic and social effects. It is obligatory that SAs meet all of the requirements of the SEA Regulations.
- 3.2.5. The approach adopted for the SA element of the Local Plan follows that set out in the Practical Guide to SEA¹⁰ and the Planning Practice Guidance to SEA¹¹. SAs do however need to meet all of the requirements of the SEA Regulations, so a separate strategic environmental assessment should not be required.

3.3 Equalities Impact Assessment

- 3.3.1. The Equality Act 2010¹² includes a public-sector equality duty that requires public organisations and those delivering public functions to: '*show due regard to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity; and foster good relations between communities*'.
- 3.3.2. The EqIA process focuses on assessing and recording the likely equalities effects as a result of a policy, project or plan. It seeks to ensure that the policy, project or plan does not discriminate or disadvantage people and enables consideration of how equality can be

⁸ SI 2004 No. 1633, The Environmental Assessment of Plans and Programmes Regulations 2004 [online] Available at: http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf

⁹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [online] Available at: <http://www.legislation.gov.uk/ukxi/2017/571/introduction/made>

¹⁰ Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive. available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

¹¹ Department for Communities and Local Government (2015) Strategic environmental assessment and sustainability appraisal. Available at: <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

¹² Equality Act, 2010, [online] available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents>

improved or promoted. The Equality Duty came into force in April 2011 and covers the following nine Personal Protected Characteristics:

- Age;
- Disability;
- Gender;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief; and
- Sexual orientation.

3.4 Health Impact Assessment

- 3.4.1. HIA is a process to identify the likely health effects of plans, policies or developments and to implement measures to avoid negative impacts and promote opportunities to maximise the benefits. There is no formally adopted methodology for HIA although there is a body of practice and guidance at a policy level. Assessment of health can be undertaken as a discrete process within an HIA and can also be embedded within environmental assessments.
- 3.4.2. HIA is not a statutory requirement of the Local Plan preparation process. However, Planning Practice Guidance¹³ states that ‘Local planning authorities should ensure that health and wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making’.
- 3.4.3. HIAs can be done at any stage in the development process but are best done at the earliest stage possible.

3.5 Habitat Regulations Assessment

- 3.5.1. Under Article 6(3) of the European Union Habitats Directive¹⁴ as transposed into the UK law by the Habitats Regulations¹⁵, an assessment (referred to as an HRA) needs to be undertaken in respect of any plan or project which:

¹³ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, Planning Practice Guidance, Healthy and Safe Communities, 2014 [online] available at:

<https://www.gov.uk/guidance/health-and-wellbeing>

¹⁴ European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, 1992 [online] available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701>

¹⁵ The Conservation of Habitats and Species Regulations 2017, [online] Available at: <http://www.legislation.gov.uk/ukxi/2017/1012/contents/made>

- 3.5.2. “Either alone or in combination with other plans or projects would be likely to have a significant effect on a site designated within the Natura 2000 network – these are Special Areas of Conservation (SACs), candidate SACs (cSACs), and Special Protection Areas (SPAs). In addition, Ramsar sites (wetlands of international importance), potential SPAs (pSPA) and in England possible SACs (pSACs), are considered in this process as a matter of law or UK Government policy. These sites are collectively termed ‘European sites’ in Habitats Regulations Assessment (HRA); and is not directly connected with, or necessary to, the management of the site”.
- 3.5.3. Guidance on the Habitats Directive sets out four distinct stages for assessment under the Directive:
- Stage 1: Screening: the process which initially identifies the likely impacts upon a Natura 2000 site of a plan or project, either alone or in combination with other plans or projects, and considers whether these impacts are likely to be significant (undertaken at Regulation 18);
 - Stage 2: Appropriate Assessment: the detailed consideration of the impact on the integrity of the Natura 2000 sites of the plan or project, either alone or in combination with other plans or projects, with respect to the site’s conservation objectives and its structure and function. This is to determine whether there will be adverse effects on the integrity of the site (undertaken at this stage - Regulation 19);
 - Stage 3: Assessment of alternative solutions: the process which examines alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the Natura 2000 site ; and
 - Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain: an assessment of whether the development is necessary for imperative reasons of overriding public interest (IROPI) and, if so, of the compensatory measures needed to maintain the overall coherence of the Natura 2000 network.
- 3.5.4. The first stage of the HRA (screening) was undertaken alongside the IIA Interim Report, to support Regulation 18 consultation. As the screening was unable to rule out LSE, Stage 2 (Appropriate Assessment) has been undertaken to support Regulation 19. This IIA Report outlines the key findings from this assessment.
- 3.5.5. The HRA is driven by separate legislation to the SEA/SA and other forms of assessment. This means the HRA Report will be published separately to the IIA Report and not included as an appendix to the IIA Report.

3.6 IIA Process and Requirements

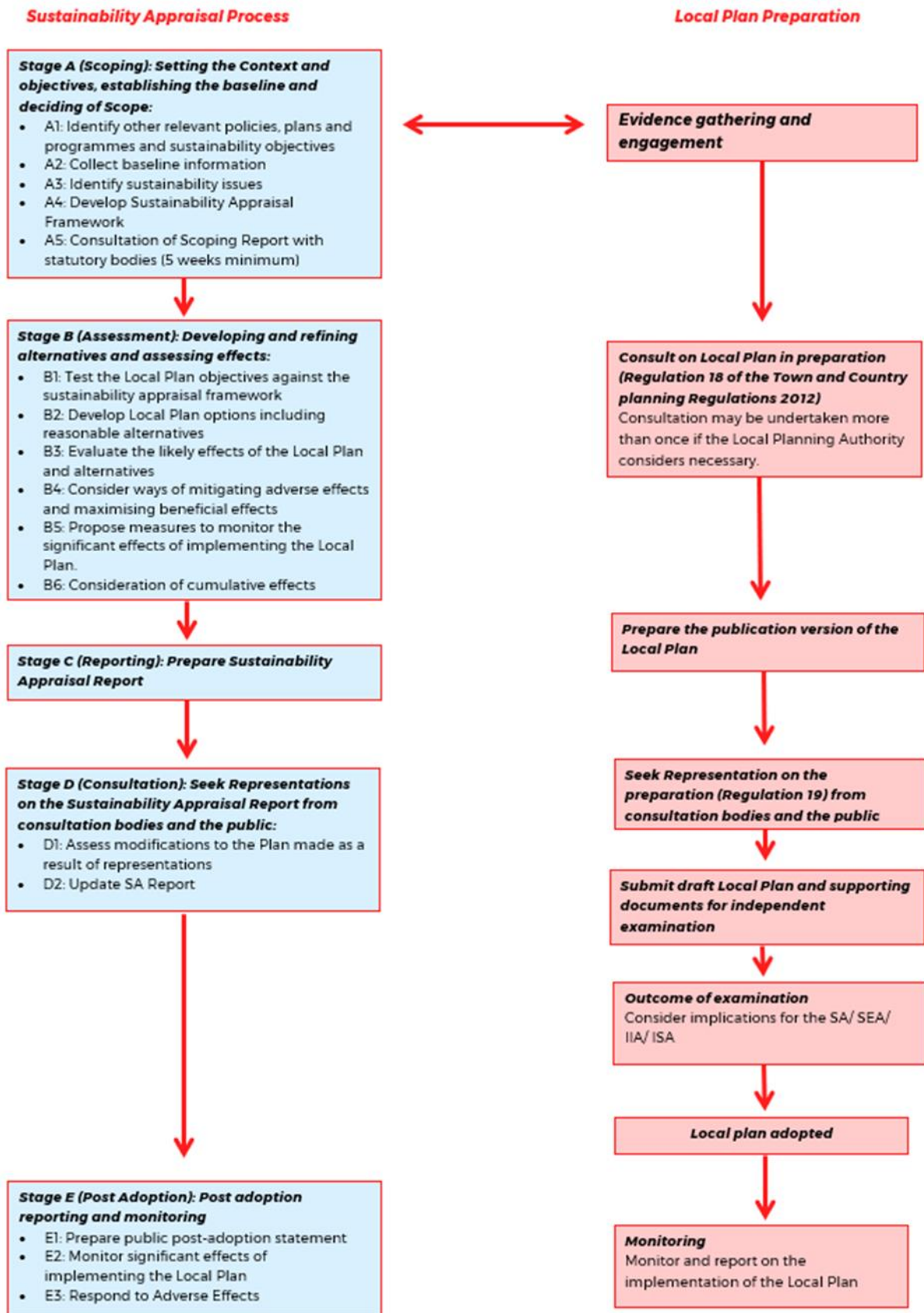
- 3.6.1. **Table 3-1** below sets out the IIA process. The integration of the IIA with the Local Plan process is shown in **Figure 3-1**. This Report represents Stage 2 of the Local Plan and IIA Stage B. **Appendix A** sets out more specifically how the IIA has met the requirements of the SEA Regulations.

Table 3-1 – IIA Stages

Local Plan Stage	IIA Stage and Tasks
<p>Stage 1: Evidence Gathering and Engagement</p>	<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope – Completed in 2023</p> <p>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives</p> <p>A2: Collecting baseline information</p> <p>A3: Identifying sustainability issues and problems</p> <p>A4: Developing the IIA assessment framework</p> <p>A5: Consulting on the scope of the IIA</p>
<p>Stage 2: Draft Plan Preparation and Regulation 18 Consultation</p>	<p>Stage B: Developing and refining options/alternatives and assessing effects</p> <p>B1: Testing the draft plan objectives against the IIA assessment framework</p> <p>B2: Developing the draft Local Plan options and preparing an IIA Report (this report)</p> <p>B3: Predicting the effects of the draft Local Plan and its alternatives</p> <p>B4: Evaluating the effects of the draft Local Plan and its alternatives</p> <p>B5: HIA and EqlA assessments</p> <p>B6: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>B7: Proposing measures to monitor significant effects of implementing local plans</p> <p>B8: Consultation of Interim IIA Report to accompany the Regulation 18 consultation</p>
<p>Stage 3: Preparation of the publication version of the Plan</p>	<p>Stage C: Prepare the Integrated Sustainability Appraisal Report – This Report</p> <p>C1: Testing the final objectives against the IIA framework</p> <p>C2: Predicting the effects of the final Local Plan and its alternatives</p> <p>C4: Evaluating the effects of the final Local Plan and its alternatives</p> <p>C5: Updated HIA and EqlA assessments</p> <p>C6: Development of mitigation and enhancement measures</p> <p>C7: Further development of monitoring measures</p> <p>C8: Consultation of IIA Report to accompany the Regulation 19 consultation</p>

Local Plan Stage	IIA Stage and Tasks
<p>Stage 4: Seek representation on the publication Plan (Regulation 19) from consultation bodies and the public</p>	<p><i>Stage D: Consulting on the preferred options of the Local Plan and IIA Report – This stage</i></p> <p>D1: Public participation on the preferred options of the Local Plan and the IIA Report</p> <p>D2 (i): Appraising any significant changes from consultation</p>
<p>Stage 5: Independent Examination</p>	<p><i>Stage D: Consulting on the preferred options of the Local Plan and IIA Report</i></p> <p>D2 (ii): Appraising any significant changes from representations</p> <p>D3: Preparation of an IIA Statement</p>
<p>Stage 6: Adoption and monitoring</p>	<p><i>Stage E: Monitoring the significant effects of implementing the Local Plan</i></p> <p>E1: Finalising aims and methods for monitoring</p> <p>E2: Responding to adverse effects</p>

Figure 3-2 - Local Planning Process Vs SA Process



3.7 IIA Report Methodology

- 3.7.1. Stage C (this report) comprises the assessment of the preferred Local Plan, against the IIA Appraisal Framework objectives identified within the Scoping Report. This follows on from the previous assessment undertaken at for the Regulation 18 Interim IIA Report.
- 3.7.2. As per the SEA regulations, the IIA also needs to consider and compare all reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the borough. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan.
- 3.7.3. There are not currently any alternative policies, therefore, the IIA has continued to assess two different scenarios – the continuation of the existing Local Plan and the application of the London Plan¹⁶. There are proposed alternative sites, which have been assessed alongside the proposed allocations.
- 3.7.4. This IIA Report will therefore cover the assessment of:
- Compatibility assessment of the Visions and Strategic Objectives;
 - Local Plan preferred policies;
 - Alternative policy scenarios;
 - Site allocations; and
 - Site alternatives.

Compatibility Assessment

- 3.7.5. Testing the compatibility of the preferred Local Plan's Strategic Policies and Objectives against the IIA Appraisal Framework help to identify both potential synergies and inconsistencies. This information can help in developing and refining the objectives of the Local Plan.

See **Section 5** for further details.

Assessment of Effects

- 3.7.6. The assessment of policies, sites and alternatives has considered the following:
- Overall effect significance (negative, positive, uncertain, potential for both negative and positive effect or negligible)
 - Nature of effect (direct, indirect)
 - Spatial Extent (local, regional, national)

¹⁶ Mayor of London, The London Plan, 2021 [online] available at:
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

- Reversibility of effect:
 - Reversible: The receptor can return to baseline condition without significant intervention
 - Irreversible: The receptor would require significant intervention to return to baseline condition
- Duration (short, medium or long term) – Short term: 0-5 years, Medium term: 5-10 years (up to the end of the plan period) Long term: 10+ years (beyond the plan period).

3.7.7. **Table 3-2** sets out the key to the assessment, whilst the detailed Assessment criteria is set out in **Appendix B**.

Table 3-2 – Key to Assessment

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local – borough wide / regional – Greater London / national - England)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

- 3.7.8. It should be noted that where uncertain and negligible effects have been identified, it has not been possible to determine the nature of effect, the spatial extent, the reversibility or the duration of effect. In this instance, these cells have been left blank.

Assessment of Policies

- 3.7.9. The assessment of policies has been undertaken by themes which have been assessed together. The assessment of policies within themes and sub-themes have been standalone assessments, which purely assess the outcome of the application of those policies rather than the draft Local Plan as a whole.

Policy Alternatives

- 3.7.10. The assessment of policy alternatives will assess two scenarios – the continuation of the existing Local Plan and the application of just the London Plan. The assessment would not assess individual policies within these documents but will look at the application as a whole.
- 3.7.11. A high level summary of effects on each of the IIA objectives will be provided and each will be scored using the Key to Assessment set out in **Table 3-2** above. See **Section 6** for further details.

Assessment of Sites

- 3.7.12. An initial red, amber, green (RAG) assessment for both the site allocations and alternative sites was undertaken using spatial indicators for each of the IIA Appraisal Framework objectives.
- 3.7.13. Relevant data on spatial environmental, social and economic indicators, as well as those specifically relevant to health and equalities, have been loaded onto an online WebGIS platform, which has facilitated the site assessments.
- 3.7.14. Spatial calculations were undertaken following the RAG criteria (as set out in **Appendix B**). This has allowed a quick build-up of a RAG assessment of sites and build an overview matrix of the assessment and the performance against the spatial indicators.
- 3.7.15. It should be noted that the RAG assessment simply highlights the potential sensitivity of different indicators, it doesn't necessarily mean that the indicators are good or bad. For instance, an area of overall deprivation could be more highly sensitive to change so scored red (R), however, development of the site could in turn reduce levels of deprivation.
- 3.7.16. Due to this professional expertise has been used to review and validate this initial RAG rating to provide the final assessment of each site.
- 3.7.17. This RAG assessment provided a good overview of key environmental, social and economic constraints at each of the sites, allowing for a more thorough assessment. This assessment has been used as a key starting point for assessing the effects of sites against the IIA framework objectives.

Cumulative Effects

- 3.7.18. The SEA Regulations require that cumulative effects are considered when identifying likely significant effects. Therefore, a number of plans and policies (local, regional and national) have been reviewed for potential cumulative effects in addition to potential cumulative effects that could occur alongside the implementation of the draft Local Plan.
- 3.7.19. In addition, the assessment of sites has considered the cumulative effects of neighbouring development sites, including those beyond the borough boundary.
- 3.7.20. The assessment of cumulative effects has been identified in **Section 9** of this report.

Mitigation, Enhancement Measures and Monitoring

- 3.7.21. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment as a result of implementing the plan. The measures are known as 'mitigation' measures.
- 3.7.22. Mitigation measures have been identified in relation to the assessment of policies, place visions, site allocations and site alternatives. These include both proactive avoidance of adverse effects and actions taken after potential effects have been identified. These are set out in **Section 10** of this report.
- 3.7.23. **Section 10** also includes enhancement measures, which aim to optimise positive impacts and enhance sustainability. The mechanism for delivery will ensure the promotion, prevention, reduction and offset of any significant adverse effects or enhancement opportunities on the environment.
- 3.7.24. The SEA Regulations also require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.

3.8 Assumptions and Limitations

- 3.8.1. The preparation of the Local Plan alongside the IIA has allowed an iterative process of assessment and refinement in the narrative and policies within the Plan. Therefore, some of the recommendations set out in this report may already have been addressed in the Local Plan.
- 3.8.2. The assessment of policies, policy alternatives, sites and alternative sites, has been undertaken as a desk-based exercise using the baseline information from the Scoping Report. No site visits have been undertaken specifically for the purposes of the IIA.
- 3.8.3. WSP have ensured that effects are predicted accurately; however, this can be challenging given limited understanding of precisely how the plan will be implemented. Given

uncertainties there is inevitably a need to make some assumptions, however, these are made carefully and explained in detail within the assessment text.

- 3.8.4. In some instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on the potential positive and negative effects of the draft plan and its alternatives in more general terms.

4 Identification of Sustainability Issues and Opportunities and the IIA Framework

4.1 Introduction

- 4.1.1. This section sets out the sustainability issues and opportunities for the Local Plan and the IIA Appraisal Framework, against which the Local Plan has been assessed.
- 4.1.2. A Scoping Report, in support of the emerging Local Plan, was produced by WSP in 2023, which initiated the SEA process (see **Table 3-1**). This report reviewed relevant legislation, plans, and programmes baseline, identified baseline information as well as key issues and opportunities for the Local Plan and identified an assessment framework.
- 4.1.3. This report was consulted on with the Statutory Consultees (Environment Agency, Historic England and Natural England) in July 2023 and details on their consultation comments can be found in **Appendix B**. It should be noted that the Environment Agency have received the IIA Scoping Report but are yet to comment.

The baseline information used within the IIA Scoping Report is set out in **Appendix C**.

4.2 Review of Plans Policies and Programmes

- 4.2.1. A plan may be influenced in various ways by other plans, policies or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. These relationships enable the Responsible Authority to take advantage of potential synergies and to deal with any inconsistencies and constraints.
- 4.2.2. The Scoping Report undertook an initial review of policies, plans, programmes, strategies and initiatives that may have an impact on the preparation of relevant policies being reviewed as part of the Local Plan update. This review has informed both the development of the Local Plan and the IIA framework.
- 4.2.3. Full details on the review of plans, policies and programmes is set out in **Appendix D**.

4.3 Sustainability Issues and Opportunities

- 4.3.1. The Scoping Report set out a number of issues and opportunities for the Local Plan, for each of the IIA topics outlined in the Scoping Report. These have been summarised in **Table 4-1** below.

Table 4-1 – Issues and Opportunities

Topic	Issues and Opportunities
Population and Equalities	<ul style="list-style-type: none"> ■ There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income. ■ There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities. ■ The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile. ■ Changing work habits such as remote, internet-based jobs are likely to reduce current demands but may also increase social isolation and reliance on alternative social interaction.
Human Health	<ul style="list-style-type: none"> ■ LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness, smoking, and Sexually Transmitted Infection (STI) treatment. ■ There are significant health inequalities amongst residents in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents. ■ Covid-19 has also exacerbated existing inequalities in the borough. ■ There are high levels of obesity within children aged 10-11 years.
Economy and Employment	<ul style="list-style-type: none"> ■ LBTH is a major location for employment in London, attracting a large daytime population of employees. ■ Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount are employed. Employed residents in LBTH have a higher gross value added (GVA) per head and gross weekly pay. ■ However, there is a higher economic activity rate, with more males economically active than females. ■ This also highlights that there may be a need to diversify employment within the borough, particularly to match the skills of existing residents. ■ In the recovery of Covid-19 it is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough. ■ Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping.
Housing	<ul style="list-style-type: none"> ■ The average house price is over ten times higher than the average salary in the borough.

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> ■ The population is increasing and becoming younger, with more residents requiring affordable housing. ■ Rising costs of living are affecting the number of residents able to afford to buy. ■ The Covid-19 pandemic and rising cost of living is increasing levels of homelessness and housing insecurity. ■ There is a lack of affordable housing, meaning young people and/or lower income groups are missing out.
Crime and Safety	<ul style="list-style-type: none"> ■ There is potential to increase engagement within communities to encourage the reporting of crimes. ■ Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour. ■ There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours. ■ As the population within LBTH increases there are expected to be a greater number of vehicles on the borough’s roads, which may result in an increase in the number of accidents and those Killed or Seriously Injured (KSI) on roads. ■ Children in the most deprived neighbourhoods are nearly three times more likely to be KSI as a pedestrian compared to non-deprived neighbourhoods. ■ There are opportunities to increase the safety of active transport modes such as cycling and walking. ■ Vulnerable road users such as cyclists and pedestrians are more likely to be casualties. ■ There is potential to increase the standards and safety of housing within the borough.
Transport and Accessibility	<ul style="list-style-type: none"> ■ There is a need to improve sustainable transport modes (public and active) in line with THBC’s commitment to reach net-zero GHG emissions by 2045. ■ Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs. ■ Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender. ■ Changing work habits such as remote, internet-based jobs and working from home are likely to reduce transport demand. ■ Health inequalities are prevalent in the borough, therefore reducing significant issues with traffic and congestion and subsequent air pollution is of utmost importance.

Topic	Issues and Opportunities
Biodiversity and Natural Capital	<ul style="list-style-type: none"> ■ Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas, notably the European designations. ■ Increasing population and associated developments may lead to fragmentation and urbanisation of natural habitats. ■ Increasing population and developments may result in worsening air quality that may degrade the borough’s valuable ecological receptors. ■ New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity. ■ The inclusion of Blue Green Infrastructure (BGI) can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island (UHI) effects and help to make developments more climate resilient, especially when it comes to flood mitigation.
Landscape and Townscape	<ul style="list-style-type: none"> ■ Development has the potential to cause direct and indirect impacts on designated landscapes and townscapes, affecting the character and sense of place. ■ Future growth could risk compromising landscape and townscape character and features. However, a landscape-led design with GI principles in place could play a key role in the enhancement of the natural environment, visual amenity, and physical and mental health of the borough’s people. ■ The design of new developments requires a landscape-led approach to design, to ensure the best placement and integration of the proposed development into the existing landscape, especially in sensitive locations. Landscape-led designs can help contribute to the climate change agenda, health and wellbeing, and tackling pollution in all its forms (such as air, light and noise). ■ There is opportunity to increase access to green space and subsequently, to improve health and wellbeing, combat air pollution, provide storm water management and reduce flooding (contributing to climate change adaptation and mitigation) and provide connectivity through urban built form to the countryside for wildlife. It can also bring new audiences to tourist attractions and enable better appreciation of historic landscape assets through creating new views and vistas, providing information, and enhancing access. ■ The incorporation of landscape principles that are suitable for future challenges and landscape-led designs would help to ensure infrastructure is designed for longevity in the 21st century, for both its people and its natural environment.
Historic Environment	<ul style="list-style-type: none"> ■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active modes and asset settings.

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> ■ Trans-boundary matters should be noted and the impact that development in LBTH may have on heritage in other boroughs. ■ There is potential for development to encroach on assets, particularly affecting the setting of assets, for example through land take, and increased noise and visual effects. Although damage to the significance and setting of assets from development is not limited to these factors; Archaeological remains, whether designated or not, normally require preservation <i>in situ</i>. This clearly has implications and can represent a significant constraint to future scheme design, which should respect, retain and protect the remains (e.g., through avoidance and redesign). ■ Vehicle damage and pollution can adversely affect World Heritage Site's, listed buildings and scheduled monuments, so reducing vehicle movements within historic areas is also important to address. ■ The New Local Plan should ensure that the local historic environment (including the archaeological resource) informs design proposals, public realm and landscaping schemes to help ensure that heritage assets and their settings are enhanced. ■ There is potential for physical interventions to historic buildings intended to improve energy efficiency to adversely affect heritage significance if not carefully thought through and appropriate to the building in question
Water Environment	<ul style="list-style-type: none"> ■ The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat. ■ Upgrading existing infrastructure provides the opportunity to improve pollution control. ■ Increased development (including transport, housing and other infrastructure) can increase flood risk on a local and catchment scale. ■ Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the already stressed capacity of sewer systems. ■ Climate change is likely to increase the occurrence of flooding from all sources and hence raise the flood risk in LBTH.
Air Quality	<ul style="list-style-type: none"> ■ The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation. ■ More severe and frequent heat episodes as a result of climate change can contribute to the worsening of air quality. ■ Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases.

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> ■ The UK Government’s plan to end the sale of all new conventional petrol and diesel cars and vans by 2035 and support for work and home-based electric charging facilities, will promote use of hybrid and electric vehicles, with positive effects for air quality. ■ Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality.
Climate Change and Greenhouse Gases	<ul style="list-style-type: none"> ■ Transport is the largest contributor to Greenhouse Gas (GHG) emissions in the UK. In LBTH, the largest contributor is from commercial uses. ■ Higher than average fuel poverty rates may continue to be a significant issue in the borough. ■ Since the Covid-19 pandemic, private car use has increased which contributes to GHG emissions. ■ The impacts of the Urban Heat Island (UHI) generated in London will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households. ■ There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH. ■ There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit.
Material Assets (including Soil Resources)	<ul style="list-style-type: none"> ■ The growing population and associated need for development is likely to increase the use of mineral resources and waste generation. This is highly important considering the Belvedere Energy from Waste (EfW) facility processes waste from across London. ■ Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population. ■ There is a continued increase in renewable energy supplies across the borough, of which needs to be managed efficiently to ensure the capacity requirements of this transition are met.

4.4 IIA Appraisal Framework

- 4.4.1. The review of relevant plans, policies and programmes, collation of baseline information and identification of issues and opportunities, has been used to inform the IIA Appraisal Framework, which is set out in **Table 4-2** overleaf.
- 4.4.2. This table also sets out the spatial indicators used to assess each of the objectives as part of the site assessments.

Table 4-2 – IIA Appraisal Framework

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
<p>Population and Equalities</p>	<p>IIA1: To build inclusive communities by reducing social exclusion, promoting equity, and equality and respecting diversity.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Help to reduce inequalities, particularly for those people and communities most vulnerable? ■ Improve access to services, facilities and transport for all inclusively? ■ Support diversity? ■ Support population growth? 	<ul style="list-style-type: none"> ■ Population density ■ Indices of Multiple Deprivation (IMD) Overall Deprivation ■ Primary Schools ■ Secondary Schools ■ Higher Education ■ Healthcare Provision (GP, dentists, pharmacies and hospitals) ■ Children and Family Centres ■ Community Centres ■ Leisure Services ■ Social Services
<p>Human Health</p>	<p>IIA2: To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH’s residents.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Promote healthier lifestyles? ■ Increase walking and cycling? ■ Improve quality, quantity and equality of access to green and blue space and increase opportunities for recreation? ■ Promote health enhancing environments, behaviours and activities for local communities? ■ Reduce inequalities? ■ Increase inclusion and reduce loneliness? 	<ul style="list-style-type: none"> ■ IMD Health Deprivation ■ Life expectancy (males and females) ■ Primary Schools ■ Secondary Schools ■ Higher Education ■ Healthcare Provision (GP, dentists, pharmacies and hospitals) ■ Children and Family Centres ■ Community Centres ■ Allotments ■ Leisure Services ■ Social Services

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<ul style="list-style-type: none"> ■ Help prevent risks to human health, which arise from noise and air pollution? ■ Support the UK’s levelling up agenda? ■ Reduce the pressure of the rising cost of living? ■ Increase exposure to noise and air pollution? 	<ul style="list-style-type: none"> ■ Sports Facilities ■ Areas Deficient in Nature
<p>Economy and Employment</p>	<p>IIA3: To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets’ town centre and other district and local centres.</p> <p>IIA4: To ensure that residents have employment opportunities and access to training.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Increase job availability? ■ Improve access to employment centres? ■ Improved connectivity between business clusters and housing markets? ■ Support flexible working patterns? ■ Help support changing retail patterns? ■ Increase retail floorspace? ■ Increase footfall and local spending from commuters, residents and tourists? ■ Meet the skills needs and future demand for labour? ■ Diversify the labour market? 	<ul style="list-style-type: none"> ■ IMD Employment ■ IMD Income ■ Local Industrial Location ■ Strategic Industrial locations ■ Employment sites ■ Local Employment Location ■ Higher Education ■ Central Activities Zone ■ Tower Hamlets Activity Zone ■ Primary Shopping Areas ■ Neighbourhood Parades ■ Primary Shopping Areas ■ Town Centres (major, district and neighbourhood)

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
Housing	IIA5: To meet the housing needs of all of the borough's residents inclusively.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Help to sufficiently meet the borough's housing target? ■ Increase affordability? ■ Optimise proposed sites to maximise housing delivery? ■ Reduce housing deprivation? ■ Meet the needs of all groups inclusively (elderly residents, young families, disabled, ethnic minorities etc.)? ■ Support those with protected characteristics (e.g., the gypsy and traveller community) ■ Increase the quality of existing housing stock? ■ Reduce overcrowding? 	<ul style="list-style-type: none"> ■ IMD Barriers to housing (LSOA) ■ House Prices (wards)
Crime and Safety	IIA6: To reduce crime and the fear of crime for all residents inclusively	Will the policy or proposal: <ul style="list-style-type: none"> ■ Improve safety? ■ Ensure that residents feel safe, particularly after dark? ■ Support designing out crime principals? ■ Reduce levels of crime derivation? ■ Improve road safety and reduce the number of people KSI on the roads, 	<ul style="list-style-type: none"> ■ IMD Crime ■ Crime Rate by ward

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		particularly children from deprived backgrounds? ■ Create spaces where women and girls feel safe and included?	
Transport and Accessibility	IIA7: To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally. IIA8: To protect and enhance access to essential services and facilities for all residents.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Support the use of sustainable transport modes? ■ Improve access to services, facilities and transport? ■ Reduce demand for use of the private car and facilitate a modal shift to more sustainable modes? ■ Ensure that all groups can access services and facilities inclusively? ■ Support EV infrastructure? 	<ul style="list-style-type: none"> ■ Public Transport Accessibility Levels (PTAL) ■ Bus Stops ■ National Rail Train Station/ Tube Station ■ Primary Schools ■ Secondary Schools ■ Higher Education ■ Healthcare Provision ■ Children and Family Centres ■ Community Centres ■ Leisure Services ■ Social Services ■ Sports Facilities ■ Primary Shopping Areas ■ Neighbourhood Parades ■ Primary Shopping Areas ■ Town Centres (major, district and neighbourhood)
Biodiversity and Natural Capital	IIA9: To protect and enhance protected habitats, species and valuable ecological networks that contribute to	Will the policy or proposal: <ul style="list-style-type: none"> ■ Cause damage to locally and nationally designated sites through infrastructure provision, increased 	<ul style="list-style-type: none"> ■ Local Nature Reserve (LNR) ■ National Nature Reserve (NNR) ■ Priority Habitat ■ Site of Importance for Nature Conservations (SINC)

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
	ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.	development, recreational pressures, traffic or maintenance? <ul style="list-style-type: none"> ■ Maintain and enhance biodiversity in the borough? ■ Seek opportunities for biodiversity for at least 10% net gain? ■ Increase provision of ecosystem services from the borough’s natural capital? ■ Prevent fragmentation of habitats and promote ecological networks? ■ Result in developments which will improve biodiversity on site? ■ Fragment habitat connectivity and reduce the ability for biodiversity to thrive? 	<ul style="list-style-type: none"> ■ SAC ■ Site of Special Scientific Interest (SSSI) ■ SPA ■ Green Grid Network
Landscape and Townscape	IIA10: To protect and enhance the borough’s townscapes and landscapes.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Respect, maintain and strengthen local character and distinctiveness? ■ Achieve high quality sustainable design for buildings, spaces and the public realm? ■ Improve the quality and condition of the townscape and landscape? ■ Improve the quality of parks and open spaces? ■ Incorporate green and blue infrastructure into design? 	<ul style="list-style-type: none"> ■ Borough Designated Views ■ London View Management Framework ■ Tall Building Zone ■ Strategically Important Skyline ■ London Squares ■ Local Open Space ■ Metropolitan Open Land ■ Green Grid Network

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
Historic Environment	IIA11: To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Conserve and/or enhance heritage assets, their setting and the wider historic environment? ■ Contribute to the better management of heritage assets and contribute to conserving heritage at risk? ■ Improve the quality and condition of the historic environment? ■ Respect, maintain and strengthen local character and distinctiveness? 	<ul style="list-style-type: none"> ■ Listed Buildings ■ Registered Parks and Gardens ■ Scheduled Monuments ■ Heritage at risk ■ Conservation areas ■ Archaeological Priority Area
Water Environment	IIA12: To reduce the risk and vulnerability to flooding. IIA13: To maintain and enhance water quality.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Reduce the risk of flooding? ■ Result in urban creep? ■ Increase surface runoff? ■ Result in the reduction of water quality (including groundwater)? ■ Support the protection and enhancement of water bodies (including groundwater)? ■ Encroach on the 10m buffer zone next to a watercourse? ■ Alter the natural state of the river corridor? ■ Re-naturalise the river corridor and promote geomorphological 	<ul style="list-style-type: none"> ■ Statutory Main River ■ Water Spaces ■ Flood Zones (2, 3, 3a) ■ Flood Risk Area ■ Critical drainage area

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<p>processes which enhance and protect biodiversity?</p> <ul style="list-style-type: none"> ■ Support a natural form of flood management which also promotes biodiversity of the watercourse? 	
<p>Air Quality</p>	<p>IIA14: To protect and enhance air quality.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Support measures to reduce levels of air pollution? ■ Help to improve air quality? ■ Support measures for the reduction of congestion and traffic levels particularly in AQMAs and congestion hot-spots? 	<ul style="list-style-type: none"> ■ Nitrogen dioxide (NO2) ■ Particulate Matter (PM10) ■ Motor Vehicle restricted area ■ Air Quality Focus Areas ■ Ultra Low Emission Zone (ULEZ)
<p>Climate Change and Greenhouse Gases</p>	<p>IIA15: Ensure that Tower Hamlets is resilient to the effects of climate change.</p> <p>IIA16: To reduce GHG emissions, support national and local decarbonisation initiatives and encourage energy efficiency.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Support low carbon and energy efficient design? ■ Contribute further to the urban heat island effect? ■ Ensure new development is designed to mitigate overheating risk? ■ Increase the resilience of infrastructure and material assets to the impacts of climate change (including flood risk, extreme weather, heat and cold)? 	<ul style="list-style-type: none"> ■ Overall Climate Risk ■ Overall Heat Risk ■ Flood Zone ■ Flood Risk Area ■ NO₂ ■ PM₁₀ ■ Motor Vehicle restricted area ■ ULEZ

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<ul style="list-style-type: none"> ■ Contribute to reducing emissions as per the Paris Agreement? ■ Support the borough's Net Zero ambitions by 2045? 	
Material Assets (including Soil Resources)	<p>IIA17: To reduce the amount of waste produced and minimise the amount sent to landfill.</p> <p>IIA18: To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Support the use of brownfield land? ■ Support the use of sustainable materials? ■ Minimise the amount of waste? ■ Increase renewable energy generation? ■ Support low carbon, energy efficient design? ■ Reduce levels of embodied carbon? 	<ul style="list-style-type: none"> ■ Brownfield Land ■ Waste management sites ■ Safeguarded Wharves

5 Compatibility Assessment of Strategic Policies and Objectives

5.1 Introduction

- 5.1.1. This section assesses the compatibility of the Objectives and Strategic Policies against the IIA Appraisal Framework objectives.
- 5.1.2. The Strategic Policies and Objectives have been individually tested against the IIA Appraisal Framework objectives to identify both potential synergies and inconsistencies. This information can help in developing and refining the objectives of the Local Plan.
- 5.1.3. **Table 5-1** below sets out the key to appraisal, whilst **Table 5-2** overleaf sets out the findings of the compatibility testing of the Strategic Policies and the Strategic Objectives.

Table 5-1 – Key to Compatibility Assessment

Effect	Key
Compatible	✓
Incompatible/ potential conflict	✗
No relationship	0
Uncertain/ more than one potential outcome	?

Table 5-2 – Compatibility Assessment

	IIA1: Population and Equalities	IIA2: Human Health	IIA3: Economy	IIA4: Employment	IIA5: Housing	IIA6: Crime and Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity and Natural Capital	IIA10: Landscape and Townscape	IIA11: Historic Environment	IIA12: Flood Risk	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change	IIA16: Greenhouse Gases	IIA17: Waste	IIA18: Efficient use of Resources
Vision	✓	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	?	?	✓	?	✓	?	?
Objective 1: Empowering our communities culturally, economically, and politically	✓	✓	✓	✓	0	0	0	0	0	✓	✓	0	0	0	0	0	0	0
Objective 2: Tackling overcrowding and housing in our borough	✓	✓	0	0	✓	0	0	✓	?	?	?	?	0	0	0	?	?	✓
Objective 3: Supporting young people and accelerating education	✓	✓	✓	✓	0	✓	0	✓	✓	✓	0	0	0	0	0	0	0	0
Objective 4: A thriving local and global economy that boosts jobs, skills, businesses and tackles inequalities	✓	✓	✓	✓	0	0	✓	✓	0	0	0	0	0	0	0	0	0	0
Objective 5: Securing infrastructure delivery to protect and strengthen public services	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	0	0	0	?	?	0
Objective 6: A clean and green future	✓	✓	0	0	0	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓
Objective 7: Healthy, safe and inclusive neighbourhoods	✓	✓	✓	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0

5.2 Compatibility Assessment Summary

- 5.2.1. In general, the Vision and Objectives have performed well against the majority of the IIA objectives and clearly demonstrate their compatibility. Whilst the assessment has not identified any incompatible effects, some uncertainties have been identified.
- 5.2.2. On the whole, the Vision and supporting Objectives have predominantly resulted in a positive effect as it covers the three key pillars of sustainability (economy, social and environment) and aims to tackle key issues such as climate change, net zero, biodiversity loss, inequalities, overcrowding and affordable housing, which aligns with the aims and aspirations of the IIA objectives.
- 5.2.3. Due to the cross-cutting nature of the 'clean and green future' objective (Objective 6), this is the most compatible across all objectives. LBTH aim to reduce their dependence on cars and improve both the natural and built environment to make walking and cycling attractive for local journeys, providing greater accessibility. This will allow residents to live their lives more locally, creating more inclusive neighbourhoods, having positive effects on population and equalities (IIA1) and human health (IIA2). Reducing the need to travel will also result in positive outcomes for IIA7 (sustainable transport) and IIA8 (accessibility).
- 5.2.4. Objective 6 also aims to improve air quality (IIA14), set high energy standards and support zero carbon developments (IIA16 and IIA18). Further support is also provided to ensuring climate resilience through greater mitigation for flood risk both now and in the future.
- 5.2.5. The Vision and Objectives 2 and 5 have identified the potential for uncertain effects on a number of IIA objectives. This is due to the potential for these policies to result in large scale development and infrastructure to support the borough's communities. These sites are likely to require land take, which may negatively affect biodiversity and natural capital (IIA9) and depending upon the location, the surrounding landscape and townscape (IIA10) and historic environment (IIA11). Similarly, the increase in development may increase levels of embodied carbon and operational GHG (IIA16), generate large amounts of waste (IIA17) and may contribute to increases levels of flood risk (IIA12).
- 5.2.6. However, as this is a high-level Vision and overarching objectives, there is no certainty to how such development might arise, and there may be potential for developments to bring about positive effects on these objectives.
- 5.2.7. Waste (IIA17) is the only IIA objective which does not have any compatibility with either the vision or any objectives. Neither the vision or objectives make reference to minimising waste or encourage the use of sustainable materials.

6 Assessment of Policies

6.1 Introduction

- 6.1.1. The assessment of the Local Plan policies is summarised below and presented in full in **Appendix F**. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 6-1** below. It should be noted that the Policy themes have been assessed as a whole against each of the IIA objectives, rather than each individual policy.
- 6.1.2. Each of the policy themes have been assessed in isolation, without mitigation. The assessment purely assesses the outcome of the application of those policies rather than their relationship with other policies within the plan. Further details on the combination effects with other policies have been identified in within the individual assessment summaries in **Appendix F** as well as **Section 9 – Cumulative Effects**.
- 6.1.3. **Table 6-2** overleaf provides an overview on the performance of the Local Plan policy themes against each IIA objective and **Table 6-3** outlines significant effects based on each IIA objective. For the purpose of the IIA, significant effects are deemed to be the following:
- Significant Positive effects;
 - Significant Negative effects; and
 - Uncertain effects.
- 6.1.4. Further details on the insignificant effects i.e., minor positive, minor negative, mixed and neutral effects are detailed in **Appendix F**. The Appendix also sets out the nature of effects such as magnitude, spatial extent and duration.

Table 6-1 – Significance of Effect

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-

Effect Significance	Key
Negligible / No effect	0

6.2 Summary of Effects

Table 6-2 provides an overview on the performance of the Local policy themes against each IIA objective and Table 6-3 outlines significant effects based on each IIA objective.

Table 6-2 – Overview of Policies

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA1: Population & Equalities	++	++	+	++	+	++	++	++	++	0
IIA2: Human Health	++	++	++	++	+	+	++	++	++	+
IIA3: Economy & Town Centres	++	++	0	+	++	++	++	0	+	0
IIA4: Employment & Skills	++	+	+	0	++	++	++	0	0	+
IIA5: Housing	+	++	+	+	-	0	0	0	0	+

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA6: Crime & Safety	+	+	0	++	0	+/-	+	+	++	+
IIA7: Sustainable Transport	+	+	+	+	++	+	+	+	?	+
IIA8: Accessibility	++	+	0	++	+	+	++	+	++	0
IIA9: Biodiversity & Natural Capital	+	+/-	++	+	?	0	?	++	?	?
IIA10: Landscape & Townscape	+	+/-	+	+	+/-	+	?	++	+/-	?
IIA11: Historic Environment	+	?	+	++	+/-	?	?	+	+/-	?
IIA12: Flooding	++	?	++	+	?	0	0	++	0	0

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA13: Water Quality	+	0	++	+	0	0	0	++	?	?
IIA14: Air Quality	+	+/-	++	+	+/-	+	+	+	?	+/-
IIA15: Climate Change & Resilience	+	+	++	+	0	0	0	++	0	0
IIA16: GHG Emissions	+	?	++	+	?	0	?	+	+/-	+/-
IIA17: Waste	+	?	++	+	?	0	?	0	?	++
IIA18: Efficient use of Land and Resources	0	+/-	++	+	+	+	+	+/-	?	0

Table 6-3 – Summary of Significant Effects

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA1: Population & Equalities	7	0	0	<p>Out of all of the IIA Objectives, IIA1 has resulted in the highest number of significant positive effects. These effects are generally attributed to the support provided to the needs of all of the borough’s residents inclusively, both now and in the future. Both the Town Centre and Community Infrastructure policies will increase community facilities.</p> <p>More specifically, Policy PS4 within People, Places and Spaces theme will ensure that all genders are able to access community spaces equally. Additionally, both MC1 and MC2 (within the Movement and Connectivity theme) provide improved accessibility to all social groups, including disabled, elderly, women and girls and other marginalised groups.</p>
IIA2: Human Health	7	0	0	<p>Seven out of the ten policy themes have resulted in significant positive effects on IIA2. Most of these effects have been identified for those policies which aim to provide more community infrastructure and green spaces, enable greater levels of physical activity and improve standards of living. Not only will policies improve physical health but also mental wellbeing.</p> <p>More specifically, Policy PS3 (within the People, Places and Spaces theme), Policy BO2 (within the Biodiversity and Open Space theme), and Policies G2, CG3 and CG4 (within Clean and Green Future) tackle adverse effects that environmental factors such as overheating, wind, air pollution, light pollution noise pollution, and odours which can have harmful effects on human health.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA3: Economy & Town Centres	5	0	0	<p>The Town Centre Policies have had significant positive effects on IIA3 as they contribute to increasing footfall and improving the diversity of the economy within Tower Hamlets, encouraging economic growth through a range of sectors across the borough. Similarly, the Policies within the Inclusive Economy and Good Growth theme have resulted in significant positive effects through creating jobs, employment spaces and attracting inward investment into the borough.</p> <p>Further indirect significant positive effects have been derived from the Homes for the Community, Delivering the Local Plan and Community Infrastructure policy themes, as these will likely bring new facilities and services to support the local population and increase economic output and productivity.</p>
IIA4: Employment & Skills	4	0	0	<p>Four out of the ten policy themes have resulted in Significant positive effects on IIA4. Those significant positive effects are generally attributed to those policies which aim to increase employment opportunities across a number of sectors and provide learning and development opportunities.</p> <p>More specifically Policy EG1 will provide improved job opportunities for all groups of the working population, including those with current low levels of education. The policy also provides jobs across the borough, providing jobs for a range of communities. Similarly, Policy DV1 (within the Delivering the Local Plan theme) protects and enhances existing employment locations within the borough, as well as supporting a mix of new employment opportunities including affordable workspaces, to encourage a diverse range of employment opportunities.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA5: Housing	1	0	0	<p>Whilst a number of minor positive effects have been identified for IIA5, it is just the Homes for the Community policies which have resulted in Significant positive effects. All policies within this theme will help to deliver a wide variety of housing to suit the needs of all residents and exceeds the borough's housing targets.</p> <p>In addition to the delivery of new housing, Policy HFC3 aims to protect existing housing, particularly ensuring that the supply of self-contained homes and in particular family-sized homes is maintained. Similarly, HC4 will ensure that any existing homes meet the latest Decent Homes Standard.</p>
IIA6: Crime & Safety	2	0	0	<p>The People Places and Spaces and Movement and Connectivity policy themes have resulted in significant positive effects on IIA6. These effects have been identified for those policies such as PS4 and MC2 that directly tackle crime and improve safety, as well as those policies that support improvements to the public realm. Improvements to the public realm and incorporation of high-quality design can engender a sense of pride in a place, which in turn can help to discourage crime.</p>
IIA7: Sustainable Transport	1	0	1	<p>The Inclusive Economy and Good Growth policy theme is the only themes that has resulted in significant positive effects on IIA7. Policies within these themes will help to reduce reliance upon the private vehicles and contribute to a modal shift.</p> <p>Whilst the Movement and Connectivity policy theme has the potential to result in significant positive effects through enhanced sustainable transport and support of a modal shift, there is some uncertainty around the additional provision of parking as</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				a result of MC4, and whether this could lead to an increase in the reliance and convenience of motorised vehicles. This will very much depend on the implementation and the number of additional spaces provided.
IIA8: Accessibility	4	0	0	<p>Of the ten policy themes, four have resulted in significant positive effects on IIA8. Policies will improve accessibility by provide greater connectivity to active transport as well as enhancing and increasing access to essential services and facilities for all residents. This will not only result in a modal shift but allow residents to live their lives more locally.</p> <p>Policy PS4 specifically outlines the requirements for development to maintain accessible street networks and enhance connectivity through developments. This includes connectivity to public transport hubs and improving accessibility around the borough.</p>
IIA9: Biodiversity & Natural Capital	2	0	4	<p>All policies within the Biodiversity and Open Space policy theme contribute to improving biodiversity and natural capital across the borough, including improving and enhancing blue and green spaces, green infrastructure, and contributing towards biodiversity net gain (BNG). This has resulted in significant positive effects on IIA9. Additionally, Policy CG9 within Clean and Green Future has resulted in significant positive effects on IIA9 through improvements to biodiversity as a result of reduce air pollution and utilisation of nature-based solutions.</p> <p>Four of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could give rise to the</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				loss of biodiversity and natural capital, but as the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
IIA10: Landscape & Townscape	1	0	2	<p>The Biodiversity and Open Space has resulted in Significant positive effects on IIA10. These policies will help to maintain and enhance the landscape and townscape character in the borough, by enhancing the public realm and preserving Metropolitan Open Land (MOL) and green and blue spaces.</p> <p>Two of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could be insensitively designed and/ or result in the loss of greenspace, but as the location and overall design of proposals is not yet known uncertain effects have been identified.</p>
IIA11: Historic Environment	1	0	4	<p>The People, Places and Spaces policies are the only policy theme that has resulted in significant positive effects on IIA11. Within this groups Policy PS6 specifically outlines the preservation and enhancement of designated and non-designated heritage assets, including archaeological areas and heritage at risk. Policy PS7 also requires the safeguarding of the two World Heritage Sites within the borough, resulting in positive effects.</p> <p>Four of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could be insensitively designed and/ or result in the degradation and loss of the historic environment. As the location and overall design of proposals is not yet known uncertain effects have been identified.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA12: Flooding	3	0	2	<p>The Developing the Local Plan, Clean and Green Future and Biodiversity and Open Space policy themes have both resulted in Significant positive effects on IIA12. Policies within these themes (specifically DV4, CG6, CG7, BO2 and BO3) aim to address flood risk and incorporate measures such as Sustainable Urban Drainage Systems (SuDs) and soft landscaping.</p> <p>Uncertain effects have arisen where there is it is not clear on the number of sites and developments which may come forward as a result of policies. Urban intensification and additional development within the borough could increase flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.</p>
IIA13: Water Quality	2	0	2	<p>The Clean and Green Future and Biodiversity and Open Space policy themes have both resulted in Significant positive effects on IIA12. Policies within these themes (specifically CG8, CG7, BO1 and BO3) aim to protect the water environment and its habitats and ensure that development does not adversely affect the water quality within the borough. Policies also aim to reduce the pressure on the fresh and wastewater systems through reducing demand and increasing water efficiency.</p> <p>Due to the proposed use of water transport, the Reuse, Recycling and Waste and the Movement and Connectivity policy themes have resulted in uncertain effects. There is potential that increase waterborne transport could result in an increase in water pollution and decrease in overall water quality. However, at this stage the potential increase in water transport is not known, so uncertain effects have been identified.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA14: Air Quality	1	0	1	<p>The Clean and Green Future policy theme has resulted in significant positive effects. Policies within these themes (specifically CG9 and MC3) address the poor air quality within the borough and the need for developments to mitigate and improve air quality, including promoting low or zero emission transport and reducing vehicle reliance.</p> <p>Whilst the Movement and Connectivity policy theme has the potential to result in significant positive effects through enhanced sustainable transport, there is some uncertainty around the additional provision of parking as a result of MC4, and whether this could lead to an increase in air pollution in areas with existing public transport connectivity issues. This will very much depend on the implementation and the number of additional spaces provided.</p>
IIA15: Climate Change & Resilience	2	0	0	<p>The Biodiversity and Open Space and Clean and Green Future policy themes have resulted in significant positive effects on IIA15. Both themes (specifically policies BO5, CG1, CG5 and CG6) promote measures such as green roofs and walls, SuDS, and soft landscaping, which will help to address issues such as flooding, pollution and overheating.</p>
IIA16: GHG Emissions	1	0	3	<p>The Clean and Green Futures theme is the only policy theme to result in significant positive effects on IIA16. These policies contribute to reducing GHG emissions through the reduction in energy usage, and vehicle reliance.</p> <p>Due to the potential for significant levels of development and potential increases in embodied carbon, the Movement and Connectivity, Community Infrastructure and Homes for the Community policy themes have resulted in uncertain effects. At this</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				stage it is not clear whether developments include measures to reduce GHG emissions and include renewable energy generation. As many of these measures will be determined by scheme level design, uncertain effects have been identified.
IIA17: Waste	2	0	4	<p>The Clean Green Future and Reuse, Recycling and Waste policy themes have resulted in significant positive effects on IIA17. These policies will help to improve waste facilities, minimise the amount of waste going to landfill, by supporting re-use and recycling and promoting more efficient use of materials.</p> <p>Some proposals which may come forward as a result of the Movement and Connectivity, Homes for the Communities, Community Infrastructure and Inclusive Economy and Good Growth policy themes may be resource intensive and could generate a significant amount of construction waste. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.</p>
IIA18: Efficient use of Land and Resources	1	0	1	<p>The Clean and Green Future policy theme is the only theme to result in significant positive effects on IIA18. Policies CG1 and CG11 aim to minimise the use of natural resources, support a circular economy, remediate contaminated land, improve the quality of land within Tower Hamlets and contribute to the utilisation of brownfield land.</p> <p>There are some uncertain effects associated with the Movement and Connectivity policy theme as the location of some proposals that may come forward as a result of these policies is not yet known. Whilst it is likely that the majority may result in the reallocation of the existing road network, there could be potential for some land</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				take. If a preference for road network reallocation is sought there is potential for positive effects.

6.3 Assessment of Policy Alternatives

- 6.3.1. The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the draft plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 6.3.2. The development of the Local Plan policies has not at this stage identified any key policy alternatives, so the assessment of policy alternatives has assessed two scenarios – the continuation of the existing Local Plan and the application of the London Plan. Both of these plans have undergone examination and proven to be robust and at this stage provide a realistic alternative scenario.
- 6.3.3. In general, the continuation of the existing Local Plan and London Plan Policies have resulted in less significant positive effects. However, the policies within each plan do remain relevant and the majority are fit for purpose.
- 6.3.4. The London Plan lack specific borough details, that the local plan can provide, whilst some of the existing Local Plan policies are outdated, and no longer reflect key issues such as the Covid-19 recovery, rising costs of living and increases in crime against women and girls.
- 6.3.5. The assessment demonstrates a clear need for an updated Local Plan in order to better guide decisions on future development proposals and addresses the needs and opportunities within the borough.
- 6.3.6. **Table 6-4** below provides a summary of the application of these scenarios. It uses the same key to effects outline in **Table 3-2**.

Table 6-4 - Assessment of Policy Alternative Scenarios

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
IIA1: Population and Equalities	<p>The existing Local Plan includes policies such as S.CF1, D.CF2, and D.CF3 that include the supporting of existing community facilities and the development of new community facilities. These policies are likely to preserve the existing community facilities, but also provide facilities such as early education, primary and secondary education, and care facilities. The development of facilities such as this will continue to provide for the future population of Tower Hamlets.</p> <p>Policy S.CF1 also includes measures to ensure accessible facilities and services, providing access for various population groups. However, the existing local plan does not include a specific policy relating to equalities. Minor positive effects have therefore been identified.</p>	+	<p>There are a number of policies within the London Plan, including GG1, GG4 and GG5 that contribute to improvements to communities within Tower Hamlets. The London Plan also aims to improve growth and inclusive development within the Borough, including accessible design with policy D5.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the population in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects. Additionally, as the population in Tower Hamlets is predicted to grow by 8.4%, with more people living on their own and increased in diversity within communities, the policies within the London Plan may not include sufficient infrastructure to provide for future population growth within Tower Hamlets. Therefore, resulting in minor positive effects.</p>	+
IIA2: Human Health	<p>A number of policies within the existing Local Plan will indirectly contribute to improving the health of residents within the Borough through encouraging healthy lifestyles. Policy S.SG1 also includes supporting the delivery of new healthcare facilities, providing for current and future residents of Tower Hamlets.</p> <p>The Plan also includes policy D.SG3 (Health Impact Assessments) which aims to ensure development contributed to a healthy built environment. The policy also requires the enhancement of positive impacts of development and mitigation of negative impacts.</p> <p>The development of new health infrastructure and promotion of healthy communities, alongside Health Impact Assessments, results in significant positive effects.</p>	++	<p>Policy GG3 identifies the need for new developments to assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.</p> <p>The Plan also sets out policies for the provision of housing (Chapter 4), the protection and provision of community facilities, education and health care (S2, S3, GG3), the provision and protection of sports facilities and open spaces (S5, S11), and healthy streets (T2).</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the health and wellbeing in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects.</p>	+
IIA3: Economy	<p>There are a number of policies within the Plan that will contribute to growing the economy in Tower Hamlets. This includes those policies within Chapter 10 (delivering economic growth) and Chapter 11 (revitalising our town centres). The development of policies within these chapters include the chapter policy D.CF4 (public houses), and a number of policies to preserve and enhance the vitality of town centres within Tower Hamlets.</p> <p>The revitalisation of town centres is likely to encourage users into these areas and encourage economic growth within the Borough. Additionally, the preservation of unique high streets such as Columbia Road and Redchurch Street contribute to enhancing the diversity of Tower Hamlets economy. However, since the Covid-19 pandemic, and a rise in interest rates, the economy has changed significantly. Therefore the developments proposed may not reflect the current economic needs of these areas. Minor positive effects are therefore identified.</p>	+	<p>Policy GG5 aims to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners.</p> <p>There are also a number of strategies within the London Plan, namely those within Chapter 6 (Economy) such as E1, E8, E2, and E3 that contribute to improving economic growth and business investment within London.</p> <p>However, since the Covid-19 pandemic, the economy has changed significantly, and the London may not be robust enough to address these issues. Effects are therefore limited to minor positive effects.</p>	+

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
IIA4: Employment	<p>The following policies within the existing Local Plan contribute to employment improvements within the Borough; S.EMP1 (creating investment and jobs), D.EMP2 (new employment space), D.EMP3 (loss of employment space), and D.EMP4 (re-development within designated employment areas).</p> <p>The development of additional employment space provides new opportunities for jobs within the Borough for current and future populations. Additionally, the development of new, and redevelopment of existing, employment spaces may provide a range of workspaces for businesses of varying sizes, providing a diverse range of job opportunities.</p>	+	<p>Policy GG5 plans for sufficient employment and industrial space in the right locations to support economic development and regeneration. The London Plan proposes Growth Corridors and Opportunity Areas which are described as large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility. There is one opportunity area located in Tower Hamlets, the Isle of Dogs.</p>	+
IIA5: Housing	<p>All policies within Chapter 9 of the existing Local Plan improve housing within the Borough, including housing standards. Policy S.H1 (meeting housing needs) outlines the delivery of at least 58,965 new homes across the borough (3,931) per year up to 2031. Within this new housing is a required provision of affordable housing and different housing types. This contributes to supplying housing that fits the needs of residents within the borough, for example, single occupancy rental accommodation.</p> <p>Policy D.H4 also includes measures for specialist housing, including the preservation of existing housing and the development of new specialist housing. Additional policies such as D.H5 (gypsies and travellers accommodation) and D.H6 (student housing) support the needs of a number of groups inclusively.</p> <p>However, as the population of Tower Hamlets is anticipated to grow by 8.4%, the outlined provision of housing may not support the needs of the growing population. Minor positive effects are therefore identified.</p>	+	<p>The London Plan 2021 identifies a 10-year minimum housing supply target of 34,730 homes within the borough over the period 2019/20 to 2028/29. This is equivalent to a minimum requirement of 3,473 homes per year. This is likely to help increase the supply within the borough. A number of policies, including H1, H4, H6 and H7 include the provision of increased and affordable housing, supporting housing requirements within London.</p> <p>The requirement of 50% of all new homes delivered across London to be genuinely affordable, will also help more people access housing and could help to reduce levels of housing deprivation. Policies also support specialist housing for older people (H13), gypsy and traveller accommodation (H14) student accommodation (H15) and shared living (H16), supporting good development to meet the needs of a number of groups inclusively.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting housing in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects.</p>	+
IIA6: Crime and Safety	<p>There is no specific policy within the existing local plan that addresses crime within Tower Hamlets. However, policy D.DH2 (attractive streets, spaces and public realm) does include prime prevention security measures that should be included within developments.</p> <p>The lack of policy relating to crime within the Borough has resulted in significant negative effects.</p>	--	<p>The London Plan does not benefit from a standalone policy on crime and safety; however it is an underlying theme in a number of policies such as supporting the night time economy (HC6) building strong and inclusive communities (GG1) and Safety, security and resilience to emergency (D11).</p> <p>Given the rising crime rates across London, the Plan does not adequately address these issues. Policies are unlikely to significantly address crime within Tower Hamlets, therefore minor negative effects have been identified.</p>	-
IIA7: Transport	<p>Policies within Chapter 16 of the existing Local Plan address travel within the Borough. Policy S.TR1 includes the provision of sustainable travel modes, including walking and cycling. However, the policy does not include detailed measures to address the significant issues on the highway network, including congestion. The policies also try to limit disruptions to the transport network where possible.</p> <p>However, the application of these policies across Tower Hamlets does not include additional new infrastructure to improve transport measures.</p>	+/-	<p>The London Plan sets out measures to meet the Mayor's target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Policies set out in Chapter 10 set out ways in which to reduce the need to travel for both existing and future developments. The Plan also sets out the ambitions of Crossrail 2 and the opportunities this may bring to Tower Hamlets.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting sustainable transport in Tower Hamlets and has therefore resulted in significant positive effects.</p>	++

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
IIA8: Accessibility	<p>There is no specific policy within the existing Local Plan that addresses accessibility of public transport from all social groups. However, policy S.TR1 (sustainable travel) includes indirect effects on accessibility through encouraging accessible public and active travel modes.</p> <p>The Borough is generally well connected through public transport. However, as with the transport policies, the Plan does not include specific implementation measures to ensure accessibility across the Borough.</p>	+/-	<p>Policies within Chapter 10 (Transport) aim to improve the public transport within London. Within this, measures are outlined in order to preserve accessibility for all groups, including disabled and low income users. This also includes the availability for disabled parking spaces.</p> <p>However, these policies have not specifically outlined measures of improving accessibility within Tower Hamlets. Therefore it is likely that accessibility to transport and spaces within the Borough will be preserved, but improvements are less likely to reflect the needs of the population. Therefore minor positive effects have been identified.</p>	+
IIA9: Biodiversity and Natural Capital	<p>Chapter 13 within the existing local plan includes policies that enhance open spaces within Tower Hamlets (S.OWS1, S.OWS2, D.OWS3, D.OWS4). These policies help to enhance biodiversity and protect open space within the Borough, including Metropolitan Open Land. This also includes improving the quality of open spaces in line with the Local Biodiversity Action Plan.</p>	+	<p>There are a number of policies within the London Plan that support the protection, enhancement and net gain in biodiversity (specifically G5, G6, G7, GG2, D8). The London Plan also includes a supplementary design guide (Urban Greening for Biodiversity Net Gain: A Design Guide¹⁷) which sets out ways in which biodiversity net gain can be achieved through new developments.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on biodiversity. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of biodiversity. Both positive and negative effects have therefore been identified.</p>	+/-
IIA10: Landscape and Townscape	<p>There are a number of policies (namely, S.DH1, D.DH2, D.DH6, and D.DH10) that improve the landscape and townscape of Tower Hamlets through high quality design, attractive streets, spaces and public realm; enhancing the townscapes within Tower Hamlets. Additionally, Policy S.OWS1 (Creating a network of open spaces) contributes to preserving the landscape within Tower Hamlets, including the open space and MOL within the Borough. Policy S.DH4 (Shaping and managing views) also contributes to the enhancement and protection of the Tower Hamlets views and landscape, enhancing the public realm.</p> <p>Preserving and enhancing the local landscape and townscape contributes to high quality streetscapes within the Borough and improves the current condition of the landscape and townscape. Significant positive effects are therefore identified.</p>	++	<p>The London Plan understands the pivotal role that the City's unique landscape and townscape plays in shaping its character and sense of place. The plan does not benefit from one specific landscape policy; however, it does underpin a number of policies such as D8, HC1, HC3, G1, G3 and G9. These are aimed at improving the historic and natural environment, which in turn will benefit the landscape and townscape.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on landscape and townscape. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of the local landscape and townscape. Both positive and negative effects have therefore been identified.</p>	+/-
IIA11: Historic Environment	<p>Policies S.DH3 (heritage and the historic environment) aims to preserve and enhance the Borough's designated and non-designated heritage assets, including</p>	+	<p>Chapter 7 of the London Plan sets out heritage and culture policies which aim to sensitively management London's heritage assets, whilst design policies aim to</p>	+/-

¹⁷ London Wildlife Trust, Mayor of London, Urban Greening for Biodiversity Net Gain: A Design Guide [online] available at: https://www.london.gov.uk/sites/default/files/urban_greening_and_bng_design_guide_march_2021.pdf

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
	<p>archaeology and parks and gardens. Additionally, Policy S.DH5 (world heritage sites) safeguards the world heritage sites within the Borough (the Tower of London and Maritime Greenwich). This preserves the sites within the Borough and aims to enhance them where possible through development.</p> <p>However, the policies do not consider heritage at risk assets. Therefore minor positive effects are identified.</p>		<p>avoid harm to, the significance of London’s heritage assets and their settings. These could help to preserve and enhance the borough’s heritage assets.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on the historic environment. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of the historic environment. Both positive and negative effects have therefore been identified.</p>	
IIA12: Flooding	<p>Policy D.ES4 (flood risk) aims to restrict development that is located within flood zone 3a (high risk of flooding). The policy also requires a flood risk assessment for developments that are located within flood zone 2 or 3a. In addition to this, flood risk management measures are required within developments in order to mitigate flood risk from the River Thames and River Lea. Additionally, Policy D.ES5 (sustainable drainage) outlines measures to reduce the risk of surface water flooding and achieve specific run-off rates. However, the policies do not outline specific measures that should be included within developments to minimise flood risk.</p>	+	<p>Policy SI 12 (flood risk management) and SI 13 (sustainable drainage) aim to minimise and mitigate flood risk from developments. The implementation of these policies within Tower Hamlets is likely to contribute to reducing flood risk and be sufficient in minimising flood risk as a result of new developments.</p>	+
IIA13: Water Quality	<p>Policy D.ES6 (sustainable water and wastewater management) outlines reductions in water consumption as part of new developments (maximum of 105 litres per person per day). Additionally, developments should meet BREEAM water efficiency credits. There is also a requirement for new developments to minimise pressure on the combined water network.</p> <p>However, despite preserving water resource, this policy does not enhance water quality. Mixed positive and negative effects have therefore been identified as the existing Local Plan may be insufficient in supporting the preservation and enhancement of water quality within the Borough.</p>	+/-	<p>There are a number of policies within the London Plan that aim to protect and enhance the water environment. Most significantly is Policy SI 17 which explicitly aims to protect and enhance London’s waterways. This aims for new developments to support river restoration including opportunities to improve water quality.</p> <p>Additionally Policy SI 5 (water infrastructure) states that new development should promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, whilst Policy SI 13 (sustainable drainage) states that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the efficient use of land in Tower Hamlets and has therefore resulted in significant positive effects.</p>	++
IIA14: Air Quality	<p>Policy D.ES2 (Air quality), specifically, requires development to meet or exceed the ‘air quality neutral’ standard, including promoting the use of low or zero emission transport and reducing the reliance on private motor vehicles. The aim of this policy is to improve the Borough’s air quality.</p> <p>Additionally, the acknowledgement of required air quality improvements within the plan are likely to contribute to mitigating poor air quality where possible. The application of this plan is likely to be sufficient in tackling air pollution in the Borough.</p>	++	<p>Policy SI 1 (improving air quality) sets out a key criteria for dealing with poor air quality within the city. It states that new developments must not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or create unacceptable risk of high levels of exposure to poor air quality.</p> <p>The cross cutting nature of air quality is acknowledged within the plan, as it features in other policies such as creating a health city (GG3) public realm (D8) and protecting and enhancing London’s waterways (SI17). Policies that support a reduce need to travel and encourage an increase in walking and cycling will also benefit this objective.</p>	++

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
			The application of the London Plan policies is likely to be sufficient in tackling air pollution in Tower Hamlets and has therefore resulted in significant positive effects.	
IIA15: Climate Change	Policy D.ES10 (overheating) and D.ES4 (flood risk) are likely to contribute to positive effects as these policies indirectly. Climate change is likely to result in increased warming and flood events, as well as presenting an increased water requirement. Therefore, these policies are likely to help address the chronic and acute effects of climate change.	+	Policy GG6 (increasing efficiency and resilience) aims to help London become a more efficient and resilient city. This will ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.	+
IIA16: Greenhouse Gases	Policies within the existing Plan acknowledge the need to reduce greenhouse gases and emissions within the Borough. Specifically, Policy D.ES7 (a zero carbon borough) includes measures to reduce carbon-dioxide emissions on sites within Tower Hamlets, including within residential and non-residential developments. However, the Plan does not include measures for localised improvements across the borough, including additional emitters. Mixed positive and negative effects are therefore identified.	+/-	Policy SI 2 (minimising greenhouse gas emissions) states that all new major development should be net zero-carbon, by reducing GHGs in operation and minimising both annual and peak energy demand in accordance with an energy hierarchy. However, the London Plan is working towards becoming a net zero city by 2050, which is 12 years longer than the council's ambition of 2038. Without localised initiatives it's unlikely that the London Plan will help to reach the Council's net zero ambitions, resulting in minor negative effects.	-
IIA17: Waste	There are three policies within the existing Plan that contribute to reducing waste within the Borough (S.MW1, D.MW2, and D.MW3). These policies aim to manage and minimise the waste within Tower Hamlets, identifying a need for waste reduction, and suitable waste facilities. Additionally, new waste facilities will be designed to contribute towards sustainable waste management in line with the Waste Hierarchy.	+	Policies SI 7 (reducing waste and supporting the circular economy) and SI 8 (waste capacity and net waste self-sufficiency) identify the needs for waste reduction and sustainability within London. This will aim to reduce waste and promote circular economy principles within London, managing waste and minimising where possible. Additionally, Policy SI9 (safeguarded waste sites) ensures the protection of London's waste sites.	+
IIA18: Efficient use of Resources	Whilst the Plan does not include a specific policy in reference to the efficient use of resources, including land, other policies are designed to indirectly positively affect resources. Policy S.SG1, as well as other policies, includes specification to utilise brownfield sites within the Borough. The plan also seeks to utilise circular economy principles, reusing and recycling construction materials where possible (policy S.MW1, managing our waste).	+	The London Plan includes Policy GG2 which supports making the best use of land. This aims to enable development on brownfield land, avoid development on greenbelt land and MOL and where appropriate intensify development to make the best use of available site. Policy H1 (increasing housing supply) also aims to optimise the potential for housing delivery on all suitable and available brownfield sites. The application of the London Plan policies is likely to be sufficient in supporting the efficient use of land in Tower Hamlets and has therefore resulted in significant positive effects.	++

7 Assessment of Site Allocations

7.1 Introduction

- 7.1.1. The assessment of the Local Plan sites is summarised below and presented in full in **Appendix G**. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 7-1** below.
- 7.1.2. **Table 7-2** overleaf provides an overview on the performance of the Local Plan policy themes against each IIA objective and **Table 7-3** outlines significant effects based on each IIA objective. For the purpose of the IIA, significant effects are deemed to be the following:
- Significant Positive effects;
 - Significant Negative effects; and
 - Uncertain effects.
- 7.1.3. Further details on the insignificant effects i.e., minor positive, minor negative, mixed and neutral effects are detailed in **Appendix G**. The Appendix also sets out the nature of effects such as magnitude, spatial extent and duration. It should be noted that those effect recorded below are pre-mitigated effects. Details on the specific mitigation measures are included in **Appendix G**, which includes the application of proposed draft policies.

Table 7-1 – Significance of Effect

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0

7.2 Proposed Site Allocations – Summary of Effects

Table 7-2 provides an overview on the performance of the Local policy themes against each IIA objective and Table 7-3 outlines significant effects based on each IIA objective.

Table 7-2 – Overview of Proposed Site Allocations

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Bishopsgate Goods Yard	++	++	++	++	++	+	+	++	++	?	+/-	0	0	+/-	+	+/-	?	+
London Dock	++	++	++	++	++	+	+	++	++	+	+/-	--	0	+/-	?	?	?	+
Marian Place Gasworks and the Oval	++	++	++	++	++	+	++	++	+/-	?	+/-	0	0	+/-	+	+	?	+
Whitechapel South	+	++	++	++	++	?	+	+	++	+/-	+/-	0	0	+/-	-	+/-	?	+
London Metropolitan University	?	?	?	?	?	?	+	+	+	?	+/-	0	0	+/-	-	?	?	+
Whitechapel North	++	++	++	++	++	?	+	+	?	?	?	0	0	+/-	-	?	?	+
Brick Lane and Pedley Street	+	+	++	++	+	?	+	+	-	?	+/-	0	0	+/-	-	?	?	+
Bow Common Lane	+/-	+	++	++	++	+	+	++	+/-	+	-	+	+	+/-	+/-	?	?	++
Chrip Street	++	++	++	++	+	+	+	+	+	+	+	?	+	-	+	+/-	?	+
Ailsa Street	++	++	?	+	++	+	+	+	+/-	+	+/-	-	+/-	+/-	+	+/-	?	+
Leven Road	++	++	+	+	++	+	-	+	+/-	++	+/-	-	+/-	+/-	+	+/-	?	+

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Aberfeldy Estate	++	++	++	++	+	+	-	+	++	++	+	--	?	+/-	-	?	?	+
Bromley by Bow	++	++	+	+	+	+	++	++	+/-	+/-	-	--	?	+/-	-	?	?	+
Blackwall Trading Estate and Leamouth Road Depot	+	++	?	?	+	+	+	+	+/-	+/-	+/-	--	?	+/-	-	?	?	+
Hackney Wick Station	++	++	++	++	++	+	++	++	+/-	+	+	--	?	+/-	-	?	?	++
Hepscott Road	++	++	++	++	++	+	+	+	++	+/-	+/-	--	?	+/-	+	?	?	+
Sweetwater	++	++	++	++	++	+	++	++	+/-	++	+	--	?	+/-	+	?	+	++
Teviot Estate	++	++	+	+	+	+	?	+	?	+	+/-	--	?	+/-	-	?	?	+
Aspen Way	++	+	+	++	+	?	++	+	+	++	+/-	-	0	+/-	-	?	?	+
Billingsgate Market	+	?	+/-	+	+	+	+	++	-	?	+/-	-	-	+/-	-	?	?	+
Crossharbour	++	++	++	+	?	+	+	++	+/-	+/-	+/-	--	-	+/-	-	?	?	+
Limeharbour	+	+	+/-	++	?	+	+	+	+/-	+/-	+/-	--	-	+/-	+	+	?	+
Marsh Wall East	++	++	+	++	++	+	+	++	+/-	?	+/-	--	-	+/-	+	+	?	+

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Marsh Wall West	+	++	+/-	++	++	+/-	+	++	+/-	?	+/-	?	+/-	+/-	+	+	?	+
Millharbour	++	+	++	++	+/-	+	+	+	+/-	+/-	+/-	?	+/-	+/-	-	+	?	+
North Quay	+	++	++	++	+	++	++	++	+/-	?	+/-	-	-	+/-	+	+	?	+
Reuters	+	+	++	+	++	+/-	++	++	+/-	+/-	+/-	-	-	+/-	-	?	?	+
Riverside South	++	++	+	++	?	+	+	++	+/-	?	+/-	-	-	+/-	?	?	?	+
Westferry Printworks	+	+	+	+	?	+	-	+	+/-	+/-	+/-	-	-	+/-	?	?	?	+
Wood Wharf	++	++	+	++	+	+	++	++	+/-	?	+/-	+	+/-	+/-	+	+	?	+
10 Bank Street	+	+	+	+	+	+	+	+	-	?	?	-	-	+/-	+/-	?	?	?
Westferry/Park Place	+	+	?	?	+	+	+	+	-	?	--	--	-	+/-	+/-	?	?	?

Table 7-3 – Summary of Significant Effects

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA1: Population & Equalities	19	0	1	<p>Significant positive effects have been identified for 19 proposed sites. Generally, these sites provide at least 500 new homes per site, including 40% affordable homes and the development of wheelchair adaptable homes. In addition, these sites provide additional retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. These sites also have good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.</p> <p>Uncertain effects have been identified for the London Metropolitan University site as these units will only benefit only benefit students and the delivery may compromises the ability to deliver other priorities, in particular affordable housing and facilities which will benefit the wider community. However, the introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
IIA2: Human Health	21	0	2	<p>Significant positive effects have been identified for 21 proposed site allocations. These sites all provide a housing provision improving health and have the potential to include new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. These sites will reduce levels of health inequalities and provide new facilities, improving physical and mental health and wellbeing and reduce levels of loneliness. They will ensure that the needs of all groups will be met both now and in the future.</p>

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IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Uncertain effects have been identified for two sites – Billingsgate Market and London Metropolitan University. Generally, these sites have existing good access to health services, however there are high levels of health deprivation. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	16	0	3	<p>Significant positive effects have been identified for 16 sites. These sites are well located close to existing town centres and include additional retail development spaces. Generally, this also includes public realm improvements at the ground and platform level. These sites will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p> <p>Uncertain effects have been identified for three proposed sites (London Metropolitan University, Ailsa Street and Blackwall Trading Estate). Generally, the details of these developments are currently unknown. However, there could be potential to provide a mixed-use development which may include retail offering, helping to improve the viability of the town centre.</p>
IIA4: Employment & Skills	20	0	2	Significant positive effects upon employment have been identified for 20 sites. Generally, this is where sites are well located close to existing employment areas, such as the City Fringe Activity Area, Central Activity Zone, or Isle of Dogs Activity Area. These sites are also likely to include employment space as well as retail. This will likely increase employment opportunities.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Uncertain effects have been identified for two proposed sites (London Metropolitan University and Blackwall Trading Estate). The details of these developments are currently unclear. However, there is potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve employment opportunities.
IIA5: Housing	14	0	5	<p>Significant positive effects have been identified for 14 sites. Generally, these sites all provide at least 500 homes per site, helping towards meeting LBTH's housing target. These sites also include at least 35% affordable homes, including wheelchair accessible homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.</p> <p>Uncertain effects have been identified for five sites (London Metropolitan University, Limeharbour, Crossharbour, Riverside South and Westferry Printworks). Generally, this has been attributed where limited information is currently known on the affordability, accessibility, size, type and tenure of homes.</p>
IIA6: Crime & Safety	1	0	5	<p>The majority of sites have resulted in minor positive effects upon crime and safety. This has been detailed in full in Appendix G.</p> <p>One site has resulted in significant positive effects upon crime and safety (North Quay). This site is expected to deliver improvements to public realm and active frontages. This is likely to improve natural surveillance within the site and in turn</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				<p>improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles.</p> <p>Uncertain effects have been identified for five sites (Whitechapel South, London Metropolitan University, Whitechapel North, Brick Lane and Pedley Street, and Aspen Way). It is currently unclear if designing out crime principles will be applied as part of these developments. However, developing these sites from their existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.</p>
IIA7: Sustainable Transport	8	0	1	<p>The majority of sites have resulted in minor positive effects upon sustainable transport. This has been detailed in full in Appendix G.</p> <p>Significant positive effects have been identified for eight sites (Marian Place Gasworks and the Oval, North Quay, Wood Wharf, Reuters and Bromley by Bow). These sites generally have very good access to sustainable transport modes, and high PTAL scores of between 4 and 6a. These sites also include the development of improved cycle and pedestrian access.</p> <p>Uncertain effects have been identified for one site (Teviot Estate) as this site has average access to public transport and it is not clear whether additional sustainable transport will be included within the development of the site.</p>
IIA8: Accessibility	15	0	0	<p>The majority of sites have resulted in minor positive effects upon accessibility. This has been detailed in full in Appendix G.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Significant positive effects have been identified for 15 sites. Generally, these sites have existing good access to transport facilities and services and include the provision for additional improvements to accessibility, including active travel permeability and improvements to wayfinding.
IIA9: Biodiversity & Natural Capital	5	0	2	<p>Five sites have resulted in significant positive effects due to their regard for biodiversity and inclusion of green infrastructure and landscaping, which are expected to provide a significant net gain in biodiversity.</p> <p>The Whitechapel North and Teviot Estate resulted in uncertain effects upon biodiversity as it is currently uncertain whether these sites will have adverse effects on local habitats, or if the sites will meet the required 30% net gain as set out within the Local Plan.</p>
IIA10: Landscape & Townscape	4	0	13	<p>Four sites have resulted in significant positive effects upon landscape and townscape (Sweetwater, Aberfeldy Estate, Teviot Estate and Leven Road). Generally, these sites will have a positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area. Active frontages and green landscapes may also be created and maintained.</p> <p>Thirteen sites have resulted in uncertain effects as at this stage the design details of developments are unknown, however, it is assumed that the developments may improve townscape and landscape setting.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA11: Historic Environment	0	1	2	<p>Significant negative effects on the historic environment have been identified for the Westferry/Park Place site. This site is located in close proximity to a number of heritage assets, including archaeological priority areas, conservation areas, and a Grade 2 listed gate. There is potential for the loss of the Grade 2 listed gate and buried archaeology as a result of development at this site.</p> <p>Uncertain effects have been identified for two sites (10 Bank Street and Whitechapel North). Generally, there is potential for these sites to temporarily adversely affect local heritage assets. However, design details are currently unclear and there is potential for enhancements to the public realm which may improve the setting of the local historic environment.</p>
IIA12: Flooding	0	12	3	<p>In total 12 sites have resulted in significant negative effects for flooding. These sites are all located within areas of flood zone 3 and flood risk areas and there are no detailed flood risk mitigation measures outlined for the developments at this stage.</p> <p>Three sites (Chrip Street, Marsh Wall West and Millharbour) have resulted in uncertain effects on flooding. These sites are located within flood risk areas and it is currently unclear whether these sites will include flood risk mitigation measures.</p>
IIA13: Water Quality	0	0	7	<p>Uncertain effects upon water quality have been identified for seven sites, which are located within close proximity to watercourses. It is currently unclear if any measures to mitigate against water quality impacts will be included within development.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA14: Air Quality	0	0	0	All proposed site allocations have resulted in mixed positive and negative effects upon air quality. This has been detailed in full in Appendix G .
IIA15: Climate Change & Resilience	0	0	3	Three sites (Mariane Place Gasworks and the Oval, Riverside South, and Westferry Printworks) have resulted in uncertain effects on climate change and resilience. Generally, these sites have low overall climate and heat risks, and have some resilience to climate change. However, not all climate resilience measures are known at this stage.
IIA16: GHG Emissions	0	0	20	Uncertain effects have generally been identified for 20 sites where there is potential for significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. However, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
IIA17: Waste	0	0	31	The majority of sites have resulted in uncertain effects on waste. Demolition, excavation, and construction are likely to result in the generation of a significant amount of waste. However, at this stage it is not clear if existing buildings and structures will be re-used or recycled and whether recycled materials will be supported as part of construction.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA18: Efficient use of Land and Resources	3	0	2	<p>The majority of sites have resulted in minor positive effects upon efficient use of land and resources. This has been detailed in full in Appendix G.</p> <p>Three sites (Sweetwater, Hackney Wick Station, and Bow Common Lane) have resulted in significant positive effects on land use. These sites are on previously developed land and will support high density housing and mixed-use development which will help to make the best use of the land within the Borough.</p> <p>Uncertain effects have been identified for two sites (10 Bank Street and Westferry/Park Place). These sites are predominantly on previously developed land, however the density of housing is not currently known nor is it clear whether sustainable use of materials will be encouraged.</p>

7.3 Alternative Site Allocations

- 7.3.1. The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the draft plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 7.3.2. The proposed site alternatives include those sites that are developable but do not meet the 500 minimum capacity targets of the proposed site allocations. There are 12 sites in total. These sites have the potential to come forward as windfall sites in the future if the proposed site allocations above do not provide adequate housing numbers. The sites have therefore, been assessed in the same level of details as the proposed allocations and the summary of effects is presented below.

7.4 Summary of Effects – Alternative Allocations

- 7.4.1. The assessment of alternative sites has resulted in a higher proportion of significant negative effects compared to the proposed site allocations and are less likely to sustainably support development. These effects have been identified for IIA15 (climate change and resilience), IIA12 (flooding), IIA11 (historic environment), IIA8 (accessibility), and IIA7 (sustainable transport).
- 7.4.2. Generally, sites that are located within flood zone 3 have resulted in significant negative effects upon IIA12 (flooding). Similarly, sites located within flood zone 3 and that have high climate and heat risks have resulted in significant negative effects on IIA15 (climate change and resilience).
- 7.4.3. Additionally, a small number of sites have the potential to result in damage or loss of heritage assets located in the site boundaries (IIA11). Significant negative effects have been identified for these sites.
- 7.4.4. Minor negative effects have also been identified where schemes are located in close proximity to priority habitats (IIA9). Development here is likely to result in disturbance to these habitats and species within them.
- 7.4.5. There are a larger proportion of uncertain effects associated with alternative sites when compared to preferred sites. This has largely been identified for IIA1 (population and equalities), IIA2 (human health), and IIA5 (housing) where it is currently unclear what the provision of homes at sites will entail, including the number of homes, affordability and adaptability of homes.
- 7.4.6. A number of uncertain effects have also been identified across IIA objectives where the nature of development at sites is currently unclear, and the provision of additional services is unknown.

Table 7-4 – Overview of Alternative Allocations

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Neptune Wharf	?	?	?	+	?	?	?	+	?	+	?	?	?	+/-	?	?	?	+
Hamlet Industrial Estate	+/-	?	?	?	+/-	?	?	+	?	?	?	--	?	+/-	--	?	?	+
Millharbour South	+	++	+	++	?	+	+/-	+	?	+	+/-	-	?	+/-	--	?	?	+
Orchard Wharf	?	?	+	?	?	+	--	--	-	+/-	+/-	--	?	+/-	?	?	?	+
Tobacco Dock	?	?	+	+	?	+	+	+	?	+/-	--	--	0	+/-	--	?	?	+
Canada Square/Churchill Place	?	?	+	+/-	?	?	-	+	0	-	-	--	?	+/-	+/-	?	?	+/-
London Chest Hospital	?	?	?	?	?	+	+	+	?	+/-	--	0	?	+/-	+/-	?	?	+
LEB Building	?	?	+	?	?	+	+	+	?	+/-	+/-	0	0	+/-	+/-	?	?	+
72-90 Crisp Street	?	?	+	+	?	+	+	+	0	+/-	+/-	--	0	+/-	--	?	?	+
Tower Hamlets Car Pound	?	?	+	?	?	+	+	+	?	+/-	+/-	0	0	+/-	?	?	?	+
Anchor Retail Park	+/-	?	-	+/-	-	?	+	+	0	?	-	0	0	+/-	+/-	?	?	+/-
Republic Estate	+/-	?	+/-	+/-	-	?	-	?	0	?	-	0	0	+/-	+/-	?	?	+/-

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Watney Market	?	?	?	?	?	?	+	+	?	?	?	0	0	+/-	?	?	?	?
Devons Road	+	?	+	?	?	+	+	+	-	+/-	+/-	0	0	+/-	+/-	?	?	+
Hertsmere House	?	?	+	+	?	?	-	+	-	?	+/-	--	0	+/-	+/-	?	?	+
Samuda Estate	?	?	?	?	?	?	?	+	-	?	?	--	-	+/-	--	?	?	?

Table 7-5 – Summary of Significant Effects – Site Alternatives

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA1: Population & Equalities	0	0	10	Alternative sites have largely resulted in uncertain effects on population and equalities. Generally, these uncertain effects have been attributed where the provision of homes does not meet the borough’s housing target and there are uncertainties surrounding site developments. These uncertainties include how many housing units will be affordable and adaptable, and whether additional community facilities will be provided at the site.
IIA2: Human Health	1	0	15	<p>The Millharbour South alternative site has resulted in significant positive effects on human health. The site is well connected to healthcare and community facilities, and is likely to lead to additional community facilities and open spaces, improving health and wellbeing of the local community.</p> <p>Uncertain effects have been identified for 15 alternative sites. Generally, this is as there is potential for the site to increase pressure on existing healthcare and community facilities and it is unclear if additional provisions will be included within development.</p>
IIA3: Economy & Town Centres	0	0	4	<p>The majority of alternative site allocations have resulted in minor positive effects on economy and town centres, this is detailed in full in Appendix G.</p> <p>Four site alternatives have resulted in uncertain effects on economy and town centres (Neptune Wharf, Hamlet Industrial Estate, London Chest Hospital and Watney Markey). There is potential for these sites to include mixed-use</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				development, providing employment and/or retail space. However, this is currently uncertain.
IIA4: Employment & Skills	1	0	8	<p>Millharbour South has resulted in significant positive effects on employment and skills. The site is well located close to employment opportunities, and the area is amongst the 30-50% most deprived areas. The site also has the potential to include additional employment opportunities. Therefore, providing improved opportunities for employment.</p> <p>Uncertain effects have been identified for eight sites. These sites are generally within good access to existing employment areas, however, there is potential for the inclusion of additional employment facilities within the proposed sites although this is currently unclear.</p>
IIA5: Housing	0	0	12	Thirteen alternative sites have resulted in uncertain effects on housing. This has been attributed where housing provisions fall below the borough's targets and the affordability, accessibility, size, type and tenure of homes is unclear.
IIA6: Crime & Safety	0	0	8	Eight alternative sites have resulted in uncertain effects upon crime (Neptune Wharf, Hamlet Industrial Estate, Canade Square/Churchill Place, Anchor Retail Park, Republic Estate, Watney Market, Hertsmere House, and Samuda Estate). These sites have limited detail as to whether designing out crime principles will be applied as part of developments, or whether there will be improvements to the public realm.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA7: Sustainable Transport	0	1	3	<p>Orchard Wharf has resulted in significant negative effects upon sustainable transport. The site is not well located for public transport use and has a PTAL score of between 0 and 1b. This is likely to increase the need for residents to travel by car to access local services and facilities. It is also unclear if any additional public transport provision will be proposed as part of the site.</p> <p>Uncertain effects have been identified for Neptune Wharf, Samuda Estate and Hamlet Industrial estate. Despite these sites having a PTAL score of 2, and access to public transport, it is unclear if improvements to sustainable transport access will be included within development.</p>
IIA8: Accessibility	0	1	1	<p>Orchard Wharf has resulted in significant negative effects upon accessibility as the site has a PTAL score of between 0 and 1b. Therefore, there is potential for the exclusion of social groups who rely on public transport.</p> <p>Republic Estate has resulted in uncertain effects as the site has average access to facilities and service. However, at this stage it is not known if any accessible provision will be included as part of the site.</p>
IIA9: Biodiversity & Natural Capital	0	0	8	<p>Eight sites have resulted in uncertain effects on biodiversity. None of the alternative sites will result in the direct loss of habitats, but they could disturb nearby sites, habitats and species. At this stage, no details have been provided on the provision of green infrastructure and/or open space which could enhance biodiversity, or whether BNG targets will be met on site.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA10: Landscape & Townscape	0	0	6	Hamlet Industrial Estate, Anchor Retail Park, Watney Market, Hertsmere House, Samuda Estate and Republic Estate have all resulted in uncertain effects on landscape and townscape. They are located in areas which have low landscape and townscape values, but currently, the design details for these sites are unknown and whether there will be any inclusion of green spaces or significant enhancements to the public realm.
IIA11: Historic Environment	0	2	4	<p>Both Tobacco Dock and London Chest Hospital have resulted in significant negative effects upon the historic environment. Both these sites have the potential to disturb local heritage assets, and result in the loss of heritage assets as a result of development at these sites.</p> <p>Uncertain effects have been identified for Neptune Wharf, Watney Market, Samuda Estate and Hamlet Industrial Estate as these at this stage it is not clear whether development will include measures to enhance and restore the local historic environment, or whether sensitive design will be implemented.</p>
IIA12: Flooding	0	7	1	Seven alternative sites have resulted in significant negative effects upon flooding (Hamlet Industrial Estate, Orchard Wharf, Tobacco Dock, Canada Square/Churchill Place, 72-90 Chrisp Street, Hertsmere House and Samuda Estate). These sites are all located within areas of flood zone 3 and flood risk areas, and there are no detailed flood risk mitigation measures outlined within the developments at this stage.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA13: Water Quality	0	0	6	Uncertain effects upon water quality have been identified for a number of sites located near to water bodies as it is currently unclear if any measures to mitigate against water quality impacts will be included within development. There is potential that surface water runoff from construction could affect water quality.
IIA14: Air Quality	0	0	0	No alternative sites have resulted in significant or uncertain effects upon air quality. All alternative sites have resulted in mixed positive and negative effects upon air quality, detailed in Appendix G .
IIA15: Climate Change & Resilience	0	5	4	<p>Five sites have resulted in significant negative effects upon climate change and resilience (Hamlet Industrial Estate, Millharbour South Tobacco Dock, Samuda Estate and 72-90 Chrisp Street). Generally, these sites all have medium-high or high overall climate risk and heat risk ratings as well as being at risk of flooding meaning that they have a diminishing resilience to climate change. No climate resilience measures are known at this stage.</p> <p>Four sites have resulted in uncertain effects on climate change and resilience (Neptune Wharf, Orchard Wharf, , Tower Hamlets Car Pound and Watney Market). Generally, these sites have low overall climate and heat risks, and have some resilience to climate change. However, not all climate resilience measures are known at this stage.</p>
IIA16: GHG Emissions	0	0	16	All alternative sites have resulted in uncertain effects upon GHGs. For all developments, there are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether developments will utilise renewable energy sources or low carbon heat networks once operational.
IIA17: Waste	0	0	16	All alternative sites have resulted in uncertain effects upon waste. The demolition, excavation, and construction of sites are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land and Resources	0	0	2	<p>No alternative sites have resulted in significant effects upon efficient use of land and resources. The majority of alternative sites have resulted in minor positive effects, with three sites resulting in mixed positive and negative effects, detailed in Appendix G.</p> <p>Uncertain effects have been identified for Watney Market and Samuda Estate as the density of housing is not currently known nor is it clear whether the sites will encourage sustainable use of materials.</p>

8 Findings from Other IIA Assessments

8.1 Introduction

- 8.1.1. This section presents the findings from the EqIA, HIA and HRA assessments. Further details on these assessments can be found in **Appendix H (EqIA)** **Appendix I (HIA)** and the HRA Screening Report, which has been published separately.

8.2 EqIA Findings

- 8.2.1. Overall, the policies will likely result in positive impacts on protected characteristic group members in the borough. The policies aim to address a wide range of issues, identified by the key themes within the EqIA baseline.
- 8.2.2. The main protected characteristic groups that will particularly benefit include:
- Age – older people who have reduced mobility and require access to health and other services. Also, children who are likely to benefit from air quality improvements that numerous policies look to achieve;
 - Disability – people with a variety of disabilities will benefit from a more accessible environment; and
 - Deprivation – people from low-incomes who require access to employment, education and housing and people with underlying health issues.
 - Sex, Gender reassignment and Race – women and girls, gender diverse people, and people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.
- 8.2.3. Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:
- Age, Disability and Pregnancy and maternity – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups.
 - Deprivation – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.
- 8.2.4. The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:
- Religion or belief;
 - Sexual orientation; and
 - Marriage and civil partnerships.

8.3 HIA Findings

8.3.1. The HIA assessed the NLP policies and considered their impact on the key determinants of health. These have been detailed below:

- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Community policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads, which could contribute to a worsening of air quality.
- **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, contributing to increased road traffic noise in the area. Improvements to entertainment venues and the night-time economy will also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction and developments throughout the borough, reducing the levels of nuisance felt to those living in close proximity to developments.
- **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for our Community theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation. This could have positive effects for many vulnerable groups, predominantly working aged adults (18-64) and those who are homeless.
- **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the borough. In particular, the provision and protection of affordable workspaces will aid in supporting new and emerging economic sectors in the borough. Additional town centre developments and an increase in shops, entertainment venues and food and drink facilities under the NLP is also likely to reduce unemployment in the borough, having positive effects for the unemployed and low-income residents in the borough.
- **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access to education and training. Upskilling opportunities will be particularly beneficial to the health of young people throughout the borough.
- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated

to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces policy theme include safety measurements such as appropriate signage of public areas, good lighting and surveillance. The promotion of a safe living environment will contribute positively to the physical and mental wellbeing of all residents.

- **Access to services:** Positive health effects have been identified. It is assumed that new community housing developments within the borough will have suitable access to community facilities and shops. Additionally, policies under the Community Infrastructure policy theme support development proposals to maximise opportunities for the provision of high-quality community facilities. Access to services will improve the health of elderly residents, improving health and reducing loneliness.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel, from commuting to work to walking for pleasure. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population. Further, the inclusion of town centres within the 15-minute neighbourhood principle may improve physical activity rates.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policy theme. This includes the protection and enhancement of existing biodiversity throughout the borough as well as new provisions to contribute a 30% BNG. The maintenance of green infrastructure and accessible open spaces contributes to improving mental wellbeing by providing spaces for physical activity and social interaction. Green infrastructure could be further promoted through additional requirements under the Homes for the Community policy theme.
- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

8.4 HRA Findings

Stage 1 - HRA Screening (Regulation 18)

- 8.4.1. There are no Habitats sites within LBTH's administrative area, however there are two Habitats that fall within the identified 7.2km Zone of Influence of the borough boundary and as such there will be implications for some of these Habitats sites from the policies of the Local Plan.
- 8.4.2. A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HF1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 AA. These policies have potential for LSE on nearby Habitats sites relating to increased traffic (and therefore impacts on air quality) and increased public access, recreational and development pressures.
- 8.4.3. Given the possibility of LSE associated with the screened-in interventions, further, detailed assessment was considered necessary to satisfy the requirements of the Habitats Regulations as the Local Plan emerges.
- 8.4.4. It is also not possible to rule out in-combination LSE on Habitats sites as a result of policies in the emerging LBTH Local Plan when considered with other strategic plans based on the findings of the screening assessment and a review of the HRAs supporting Local Plans for adjacent authorities.

Stage 2 - Appropriate Assessment (Regulation 19)

- 8.4.5. At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 8.4.6. Policy BO2 was subject to further consultation with the LBTH and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 8.4.7. Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1 resulted in a conclusion when taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold.
- 8.4.8. Air quality considerations for Lee Valley SPA and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway, but also that the qualifying feature (Bittern) for which air quality is indicated as a possible pressure or threat is not anticipated to be present within the components of the SPA/Ramsar within the Zone of Influence of LBTH.

- 8.4.9. Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plan¹⁸¹⁹.
- 8.4.10. Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways between LBTH (as opposed to 'as the crow flies' distances), the reasons for visits to Epping Forest as derived from published visitor surveys, and the presence of more extensive and equally attractive green spaces closer to LBTH for those activities.
- 8.4.11. Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements within the Zone of Influence of LBTH (a component of the overall SPA and Ramsar in the Lee Valley) being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access.
- 8.4.12. The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 8.4.13. For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified. In two instances this has included consideration of mitigation, but these measures are already in place and functioning, or proposed to address in-combination effects as part of strategic infrastructure delivery, not reliant on specific actions undertaken by LBTH.

¹⁸ Thames Water, Water Resource Management Plan, 2019 [online] available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-report/executive-summary.pdf>

¹⁹ Thames Water, Revised Draft Water Resources Management Plan, 2024 [online] available at: <https://www.thameswater.co.uk/about-us/regulation/water-resources>

9 Cumulative Effects

9.1 Introduction

9.1.1. The SEA Regulations require that cumulative effects are considered when identifying likely significant effects. Cumulative effects arise, for instance:

- Where several individual policies and sites have a combined effect on an objective; or
- Where several policies and sites each have insignificant effects but together have a significant effect.

9.1.2. The significance of cumulative effects resulting from a range of activities, or multiple incidences of one activity, may vary based on factors such as the nature of the proposed sites and policies and the sensitivity of the receiving communities and environment.

9.1.3. This section therefore presents the findings of the following:

- Consideration of how different proposed policies and sites within the LBTH may interact and cause cumulative effects on a receptor (Intra-project effects); and
- How the proposed policies and sites within LBTH could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-project effects).

9.2 Intra-Project Effects

9.2.1. The IIA assessment of both policies and strategic sites drew out potential intra-project cumulative effects. These have been identified in **Table 9-2** below.

9.2.2. **Table 9-1** below outlines the key to effects for intra-project cumulative effects.

Table 9-1 – Key to Cumulative Effects

Effect	Key
Positive cumulative effect	+
Negative cumulative effects	-
Mixed cumulative effects	+/-
No overall cumulative effects	0

Table 9-2 - Intra-Project Effects Summary

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
IIA1: Population and Equalities	+	+	+	+	+	+	+	+	+	+	0	<p>There is potential for positive cumulative effects if multiple developments were to arise from the Local Plan. These developments are likely to provide improved infrastructure for current and future populations within Tower Hamlets.</p> <p>However, pressure could be placed on existing services due to increased population demands arising from multiple developments, leading to cumulative negative effects. There is also potential for a cumulative increase in disturbance to existing local residents.</p> <p>Additionally, the Local Plan promotes inclusive design, particularly through the people places and spaces, town centres, and community infrastructure policies, improving access to all social groups inclusively.</p>
IIA2: Human Health	+/-	+	+	+	+	+	+	+	+	+	+	<p>There is a potential for negative cumulative effects to result if multiple housing developments were to come forward due to the increased strain on existing community health facilities and the potential increased demand from new populations.</p> <p>However, community infrastructure policies and some of the proposed developments include the provision of new community facilities and services, such as health provisions and public leisure facilities. Therefore, this could result in positive cumulative effects on health and wellbeing.</p> <p>The provision and improvements to the public realm and open spaces, as part of some of developments and policies, would result in positive effects on the health and wellbeing of the population in Tower Hamlets.</p>
IIA3: Economy	+	+	+	0	+	+	+	+	0	+	0	<p>There is the potential for positive effects on the economy if multiple large-scale developments were to come forward. These developments will provide a substantial amount of office space and jobs, as well as housing provisions, which will help to improve connectivity between employment centres and the housing markets. Multiple site allocations well located to retail centres will likely improve footfall in these areas, improving their vitality.</p> <p>Developments are further supported by the Local Plan's economy and town centre policies which aim to support existing office, industrial and warehouse spaces. This coupled with potential new developments could help to attract further inward investment and provide employment opportunities.</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
IIA4: Employment	+	+	+	+	0	+	+	+	0	0	+	There is potential for positive cumulative effects on employment if multiple employment and economic developments were to come forward. These developments also have the potential to increase access to public transport which will help communities within Tower Hamlets to be better connected to jobs, services and facilities.
IIA5: Housing	+	+	+	+	+	0	0	0	0	0	+	There is potential for positive effects if multiple housing developments within Tower Hamlets were to come forward. These developments will help to meet Tower Hamlets housing target of 52,125 new homes across the borough between 2023-2038 and increase the provision of affordable homes, reducing the significant barriers to housing prevalent in many areas of the borough. There is also potential for cumulative improvements to housing quality and standards across the borough, by taking into account the needs of different groups in the community Adequate provision of wheelchair adaptable homes have the potential to raise accessibility standards and promote inclusion and community cohesion.
IIA6: Crime and Safety	+	+	+	0	+	0	+	+	+	+	+	<p>It is assumed that all new developments will be built to a high standard of safety. There may be potential for positive cumulative effects positive from developing the land to provide housing and public realm improvements, particularly if designing out crime principles are applied.</p> <p>There is potential for negative cumulative effects where the provision of student rooms is brought forward simultaneously, especially in areas with existing student accommodation. Adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour, is of particular concern.</p> <p>Policies support high quality design and landscaping which can also help to generate a sense of pride and ownership within the community, resulting in the potential to reduce crime rates further.</p>
IIA7: Transport	+/-	+	+	+	+	+	+	+	+	+/-	+	<p>There is the potential for positive cumulative effects on sustainable transport if multiple large scale housing developments were to come forward within Tower Hamlets.</p> <p>Most new developments will help to improve access to sustainable transport through improvements to pedestrian and cycle connections, making active travel more appealing to the population within Tower Hamlets. Access to public transport (tube, bus, and rail) will also be improved as part of the developments.</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												<p>This is further supported by the Local Plan policies which will ensure that new development is located in suitable areas where the transport requirements can be met in a sustainable manner, and which actively encourages travel by sustainable modes.</p> <p>The maximisation of parking in some locations with poor PTAL scores (as per Policy MC4) could see a cumulative increase in private vehicle use particularly at those sites which are located in areas with low PTAL scores such as Ailsa Road, Leven Road and Aberfeldy Estate.</p>
IIA8: Accessibility	+	+	+	0	+	+	+	+	+	+	0	<p>There is the potential for positive cumulative effects on accessibility if multiple developments were to come forward. The Local Plan supports enhancements to connectivity and accessibility of public transport, as well as walking and cycling. People, places and spaces and town centres in particular includes measures for accessible public spaces, improving access to all groups inclusively</p>
IIA9: Biodiversity and Natural Capital	-	+	+/-	+	+	-	0	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on biodiversity if multiple large scale housing developments and employment developments were to come forward. Given that a large number of housing allocations are located within Sites of Importance for Nature Conservation, there's potential for a cumulative loss of these sites.</p> <p>Depending upon the number and type of options selected and their proposed location, there is potential for a cumulative loss of land, which could lead to damaged and fragmented habitat connectivity.</p> <p>However, there is the potential for positive cumulative effects. There is potential for the development of additional green spaces, and the inclusion of green infrastructure within developments, that may provide biodiversity enhancements and comply with upcoming Biodiversity Net Gain requirements. Natural capital enhancements are possible through the connection of green spaces and protection of habitats linking population centres which may otherwise be lost or severed through a lack of maintenance or through other development.</p>
IIA10: Landscape and Townscape	+/-	+	+/-	+	+	+/-	+	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on landscapes and townscapes if multiple housing developments were to come forward in close proximity to parks and open spaces and areas with high townscape values. Neighbouring sites within areas designated for the management of views could result in adverse effects on the skyline. During construction of these new developments there is the potential for disturbance to the setting and tranquillity of these areas, temporarily harming the visual amenity.</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												<p>However, positive cumulative effects may arise due to good design of the proposed housing developments, other developments such as employment, and improvements to the public realm, parks and open spaces and the natural environment. In combination, such improvements could enhance the landscape and townscape character over the long term.</p>
IIA11: Historic Environment	-	+	+/-	+	+	+/-	+/-	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on the historic environment if multiple developments were to come forward in close proximity to heritage assets. During construction of these new developments there is the potential for disturbance to the historic environment due to noise, vibration and temporary reductions in air pollution (dust soiling). During operation, these developments have the potential to negatively impact the setting of heritage assets if not sensitively designed.</p> <p>There is also potential for the loss of heritage assets (designated, non-designated and buried archaeology) through land take for housing developments.</p> <p>However, positive cumulative effects may arise due to the historically sensitive design of developments to fit in with the setting of any surrounding designated heritage assets. This will be further supported by People, Places and Spaces policies, which preserves and enhances the historic environment. Additionally, cumulative improvements to the public realm improve the setting of heritage assets. Proposals that prioritise the restoration of existing listed buildings will cumulatively maintain the built heritage for future generations, preserving Tower Hamlets' cultural and aesthetic history.</p> <p>Policies may also result in a cumulative improvement in air quality, and reduction in the degradation of heritage assets.</p>
IIA12: Flooding	+/-	+	+/-	+	+	-	0	0	+	0	0	<p>There is potential for cumulative increases in flood risk arising from housing developments, urban intensification and additional employment developments, due to increases in hard standing and sealed surfaces. Therefore, a large number of new developments could result in potential negative cumulative effects on flooding, particularly for those sites located within flood zone 3..</p> <p>Drainage measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide, particularly through the implementation of sustainable development, climate change and environmental sustainability and natural environment policies. The application of sustainable drainage</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												systems (SuDS) across multiple schemes, especially in combination with green infrastructure (GI), can mitigate the impacts of flooding as a nature-based solution (NbS), contributing to urban resilience and climate change adaptation.
IIA13: Water Quality	-	+	0	+	+	0	0	0	+	-	-	<p>There is potential for cumulative increases in water transportation as a result of movement and connectivity and reuse, recycling and waste policies, increasing water pollution and decreasing water quality. There is also potential for decreases in water quality from housing developments as a result of increases in surface water runoff and impacts on surface water and groundwater, particularly from physical alteration as a result of development from housing allocations.</p> <p>Water quality measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide, particularly through the implementation of sustainable development, climate change and environmental sustainability and natural environment policies.</p> <p>There are potential cumulative benefits arising from delivering the local plan, clean and green future, people places and spaces, and biodiversity and open space policies through promoting water efficiency and improving water quality.</p>
IIA14: Air Quality	+/-	+	+/-	+	+	+/-	+	+	+	+/-	+/-	<p>Temporary negative cumulative effects have the potential to result during the construction phase, if multiple housing or employment developments, with overlapping construction periods, were to come forward. Construction of these developments may temporarily reduce the air quality and worsen air pollution from construction plant emissions, dust and construction traffic.</p> <p>However, if these developments are located with good connectivity to public transport facilities it will enable more people to use public transport modes instead of the use of a private car, helping to improve air quality. Improvements to pedestrian and cycle connections may further reduce reliance on private cars and encourage low-emission sustainable and active travel, in turn providing health benefits. Therefore, there is also the potential for positive cumulative effects to result if multiple housing developments were to come forward.</p> <p>The maximisation of parking in some locations with poor PTAL scores (as per Policy MC4) could see a cumulative increase in private vehicle use particularly at those sites which are located in areas with low PTAL scores such as Ailsa Road, Leven Road and Aberfeldy Estate. This may lead to</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												Policies set out within Delivering the Local Plan, Clean and Green Future, People, Places and Spaces, Town Centres, Community Infrastructure, Biodiversity and Open Space, and Movement and Connectivity themes all help to improve air quality, through measures including low or zero emission transport, increasing accessibility to public transport, increase green infrastructure which will help to reduce air pollution.
IIA15: Climate Change	+/-	+	+	+	+	0	0	0	+	0	0	<p>The addition of increased use of hard standing surfaces as part of the proposed housing developments will increase surface water runoff. Therefore, a large number of new developments could result in potential negative cumulative effects on flooding, particularly for those developments located within flood zone 3.</p> <p>However, a number of policies within delivering the local plan, homes for the community, clean and green future, people places and spaces, and biodiversity and open space help to improve climate resilience through encourage the incorporation of SUDs which will help to reduce overall flood risk within the Borough. These policies also aim to manage heat risk, both internally and externally. These policies will help to provide a cumulative increase in resilience to climate change and the urban heat island (UHI) effect within the borough.</p>
IIA16: Greenhouse Gases	+/-	+	+/-	+	+	-	0	-	+	+/-	+/-	<p>If multiple developments were to come forward there is the potential for these developments to be resource intensive and have high levels of embodied carbon.</p> <p>However, policies set out in clean and green future, people places and spaces, delivering the local plan, and biodiversity and open space all support a transition towards reducing GHG emissions through reductions in energy use, vehicle reliance, or low levels of embodied carbon. These alongside the support for sustainable transport modes, could cumulatively reduce GHGs within the borough.</p>
IIA17: Waste	+/-	+	-	+	+	-	0	-	0	-	+	<p>The Local Plan supports the re-use of materials and the minimisation of waste within developments, predominantly through the Reuse, Recycling and Waste policies. The implementation of circular economy principles and the re-use of materials within developments also contributes to positive cumulative effects.</p> <p>There is potential for cumulative increases in waste produced by demolition, excavation, and construction resulting from developments arising from the Local Plan, including housing and employment developments</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
IIA18: Efficient use of Resources	+/-	0	+/-	+	+	+	+	+	+/-	-	0	<p>The Local Plan promotes the efficient use of land and resources where possible, in a way that makes as much use of previously developed land and brownfield sites as possible. The majority of site allocations are located on either previously developed land or brownfield sites, resulting in positive cumulative effects. However, there are a number of new allocations where there is potential for land take to occur.</p> <p>Some other developments which may arise out of the Movement and Connectivity and Homes for the Community, could result in developments which may not occur on previously developed land or brownfield sites and could result in a cumulative loss of more valuable land, including MOL.</p>

9.3 Inter-Project Effects

9.3.1. **Table 9-3** below outlines the sources of potential inter-cumulative effects, whilst **Table 9-4** details the cumulative effects identified for each of the IIA Topics in relation to these policies and plans. This uses the same key to effects as set out in **Table 9-1** above.

Table 9-3 – Sources of Inter-Cumulative Effects

Policy or Plan	Plan Details
The London Plan, 2021	<p>The London Plan is the Spatial Development Strategy for Greater London and acts as a framework and a vision for the development of London over the next 20-25 years.</p> <p>The London Plan supports major development of London’s growth corridors and Opportunity Areas (areas that will see the most significant change), which have the potential to deliver a substantial number of new homes and jobs in London. The Plan sets out three Opportunity Areas (associated with Crossrail 2) which have the potential to cause cumulative effects in the borough. The boundaries of these Opportunity Areas are yet to be defined. The borough also sits within the Crossrail 2 South Growth Corridor.</p>
Crossrail 2	<p>Crossrail 2 is a proposed rail route in the South East, running from nine stations in Surrey to three in Hertfordshire, providing a new North–South rail link across Greater London, and helping to reduce congestion.</p> <p>The route would free up space on the existing congested SW mainline and would enable more local services to central London that bypass the most congested stations. Trains would likely run south west of Wimbledon serving lines to Epsom, Chessington South, Hampton Court and Shepperton.</p>
Liverpool Street Station	<p>Liverpool Street Station is located in the neighbouring City of London. The station is the busiest nationally, with up to 135 million people using the station annually. Passengers already experience overcrowding, poor accessibility, and limited connectivity. The proposed transformation of the station will deliver greater accessibility and a world-class passenger experience.</p>
55 Bishopsgate	<p>The scheme comprises a 63 storey and 22 storey mixed-use buildings, that will feature a free to visit public roof top, 103,000 sq metres of workspace, auditorium, meeting spaces and spaces to support events and pop-ups. At 284 meters tall, 55 Bishopsgate will become the third tallest tower in the Square Mile.</p>

Policy or Plan	Plan Details
One Exchange Square	<p>Located in the City of London, the 13-storey building will deliver 428,000 sq ft of high-quality workspace and 15,000 sq ft of retail, fronting both Bishopsgate and the newly redesigned Exchange Square.</p>
Mayor of London, Mayor's Transport Strategy, 2021/22	<p>The Mayor's Transport Strategy sets out policies and proposals to reshape transport in London over the next two decades (up to 2038).</p> <p>This sets out plans to transform London's streets, improve public transport and create opportunities for new homes and jobs. Its aim is for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041.</p> <p>The Strategy introduces a Healthy Streets approach. This aims to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business.</p>
Neighbouring Local Plans	<p>Local plans in neighbouring boroughs (City of London, Hackney and Newham) influence cross-boundary development improvements.</p> <p>The plans include:</p> <ul style="list-style-type: none"> ■ City of London draft Local Plan (adoption June/July 2025) ■ Hackney Local Plan 2033 (adopted July 2020) ■ Newham Local Plan Review (Regulation 19) ■ London Legacy Development Corporation Local Plan 2020-2036 (adopted July 2020)
Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	<p>Local Transport Plans and Implementation Plans enable Local Authorities to plan for transport in their areas. They can identify both strategic policy and implementation plans for delivering this policy. Therefore, they identify policy options for implementing transport improvements, including different modes of transport. They also prioritise a number of areas and schemes for development over the plan period.</p> <p>Local Implementation Plans in neighbouring boroughs (City of London, Hackney and Newham) influence cross-boundary transport improvements and major road networks.</p> <p>The plans include:</p> <ul style="list-style-type: none"> ■ Tower Hamlets Transport Strategy 2019-41 ■ City of London Transport Strategy, 2019 ■ Hackney Transport Strategy 2015-2025 ■ Newham Local Implementation Plan

Table 9-4 - Inter-Project Effects Summary

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
IIA1: Population and Equalities	+/-	+	+	+	+	+	+/-	+	<p>There is a potential for negative cumulative effects to result if multiple developments were to come forward across the borough and within neighbouring local authorities due to the increased strain on existing community facilities due to the increased demand from new populations.</p> <p>Positive effects would result from the provision of new community facilities, employment opportunities and services as part of these major developments. New transport schemes (Crossrail 2) will improve access and connectivity to community facilities and services, especially for the people who cannot drive or do not have access to a private car.</p> <p>If multiple housing developments within the borough were to come forward, more people will be placed closer to community facilities and employment opportunities. This will result in positive cumulative effects.</p>
IIA2: Human Health	+/-	+	+	+	+	+	+/-	0	<p>There is a potential for negative cumulative effects to result if multiple housing developments were to come forward, due to the increased strain on existing community health facilities resulting from the increased demand from new populations.</p> <p>The provision and improvements to the public realm and open spaces, as part of some of these housing developments, will result in positive effects on the health and wellbeing of the population in the region. This is because access to greenspace can provide better mental health and wellbeing outcomes including reduced levels of depression, anxiety and enhanced quality of life, as well as helping to bind communities together, reduce loneliness, and mitigate the negative effects of air pollution and excessive noise.</p>
IIA3: Economy	+	+	+	+	+	+	+	+	<p>There is the potential for positive effects on the economy if multiple large-scale developments were to come forward, such as those in opportunity areas. These developments will provide a substantial amount of office space and jobs, as well as housing provisions, which will help to improve connectivity between employment centres and the housing markets.</p> <p>Greater cumulative connectivity will result through investments in sustainable transport developments such as Liverpool Street Station redevelopment and Crossrail. This will help communities to gain greater access to jobs, services and facilities. Access to</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									activities provides the potentiality for people to participate in education, work, social, leisure, cultural, etc. Greater connectivity to Tower Hamlets may also bring about greater tourism opportunities.
IIA4: Employment	+	+	+	+	+	+	+	+	<p>There is the potential for positive effects on employment if multiple large-scale developments were to come forward, such as those in opportunity areas. These developments will provide a substantial amount of office space (particularly 55 Bishopsgate and One Exchange Square) and jobs, which will help to improve connectivity between employment centres.</p> <p>Greater cumulative connectivity will result through investments in sustainable transport developments such as Liverpool Street Station redevelopment and Crossrail. This will help communities to gain greater access to jobs, services and facilities.</p>
IIA5: Housing	+	+	0	0	0	0	+	0	Significant positive effects will result if multiple housing developments, such as those in opportunity areas, were to come forward in combination with Tower Hamlets' proposed development sites. These developments will help to meet Borough specific housing targets set out in their local plans and increase the provision of affordable housing.
IIA6: Crime and Safety	+	0	+	+	+	+	+	0	<p>It is assumed that all schemes and projects will be built to a high standard of safety. There may be potential for positive cumulative effects from developing the land to provide housing and public realm improvements, particularly if designing out crime principles are applied.</p> <p>Using high quality design and landscaping can also help to generate a sense of pride and ownership within the community, resulting in the potential to reduce crime rates further.</p>
IIA7: Transport	+	+	+	+	+	+	+	+	There is the potential for positive cumulative effects on sustainable transport if multiple transport schemes were to come forward, such as Crossrail 2 and neighbouring local transport/implementation plan. These developments will help to increase and improve the offering and connectivity of sustainable transport modes in the region.
IIA8: Accessibility	+	+	+	+	+	+	+	+	There is the potential for positive cumulative effects on accessibility if multiple transport schemes were to come forward, including Crossrail 2 and neighbouring local transport/implementation plan. These developments will help to increase and improve

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									the accessibility within Tower Hamlets and the wider London area, offering increased connectivity. Additionally, there is potential for positive cumulative effects as a result of accessibility to all users, including disabled and low-income users who may rely on public transportation through improved transportation.
IIA9: Biodiversity and Natural Capital	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>Potential for cumulative loss, damage or fragmentation of statutory and non-statutory sites and habitats if multiple developments, across similar timeframes were to come forward. Although it is assumed that protected species would be mitigated at a project level, there are wider impacts on biodiversity.</p> <p>Positive cumulative effects may result through BNG over multiple development plans. These are likely to be driven by the London Plan 2021 policies where green infrastructure should be incorporated in design to increase biodiversity and if biodiversity is lost on site this should be mitigated by improving the quality or management of the rest of the site or deliver off-site compensation of better biodiversity value.</p> <p>Further positive cumulative effects will result from the development of sustainable transport schemes (Crossrail 2). This will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions, journey times and congestion, resulting in increased tranquillity and air quality.</p>
IIA10: Landscape and Townscape	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	The provision of public realm improvements through the London Plan, Local Plans and transport/implementation plans could help to increase and improve the open space offering as well as the setting of the borough's townscape and landscape. This will result in positive cumulative effects; however, multiple developments could result in a cumulative loss of open spaces, and obstructions to key views, particularly from tall buildings without height restrictions.
IIA11: Historic Environment	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There is the potential for temporary negative cumulative effects on the historic environment if multiple housing developments and transport schemes were to come forward. During construction of these developments there is the potential for disturbance to the historic environment due to noise and air pollution.</p> <p>Positive cumulative effects will arise due to the historically sensitive design of the proposed housing developments to fit in with the setting of any surrounding designated heritage assets and Conservation Areas, including World Heritage Sites.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									<p>Positive cumulative effects will also result from the development of sustainable transport schemes (Crossrail 2). This will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions, journey times and congestion, resulting in increased tranquillity and setting of the historic environment.</p> <p>Further potential positive effects could result due to the improved access to the historic environment by the new transport schemes which could present opportunities to generate activity and vitality.</p>
IIA12: Flooding	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>The addition of increased use of hard standing surfaces as part of the proposed opportunity areas and transport developments will increase surface water runoff, therefore, resulting in potential negative effects on flooding.</p> <p>However, the proposed developments are likely to incorporate permeable surfaces and SUDs which will help to reduce flood risk if implemented county-wide. These are likely to be driven by the London Plan 2021 policies regarding flood risk management.</p>
IIA13: Water Quality	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There is potential for cumulative increase in surface water runoff and flood risk, and impacts on surface water and groundwater, particularly from physical alteration as a result of development. Drainage and water quality measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide.</p>
IIA14: Air Quality	+	+/-	+/-	+/-	+/-	+	-	+/-	<p>Temporary negative cumulative effects have the potential to result during the construction phase, if multiple developments were to come forward. Construction of these developments may reduce the air quality through an increase in particulate matter and dust.</p> <p>Positive cumulative effects will result through the development of sustainable transport schemes (Crossrail 2). In combination with new Local Plan sites and policies, this will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions and improving air quality. Further positive cumulative effects will result from the reduction in journey times and congestion on the highway network.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
IIA15: Climate Change	+	+	+	+/-	+/-	+	+/-	+/-	<p>Climate change adaptation measures are likely to be specific to each development, but there may be cumulative benefits if implemented across multiple plans (as set out in the London Plan, Mayor's Transport Strategy and neighbouring Local Plans).</p> <p>Temporary negative cumulative effects have the potential to result during the construction phase if multiple housing and commercial developments were to come forward. Construction of these developments may increase levels of greenhouse gas emissions through the embodied carbon associated with the construction and maintenance of the development. Investment in sustainable transport schemes, such as Crossrail 2, will have positive cumulative effects on climate change due to the reduction of private car use and therefore, greenhouse gas emissions.</p> <p>Positive cumulative effects have the potential to result if multiple housing and commercial developments were to come forward, due to the provision of public realm improvements and enhancements to biodiversity as part of the design. Further positive effects may result from low carbon and energy efficient design, which is resilient to the effects of climate change. Climate change adaptation measures are likely to be specific to each development,</p>
IIA16: Greenhouse Gases	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There may be cumulative benefits from transport initiatives (including Crossrail 2 and proposals set out in Mayor's Transport Strategy, and neighbouring transport/implementation plans) and low carbon developments (as set out in the London Plan and neighbouring local plans) in reducing greenhouse gases, however, increased development is also likely to increase transport related greenhouse gas emissions, particularly where this leads to increases in vehicular traffic as well as embodied carbon due to development.</p>
IIA17: Waste	+/-	-	-	-	-	-	+/-	+/-	<p>There is potential for negative cumulative effects on waste as a number of large-scale projects, such as HS2 and Crossrail 2 coupled with development in the borough, could lead to a large cumulative use of resources and production and disposal of waste during construction. There is potential for developments to encourage the sustainable use of resources and encourage re-use and recycling initiatives to minimise waste going to landfill.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
IIA18: Efficient use of Resources	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	There is potential for negative cumulative effects on the efficient use of land as a number of large-scale projects, such as Crossrail 2, Liverpool Station, 55 Bishopsgate, One Exchange Square and Tower Hamlets Opportunity Area coupled with other development in the borough, could lead to a large cumulative loss of land, some of which may not be brownfield land. However, positive cumulative effects could arise if the majority of the of proposed developments are situated on brownfield sites.

10 Mitigation, Enhancements and Monitoring

10.1 Mitigation and Enhancement Measures

- 10.1.1. Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of IIA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan. The measures are known as ‘mitigation’ measures. Mitigation measures include both proactive avoidance of adverse effects and actions taken after potential effects are identified.
- 10.1.2. The mitigation measures proposed in **Table 10-1** are designed to avoid or reduce the effects identified as potentially negative through the policy assessments on the IIA Objectives. The table also includes enhancement measures, that aim to optimise positive impacts and enhance sustainability. Both enhancement and mitigation measures do not always sit within the control of the Local Plan and can be achieved through other plans and strategies.
- 10.1.3. Policy and site-specific mitigation measures have been included within **Appendix F and G**.

Table 10-1 – Proposed Mitigation and Enhancement Measures

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA1 - Population and Equalities	Inclusive mobility guidance should be adhered to ensure designs are accessible for everyone.	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA2 - Human Health	The loss of community facilities to make way for site allocations should be avoided. Where a loss can't be mitigated, these should be reprovisioned elsewhere.	Inclusion within preferred Local Plan policies Project level design and assessment Community engagement
IIA1 - Population and Equalities IIA2 - Human Health	Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities.	Project level design and assessment as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA4 – Employment and skills	Employment should be focused on local residents in the first instance. Policies should aim to increase employment for all protected groups where barriers to employment and education exist (low-incomes, younger people, disabled).	Inclusion within preferred Local Plan policies
IIA1 - Population and Equalities	Community safety, health and equalities should be considered in design, for example, pedestrian networks, including linking new developments into existing infrastructure, lighting and other	Inclusion within Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA2 - Human Health IIA6 – Crime and Safety	safety design considerations, materials used (contrasting colours, non-slip surfaces), accessibility for all including those with reduced mobility or disability, well-being, affordability of schemes, active travel.	Project level Community Safety Assessment, EqIA and HIA as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA7 – Sustainable Transport IIA8 - Accessibility	<p>Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people and low income groups, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p> <p>The Local Plan should also support community engagement with various groups prior the development of transport infrastructure.</p>	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA as part of subsequent EIA/ planning application Tower Hamlets Transport Strategy 2019-2041 The Mayor’s Transport Strategy
IIA1 - Population and Equalities IIA2 – Health and Wellbeing	Where policies and site allocations make provision for open spaces and public realm improvements, there is a need for these spaces to be well designed and well lit, to ensure that they are safe and feel safe for all users, particularly after dark.	Inclusion within preferred Local Plan policies Project level design and assessment as part of subsequent EIA/ planning application

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA6 – Crime and Safety	<p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p> <p>Accessible surfacing should be considered for wheelchair users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p>	Community engagement
IIA1 - Population and Equalities IIA10 - Landscape and Townscape	Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs.	Project level design and assessment as part of subsequent EIA/ planning application
IIA3 – Economy and Town Centres	Where sites are located within or in close proximity to local and neighbourhood shopping centres/ parades it is imperative that development does not detrimentally impact on the vitality of the designated centre.	Project level design and assessment Community engagement
IIA3 – Economy and Town Centres IIA4 – Employment and Skills	The loss of businesses should be avoided. Where it cannot be avoided, discussions with owners should be undertaken to ensure suitable alternative locations are identified and/or adequate compensation is provided particularly where businesses may need to be temporarily closed or relocated during construction.	Inclusion within preferred Local Plan policies Community engagement Project level design and assessment

IIA Objective	Mitigation/ Enhancement	Mechanism
	Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.	
IIA4 – Employment and skills	Where new development comes forward in close proximity to existing shop frontages and businesses, there’s a need to ensure that they can remain open and maintain their existing business hours.	Inclusion within Local Plan policies Project level design and assessment as part of subsequent EIA/ planning application
IIA6 – Crime and Safety	<p>Development should incorporate designing out crime principles, particularly for those potential development sites located in areas with high levels of crime deprivation.</p> <p>Although crime is incorporated within the Local Plan, it currently doesn’t currently have its own standalone policy. Given the high levels of crime in some areas of the borough, reductions in crime could be better supported by planning policies.</p> <p>Development should consider the Handbook Creating Places That Work For Women and Girls²⁰.</p>	<p>Incorporation within the Local Plan policies</p> <p>Project level design and assessment as part of subsequent EIA/ planning application</p>

²⁰ London Legacy Development Corporation, Creating places that work for women and girls, Handbook for Local Authorities, Developer and Designers, July 2024 [online] <https://www.queenelizabetholympicpark.co.uk/about-us/how-we-work/handbook-creating-places-work-women-and-girls>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA9 – Biodiversity and Natural Capital	<p>Consideration needs to be given to the potential effects of construction of developments (noise, vibration and air pollution) on biodiversity.</p> <p>A Lighting Strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p>	<p>Inclusion within Local Plan policies</p> <p>Project level design and assessment (including noise assessments/ surveys)</p> <p>Lighting Strategy</p>
IIA9 – Biodiversity and Natural Capital	<p>For those sites that incorporate existing green space, Phase 1 habitat surveys should be undertaken to identify any habitats and species.</p>	<p>Project level assessment</p>
IIA10 - Landscape and Townscape	<p>Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.</p> <p>As outlined in the draft Tall Buildings SPD²¹ Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact</p>	<p>Scheme level design and planning application</p> <p>Application of the Tall Buildings SPD</p>

²¹ London Borough of Tower Hamlets, Tall Buildings SPD, Consultation Draft [online] available at: <https://talk.towerhamlets.gov.uk/tallbuildings>

IIA Objective	Mitigation/ Enhancement	Mechanism
	assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).	
IIA10 - Landscape and Townscape IIA11 - Historic Environment	<p>New developments should seek to maximise sustainability benefits from existing landscape, townscape and heritage assets by valuing them inherently and for the wider services they provide.</p> <p>Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. Development proposals in designated views should comply with London Plan Policy HC4.</p>	<p>Historic Landscape Characterisation</p> <p>Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application</p> <p>Heritage Impact Assessments</p>
IIA10 - Landscape and Townscape	Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.	Project level design and planning applications
IIA11 - Historic Environment	<p>Promoters and designers should liaise closely with Tower Hamlets and Historic England to avoid or minimise negative effects, such as land take and light pollution, whilst seeking to maximise benefits, such as tranquillity.</p> <p>Where developments are being built and/or improved within, or close proximity to designated historic assets, visual effects assessment should be undertaken to determine magnitude of impact and possible mitigation.</p>	<p>Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application</p> <p>Heritage Impact Assessments</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA11 - Historic Environment	Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA11 – Historic Environment	<p>Characterisation work should be undertaken to understand the potential impact of site allocations on historic places and inform assessments of an area’s capacity to accommodate development.</p> <p>Site specific studies, such as archaeological desk-based assessment and fieldwork, may also be necessary to provide adequate information.</p>	Historic Landscape Characterisation Archaeological desk based assessment
IIA10 - Landscape and Townscape IIA11 - Historic Environment	Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes.	Historic Landscape Characterisation Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application
IIA10 - Landscape and Townscape	Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.	Scheme level design as part of subsequent EIA/ planning application

IIA Objective	Mitigation/ Enhancement	Mechanism
	As outlined in the draft Tall Buildings SPD ²² Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).	
IIA14: Air Quality	A Dust Management Plan should be compiled prior to demolition and construction of new sites.	Project level Construction Environmental Management Plan (CEMP)
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions	Development should ensure design that is resilient to the current and future risks of climate change i.e. extreme heat, cold and precipitation. This could include the use of locally available, renewable, or reclaimed resources, as these are often more resilient. New developments should incorporate renewable energy generation	Project level design and assessment as part of subsequent EIA/ planning application

²² London Borough of Tower Hamlets, Tall Buildings SPD, Consultation Draft [online] available at: <https://talk.towerhamlets.gov.uk/tallbuildings>

IIA Objective	Mitigation/ Enhancement	Mechanism
	methods, such as solar panels, to reduce the carbon emissions of the site.	
IIA12 – Flood Risk	<p>Sequential testing should be undertaken, to avoid sites with the highest flood risk. Where this isn't viable and proposed sites are located within flood zones 2 or 3 a full flood risk assessment should be undertaken.</p> <p>Scheme level design should also consider the incorporation features to reduce flood risks, both now and in future, in light of future precipitation changes associated with climate change. This could include features such as sustainable urban drainage solutions (SuDs), permeable paving and natural engineering such as tree planting.</p>	<p>Project specific transport plans/assessments as part of subsequent EIA/ planning application</p> <p>Incorporation within the Local Plan policies</p>
IIA12 – Flooding	Flood Risk Assessments should be undertaken for all developments located in Flood Zone 2 or 3. The inclusion of SuDS should be implemented where developments are located in flood zones.	Project level design and assessment as part of subsequent EIA/ planning application
IIA13 – Water Quality IIA18 – Waste	Vessels used to facilitate the movement of waste will need to adhere to the Maritime and Coastguard Agency Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations 2008 and other best practice to minimise pollution and effects on water quality.	Project level design and assessment as part of subsequent EIA/ planning application

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions IIA17 – Waste IIA18 – Efficient use of resource	Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy and should consider BREEAM and BREEAM Infrastructure. Sustainable design and construction techniques should be promoted, such as low energy lighting and opportunities for renewable energy regeneration.	Project level design and assessment as part of subsequent EIA/ planning application CEMP/ OEMP
IIA17 – Waste IIA18 – Efficient use of resource	Proposed sustainable transport infrastructure such as cycle lanes, bus lanes and footpaths, should where appropriate, prioritise the reallocation of the highway network.	Project level design and assessment as part of subsequent EIA/ planning application Tower Hamlets Transport Strategy 2019-2041
IIA17 – Waste IIA18 – Efficient use of resource	A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).	Project level design and assessment – CEMP and OEMP

10.2 Monitoring Measures

- 10.2.1. The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.
- 10.2.2. The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the IIA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:
- IIA1 and IIA2: The effects of a growing population on community facilities and services;
 - IIA5: The number of affordable and adaptable housing provided;
 - IIA9: The number of new developments achieving biodiversity net gain;
 - IIA10: The potential effects on key views;
 - IIA12: Flood risk of new development;
 - IIA16: Levels of embodied carbon from new development; and
 - IIA18: Levels of waste generations on new developments.
- 10.2.3. It should be noted that these uncertain effects are generally where limited scheme information is currently available.
- 10.2.4. **Table 10-2** below sets out those monitoring measures which could be suitable in monitoring those uncertain residual effects outlined above. Targets have either been taken from the preferred Local Plan or the London Plan. These are subject to change as the plan develops.

Table 10-2 – Proposed Monitoring Measures

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
IIA1 and IIA2: The effects of a growing population on community facilities and services	<p>The number of new healthcare and community services provided.</p> <p>Ratio of patient-to-staff numbers at GP practices</p>	No targets included as part of the Local Plan or London Plan
IIA5: The number of affordable and adaptable housing provided	<p>The number/ percentage of affordable homes being delivered within the borough.</p> <p>The number/ percentage of adaptable homes or specialist accommodation being delivered within the borough.</p>	<p>Policy HF2 of the Local Plan:</p> <ul style="list-style-type: none"> ■ Deliver a minimum of 40% affordable housing (by habitable room) on-site when seeking to provide 10 or more new residential units; ■ Deliver a minimum of 50% affordable housing (by habitable room) on-site through the redevelopment of affordable housing, estate regeneration schemes and industrial land for residential use; and ■ Deliver the required amount of affordable homes in accordance with a 85% social homes and 15% intermediate homes tenure split. <p>Policy D7 of the London Plan:</p>

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
		<ul style="list-style-type: none"> Delivery of at least 10% of dwellings meet Building Regulation requirement M4(3)²³ 'wheelchair user dwellings'
IIA9: The number of new developments achieving biodiversity net gain	The number of new developments achieving biodiversity net gain	<p>Policy BO4 of the draft Local Plan:</p> <p>To deliver a minimum 2.5 biodiversity unit per hectare increase or 30% gain (whichever is higher) in habitat value for wildlife compared with the pre-development baseline</p>
IIA10: The potential effects on key views	Number of tall building applications granted planning permission within key view areas	No targets included as part of the Local Plan or London Plan
IIA11: Potential negative effects from new developments on heritage assets	<p>Number of developments within a conservation area</p> <p>Number of applications granted planning permission contrary to advice from Historic England</p>	No targets included as part of the Local Plan or London Plan

²³ HM Government, The Building Regulations, Access to and Use of Buildings (M), 2011 [online] available at: https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
IIA12: Flood Risk	Number of Environment Agency objections to planning applications.	No targets included as part of the Local Plan or London Plan
IIA16: Levels of embodied carbon from new development.	The number of development proposals that meet London’s Energy Transformation Initiative (LETI) 2020 best practice embodied carbon emission targets	Policy CG4 of the draft Local Plan: <ul style="list-style-type: none"> ■ Domestic buildings should achieve embodied carbon limits of 500kg CO2/m² or less; and ■ Non-domestic buildings should achieve embodied carbon limits of 600kg CO2/m² or less.
IIA18: Uncertain effects of waste generations on new developments	<p>The amount of construction and demolition waste going to landfill (through Site Waste Management Plans or BREEAM Infrastructure)</p> <p>The number of new developments which incorporate waste saving initiatives</p> <p>Household and commercial waste and recycling figures for the borough</p>	As per Policy SI 7 of the London Plan: <ul style="list-style-type: none"> ■ Zero biodegradable or recyclable waste to landfill by 2026 ■ Meet or exceed the municipal waste recycling target of 65% by 2030 ■ Meet or exceed the targets for each of the following waste and material streams: <ul style="list-style-type: none"> • a) construction and demolition – 95% reuse/ recycling/ recovery • b) excavation – 95% beneficial use

11 Recommendations

- 11.1.1. This section sets out the recommendations identified throughout the IIA assessment. These have been taken from the IIA Report, HIA, EqIA and HRA. It should be noted that these are different from the mitigation measure outline in **Section 11** above, as they focus on potential changes to the Local Plan, rather than measures identified in response significant effects.
- 11.1.2. Some of these changes have been made to the Local Plan since the Regulation 18 consultation, whilst some additional measures from the preferred plan have since been identified. Some recommendations fall out of scope of the Local Plan and may be delivered by other plans and strategies.
- 11.1.3. **Table 11-1** below outlines these recommendations.

Table 11-1 – IIA Recommendations

Item	Recommendation	Source Document
Policy HF1	<p>If using mandatory ballots, residents need to be informed and engaged in the process of change for it to be a meaningful process. It is suggested that resources are allocated to allow assistance with the co-design of schemes with the community.</p> <p>Where engagement is low, measures should be explored to increase this and low engagement should not form a barrier to schemes being approved. It could be beneficial to use consultants for this exercise who are experienced in working with groups where engagement may be low.</p>	EqIA
Policy CG4	<p>Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers.</p> <p>Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.</p>	EqIA

Item	Recommendation	Source Document
Policy CG6	Part 8 could be reworded to <i>'Nature based solutions such as natural drainage systems and planted landscapes...'</i>	IIA Policy Assessment Appendix F
Policy CG9	Policy CG9 could benefit from including the promotion of public or active travel modes within the policy, rather than just stating electric vehicles or sustainable movement patterns.	IIA Policy Assessment Appendix F
Policy PS5	For Part G, it may be more inclusive to include all local groups and genders rather than specifically women. Policy supporting text could also include further statistics on LGBTQIA+ communities as it is currently quite focused on male and female genders. Additional reference could be made to the Tackling Violence Against Women and Girls Strategy (2021) and Inclusive Spaces and Places for Girls and Young People, An Introduction for Local Government (2023).	IIA Policy Assessment Appendix F
Policy PS1, PS3 and PS4	These policies could incorporate elements of climate resilient design. This could include specific aspects such as rainwater and flood attenuation, SuDs, permeable paving, green roofs etc. Reference could also be made to urban creep.	IIA Policy Assessment Appendix F
Policy PS1	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.	EqIA/ HIA
Policy PS2	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.	EqIA/ HIA

Item	Recommendation	Source Document
	Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.	
Policy PS3	PS3 touches on efficiency as part of design which could be strengthened by inclusion (either within the policy or supporting text) on what type of efficiency measure these could include i.e. water efficient measures, energy efficient measures etc.	IIA Policy Assessment Appendix F
Policy PS9	Shopfronts act as key sites to reduce sensory overload for the neurodivergent population of the borough. Enhancement of appearance should not compromise the accessibility of neurodivergent people.	EqIA
Policy PS10	Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.	EqIA/ HIA
Policy EG1	This policy could benefit from including new employment space to provide a range of diverse employment opportunities, from a range of sectors.	IIA Policy Assessment Appendix F
Policy TC2	This policy could benefit from including accessibility requirements for town centres under 4 (b).	IIA Policy Assessment Appendix F
Policy TC7	More emphasis should be placed on ensuring that night time uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy	IIA Policy Assessment Appendix F EqIA

Item	Recommendation	Source Document
	TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.	
Policy CI1	The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities.	EqIA
Policy CI2	<p>the explanation of Part 2 could benefit from including further explanation as to how inclusive design can improve access to disabled users and those with mobility issues.</p> <p>Policy CI2, Part 2 could also benefit from including the promotion of schemes to provide access to low-income groups.</p>	IIA Policy Assessment Appendix F
Policy BO1	<p>Part b could be changed to "maintain and enhance" the open character of MOL</p> <p>Part d (ii) could be amended to include safety measures, such as lighting and clear lines of sight.</p>	IIA Policy Assessment Appendix F
Policy BO2	<p>Accessible surfacing should be considered as part of the policy for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.</p>	EqIA/ HIA
Policy BO4	This policy should also make reference to the requirements of BNG under the Environment Act 2021 and Defra's Biodiversity Metric. Part 2 of the policy is quite complicated and some of the text could be moved to the supporting text.	IIA Policy Assessment Appendix F

Item	Recommendation	Source Document
Policy BO6	Part 2 (b) could include mention of suggested barriers to tackle barriers to inclusion and equality. Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.	IIA Policy Assessment Appendix F EqIA/ HIA
Policy BO7	Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.	EqIA/ HIA
Policy RW2	Policy RW2 could benefit from acknowledging and implementing circular economy principles within the development of new waste sites.	IIA Policy Assessment Appendix F
Policy MC2	The policy could benefit from including mention of how sustainable transport can improve access to those on low-incomes.	IIA Policy Assessment Appendix F
Policy MC4	This policy should reconsider the maximisation of car parking, and focus on improving sustainable transport links where PTAL scores are low, rather than encourage further use of private vehicles. This will disproportionately affect those groups (such as low income groups) who may not have access to private vehicles.	IIA Policy Assessment Appendix F EqIA
Policy MC4	Policy should ensure that cycle parking should be high-quality and suitable for a range of cycles including adapted cycles and cargo bikes as per the London Cycling Design Standards ²⁴ .	EqIA

²⁴ Transport for London, London Cycling Design Standards, 2014 [online] available at: <https://content.tfl.gov.uk/lcds-chapter1-designrequirements.pdf>

Item	Recommendation	Source Document
	<p>Management should protect priority bays to maintain accessibility for protected groups.</p> <p>Policy should ensure that EV charging points should adhere to the British Standards Institution’s Electric vehicles Accessible charging – Specification (PAS 1899:2022)²⁵</p>	
Homes for the Community	<p>It should be noted that the Decent Home Standard is currently applicable to the social rented sector whilst the Decent Homes Standard in the private rented sector is undergoing consultation.</p> <p>More information could be provided on what the policies mean by 'sustainable' residential development i.e., does this include renewable energy regeneration, use of sustainable materials, well located to sustainable transport etc.</p>	IIA Policy Assessment Appendix F
Policy HF1	Like Policy HF6, HF1 should also ensures that developments employ high quality design and is sympathetic to local character and heritage.	IIA Policy Assessment Appendix F
Policy DV6	The policy could incorporate community engagement within the policy. It is implied within the supporting text but the important role it plays in adding social value to new developments isn't overly clear.	IIA Policy Assessment Appendix F

²⁵ British Standards Institution’s Electric vehicles Accessible charging – Specification (PAS 1899:2022) [online] available at: <https://www.bsigroup.com/en-GB/our-services/events/webinars/pas-1899-launch/#:~:text=PAS%201899%3A2022%20is%20a, and%20indicators%20to%20be%20provided.>

Item	Recommendation	Source Document
All Sites	Where possible, further details should be provided on the proposed Site Allocations to ensure a more accurate assessment. This includes quantum and types of housing, percentage of affordable housing as well as additional community facilities.	IIA Site Assessment Appendix G
Bishopsgate Goods Yard Housing Allocation	The 5-a-side football pitches should be re-provisioned elsewhere in the borough, to avoid a loss in community facilities.	IIA Site Assessment Appendix G

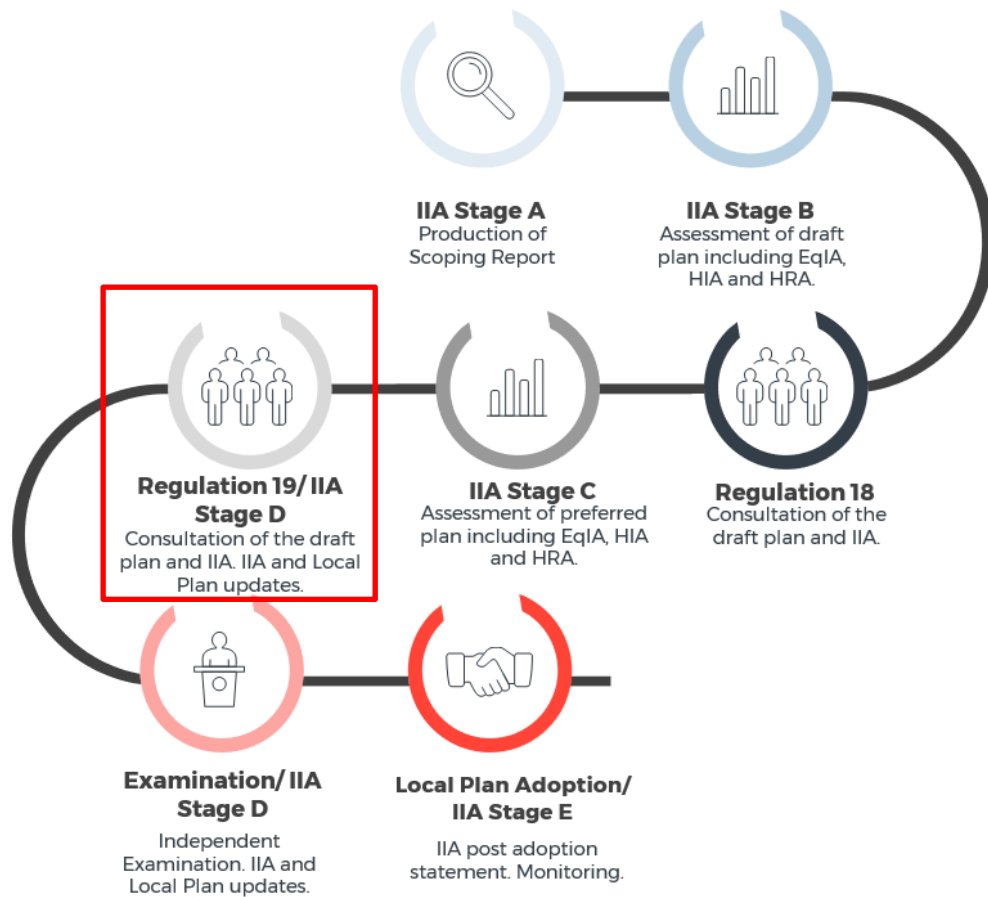
12 Next Steps

- 12.1.1. LBTH is seeking the views of statutory bodies, the public and other stakeholders on the results of the IIA. Consultation at this stage continues to ensure that the IIA provides a robust assessment of the Local Plan.
- 12.1.2. This IIA Report will be issued to consultees for consultation alongside the draft Local Plan (Regulation 19 Consultation) in Summer 2024.
- 12.1.3. An indicative timetable of the remaining stages of the IIA and Local Plan have been included in **Table 12-1** below.

Table 12-1 – Indicative Local Plan and IIA Timetable

IIA/ Local Plan Stages	Timescales
SA Report (IIA Stage C)	Spring/Summer 2024
Regulation 19 Consultation (IIA Stage D)	Summer 2024
Examination (IIA Stage D)	Early 2025
IIA Post Adoption Statement (Stage E)	Autumn/Winter 2025

Figure 12-1 - Local Plan and IIA Stages – Next Steps



Appendix A

Assurance Checklist

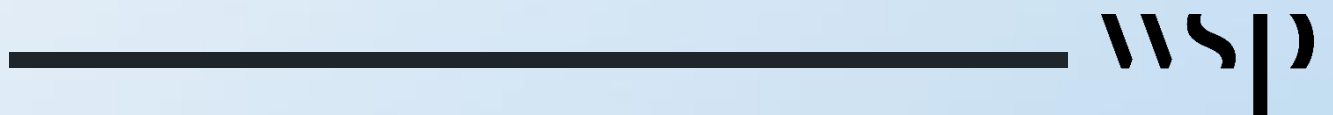




Table A-1 sets out the quality assurance checklist, taken from the Office of the Deputy Prime Minister’s Practical Guide to the Strategic Environmental Assessment Directive²⁶.

Table A-1 – Quality Assurance Checklist

Item	Where this has been addressed
<i>Objectives and Context</i>	
The plan’s purpose and objectives are made clear.	Section 2.3 of the Environmental Report sets out the plan’s vision and objectives.
Environmental issues and constraints, including international and environmental protection objectives, are considered in developing objectives and targets	Key sustainability issues have been identified through a review of relevant plans and programmes (see Appendix E, Section 4.2 and 4.4) and analysis of baseline conditions (see Appendix D). These have informed the development of the IIA Framework presented in Section 4.4.
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate	Section 4 sets out in detail how the IIA framework has been devised.

²⁶ Office of the Deputy Prime Minister’s Practical Guide to the Strategic Environmental Assessment Directive, 2005 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

Item	Where this has been addressed
Links with other related plans, programmes and policies are identified and explained.	A review of plans policies and programmes is set out in Appendix E.
Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.	Section 5 tests the compatibility of the IIA framework objectives against the Local Plan’s draft vision and objectives.
<i>Scoping</i>	
Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report	The statutory consultees were consulted on the Scoping Report between July and August 2023. Details of this have been provided in Section 4.1 and comments received are presented in Appendix C.
The assessment focuses on significant issues.	Key sustainability issues have been identified in the baseline analysis contained in Appendix D. Section 4.3 summarises the key sustainability issues identified.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit	Section 3.7 discusses the assumptions and limitations encountered.
Reasons are given for eliminating issues from further consideration.	No issues have been knowingly eliminated from the assessment at this stage.

Item	Where this has been addressed
Alternatives	
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.	Section 6.3 assesses the policy alternative, which for this reflected a 'do minimum scenario' – Application of the London Plan and a 'business as usual scenario' – Application of the existing Local Plan. Section 7.3 assess the alternative sites.
The environmental effects (both adverse and beneficial) of each alternative are identified and compared	Alternative policies and sites have both been assessed using the same criteria as the proposed policies and sites. A summary in Section 6.3 and 7.3 is provided that details their performance against the proposed allocations.
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained	Where possible, this has been highlighted within the assessment of policies and site alternatives and detailed in Sections 6.3 and 7.3.
Reasons are given for selection or elimination of alternatives.	A summary in Section 2.5, Section 6.3 and 7.3 is provided that details their performance against the proposed allocations.
Baseline Information	
Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.	Appendix D of this IIA Report presents the baseline analysis of the borough's social, economic and environmental characteristics including their likely evolution without the Local Plan.

Item	Where this has been addressed
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.	Section 3.7 sets out the criteria for assessing the spatial extent of effects. This has been further documented throughout the assessment in Appendix F and G.
Difficulties such as deficiencies in information or methods are explained.	Section 3.8 discusses the assumptions and limitations encountered.
<i>Prediction and evaluation of likely significant environmental effects</i>	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate	Sections 5 to 7 summarise the appraisal of the sustainability performance of the Local Plan. The Vision and Key objectives Policies and strategic sites are appraised. Detailed appraisal matrices are also provided at Appendix F (policies) and G (strategic sites and alternatives).
Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.	Positive and negative effects are considered within the appraisal matrices and within Sections 6 and 7. Potential effects are identified in the short, medium and long-term. The temporal scope for short-, medium- and long-term effects is defined in Section 3.7.

Item	Where this has been addressed
Likely secondary, cumulative and synergistic effects are identified where practicable.	The potential for cumulative and synergistic effects is considered in Section 9. These have also been highlighted within the assessment of policies (Appendix F) and sites (Appendix G)
Inter-relationships between effects are considered where practicable.	Inter-relationships between effects are identified in the assessment commentary, where appropriate. These have also been assessed as part of the Intra-project cumulative effects.
The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds	These have been detailed in Appendix B and identified where appropriate within the commentary for assessment.
Methods used to evaluate the effects are described.	These have been detailed in Section 3.7 and Appendix B
<i>Mitigation Measures</i>	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	These have been outlined in Section 10.
Issues to be taken into account in project consents are identified.	These have been outlined in Section 10.
<i>The Environmental Report</i>	

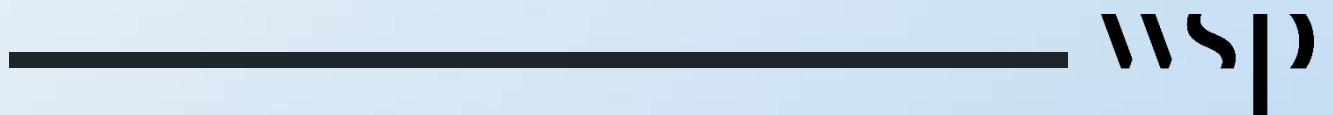
Item	Where this has been addressed
Is clear and concise in its layout and presentation	The IIA Report is clear and concise.
Uses simple, clear language and avoids or explains technical terms	Clear non-technical language has been used throughout.
Uses maps and other illustrations where appropriate.	Figure and tables have been used to present information where appropriate.
Explains the methodology used.	Methodology is set out in Section 3.7 and the thresholds for assessment are detailed in Appendix B – Scoring Criteria.
Explains who was consulted and what methods of consultation were used.	Section 2.2 sets out the work and consultation undertaken to date. The statutory consultees were consulted on the Scoping Report between July and August 2023. Details of this have been provided in Section 4.1 and comments received are presented in Appendix C. Limited responses were received from consultees for the Regulation 18 consultation.
Identifies sources of information, including expert judgement and matters of opinion	Section 3.7 and Appendix B identify sources of information used to inform the assessment.
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	A non-technical summary has been included separately.

Item	Where this has been addressed
<i>Consultation</i>	
The SEA is consulted on as an integral part of the plan-making process	The statutory consultees were consulted on the Scoping Report between July and August 2023. This IIA Report was consulted on alongside the draft Local Plan at Regulation 18 and will be consulted on again alongside the preferred Plan at Regulation 19.
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	This IIA Report was consulted on alongside the draft Local Plan and Regulation 18 and will be consulted on again as part of Regulation 19 consultation, alongside the preferred Local Plan. This will give opportunities for statutory consultees, stakeholders and members of the public to comment on the findings of the IIA.
<i>Decision-making and information on the decision</i>	
The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme	Responses received to this IIA Report to date have been set out in Appendix C.
An explanation is given of how they have been taken into account.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.

Item	Where this has been addressed
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.
<i>Monitoring measures</i>	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	Proposed monitoring measures are set out in Section 10.2. This details potential indicators and where possible are linked targets within the draft Local and London Plan.
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.
Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)	Proposed monitoring measures are set out in Section 10.2. These are proposed for those residual significant effects – in this case these are just uncertain effects.
Proposals are made for action in response to significant adverse effects.	

Appendix B

Assessment Criteria



This Appendix sets out the scoring criteria which has been applied to the assessment of both the policies and sites. Table B-1 sets out the overarching approach to dealing with uncertain, neutral and positive and negative effects and Table B-2 sets out the assessment thresholds for all other effects.

Table B-1 – Uncertain, Neutral and Positive/Negative Effects

Significance	Scoring Criteria
Uncertain (?)	Effects are currently uncertain as more information is needed that is not currently available or it may be dependent upon implementation.
Neutral (0)	Site/ Policy would neither help nor hinder the achievement of objectives, or there is no impact pathway.
Positive and Negative (+/-)	There are opportunities for both positive and negative effects that won't cancel each other out. Effects could be different for construction and operation. Like uncertain effects this may come down to implementation.

Table B-2 – Assessment Criteria

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Population and Equalities	IIA1: To build inclusive communities by reducing social exclusion, promoting equity, equality and respecting diversity.	Will the policy or proposal: <ul style="list-style-type: none"> Help to reduce inequalities, particularly for those people and communities most vulnerable? Improve access to services, facilities and transport for all inclusively? Support diversity? Support population growth? 	<ul style="list-style-type: none"> Population density IMD) Overall Deprivation Primary Schools Secondary Schools Higher Education Healthcare Provision (GP, dentists, pharmacies and hospitals) Children and Family Centres Community Centres Leisure Services Social Services 	Significant Positive (++)	<ul style="list-style-type: none"> The policy/ site will substantially reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. The site has existing good access to community facilities and services (predominantly G) It will ensure that the needs of all groups will be met both now and in the future. No issues identified within the EqIA.
				Minor Positive (+)	<ul style="list-style-type: none"> The policy/ site will actively reduce levels of inequalities. No new facilities are provided; however, existing facilities may be improved. It will ensure that the current needs of all groups are met. No issues identified within the EqIA, however, some recommendations/ refinements may need to be considered.
				Significant Negative (--)	<ul style="list-style-type: none"> The policy/ site will not be fully inclusive and excludes most minority groups. It will not be sufficient in meeting the needs of the local community both now and in the future and will result in a significant population growth without the facilities to support the new community. Some existing community facilities may be lost, with no further provision provided. Site may be located far away from existing community facilities and an area that is scored R for population density. No consideration has been given to the borough's changing demographic.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
					<ul style="list-style-type: none"> Substantial issues are identified within the EqIA, which are not mitigatable.
				Minor Negative (-)	<ul style="list-style-type: none"> The policy/ site will not be fully inclusive and excludes some minority groups. It will be sufficient in meeting the needs of the local community now, but not necessarily in the future. Some existing facilities are located nearby. Limited consideration has been given to the borough's changing demographic. Some issues are identified within the EqIA, which are mitigatable.
Human Health	IIA2: To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH's residents.	Will the policy or proposal: <ul style="list-style-type: none"> Promote healthier lifestyles? Increase walking and cycling? Improve quality, quantity and equality of access to green and blue space and increase opportunities for recreation? Promote health enhancing environments, behaviours and activities for local communities? Reduce inequalities? Increase inclusion and reduce loneliness? Help prevent risks to human health, which arise from noise and air pollution? Support the UK's levelling up agenda? Reduce the pressure of the rising cost of living? Increase exposure to noise and air pollution? 	<ul style="list-style-type: none"> IMD Health Deprivation Life expectancy (males and females) Primary Schools Secondary Schools Higher Education Healthcare Provision (GP, dentists, pharmacies and hospitals) Children and Family Centres Community Centres Allotments Leisure Services Social Services Sports Facilities Areas Deficient in Nature 	++	<ul style="list-style-type: none"> The policy/ site will substantially reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future. No issues identified within the HIA.
				+	<ul style="list-style-type: none"> The policy/ site will actively reduce levels of health inequalities. No new facilities are provided; however, existing facilities may be improved. It will ensure that the current needs of all groups are met. No issues identified within the HIA, however, some recommendations/ refinements may need to be considered.
				--	<ul style="list-style-type: none"> The policy/ site will not be sufficient in meeting the health and wellbeing needs of the local community both now and in the future. It will result in a significant population growth without the facilities to support the new community. Site is located in an area of high loneliness and lacks access to or consideration of new facilities and services. Site is located in an area with high noise and air pollution. Some existing community facilities may be lost, with no further provision provided. Site may be located far away from existing community facilities. No consideration has been given to the borough's changing demographic. Substantial issues are identified within the HIA, which aren't mitigatable.
				-	<ul style="list-style-type: none"> The policy/ site will be sufficient in meeting the needs of the local community now, but not necessarily in the future. Some existing facilities are located nearby. Limited consideration has been given to the borough's changing demographic. Some issues are identified within the HIA, which are mitigatable.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Economy and Employment	IIA3: To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets' town centre and other district and local centres.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Improved connectivity between business clusters and housing markets? ■ Help support changing retail patterns? ■ Increase retail floorspace? ■ Increase footfall and local spending from commuters, residents and tourists? 	<ul style="list-style-type: none"> ■ Central Activities Zone ■ Tower Hamlets Activity Zone ■ Primary Shopping Areas ■ Neighbourhood Parades ■ Primary Shopping Areas ■ Town Centres (major, district and neighbourhood) 	++	<ul style="list-style-type: none"> ■ The policy/ site will improve and enhance connectivity between business clusters and the housing market. ■ The policy/ site will include proposals that will improve town centre viability and support changing retail patterns. ■ The policy/ site will provide new opportunities for a variety of different markets e.g., tourism, arts, entertainment and recreation etc.
				+	<ul style="list-style-type: none"> ■ The policy/ site will improve connectivity between business clusters and the housing market. ■ The policy/ site will include proposals that will support minor town centre improvements.
				--	<ul style="list-style-type: none"> ■ The policy/ site will decrease the connectivity between business clusters and the housing market. ■ The site/policy would result in the decline of town and local centres. ■ The policy/ site won't provide opportunities for a variety of different markets.
				-	<ul style="list-style-type: none"> ■ The policy/ site will indirectly decrease the connectivity between business clusters and the housing market. ■ The site/policy would indirectly result in the decline of town and local centres.
	IIA4: To ensure that residents have employment opportunities and access to training.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Increase job availability? ■ Improve access to employment centres? ■ Support flexible working patterns? ■ Meet the skills needs and future demand for labour? ■ Diversify the labour market? 	<ul style="list-style-type: none"> ■ IMD Employment (LSOA) ■ IMD Income (LSOA) ■ Local Industrial Location ■ Strategic Industrial locations ■ Employment sites ■ Local Employment Location ■ Higher Education 	++	<ul style="list-style-type: none"> ■ Implementation of policy will result in a significant increase in the number and diversity of jobs. ■ Site is well located to existing employment areas, and it will include some mixed used development which will provide additional employment opportunities.
				+	<ul style="list-style-type: none"> ■ Implementation of policy could indirectly result in an increase in employment opportunities. ■ Site is well located to existing employment areas which will provide additional employment opportunities.
				--	<ul style="list-style-type: none"> ■ The site/policy would result in substantial loss in job opportunities. For sites this could mean the loss of employment land for development without further employment provision being made. ■ Site is located away from other employment areas, with no employment provision made. ■ Result in the stagnation of the labour market.
				-	<ul style="list-style-type: none"> ■ The site/policy would result in some loss in job and training opportunities. ■ For sites this could mean a loss in some employment land for development with some additional employment with some additional employment opportunities being offered as part of the new development. ■ Site is located in close proximity to other employment areas.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Housing	IIA5: To meet the housing needs of all of the borough's residents inclusively.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Help to sufficiently meet the borough's housing target? ■ Increase affordability? ■ Optimise proposed sites to maximise housing delivery? ■ Reduce housing deprivation? ■ Meet the needs of all groups inclusively (elderly residents, young families, disabled, ethnic minorities etc.)? ■ Support those with protected characteristics (e.g., the gypsy and traveller community)? ■ Increase the quality of existing housing stock? ■ Reduce overcrowding? 	<ul style="list-style-type: none"> ■ IMD Barriers to housing (LSOA) ■ House Prices (wards) 	++	<ul style="list-style-type: none"> ■ Policy/ site will help to meet the borough's housing target. ■ Housing will be meet the needs of all groups inclusively, both now and in the future. ■ Exceeds the NPPF affordability target of at least 10% of the total number of homes at major housing sites²⁷ ■ The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families and travellers. ■ Policy/site will provide significant improvements to the quality of existing housing stock.
				+	<ul style="list-style-type: none"> ■ Policy/ site will help to work towards meeting the borough's housing target. ■ Meets the NPPF affordability target of at least 10% of the total number of homes at major housing sites. ■ The size, type and tenure of housing takes into account different groups in the community. ■ Policy/site will provide some minor improvements to the quality of existing housing stock.
				--	<ul style="list-style-type: none"> ■ Policy/ site will fall significantly short of the borough's housing target. ■ No consideration for affordable housing and site is scored R for house prices. ■ The size, type and tenure of housing doesn't take into account different groups.
				-	<ul style="list-style-type: none"> ■ Policy/ site will fall short of meeting the borough's housing target. ■ Limited consideration for affordable housing. ■ Some consideration for size, type and tenure of housing has been made but it doesn't take into account all groups inclusively.
Crime and Safety	IIA6: To reduce crime and the fear of crime for all residents inclusively	Will the policy or proposal: <ul style="list-style-type: none"> ■ Improve safety? ■ Ensure that residents feel safe, particularly after dark? ■ Support designing out crime principals? 	<ul style="list-style-type: none"> ■ IMD Crime (LSOA) ■ Crime Rate (Ward) 	++	<ul style="list-style-type: none"> ■ Policy/ site includes designing out crime principles and measures that will significantly improve levels of safety for all residents, including the safety of women and girls. ■ Policy/ site includes measures that will improve road safety and will actively help to reduce the number of people KSI on the roads.
				+	<ul style="list-style-type: none"> ■ Policy/ site includes measures that will indirectly improve levels of safety e.g., public realm improvements. ■ Policy/ site includes measures that will improve road safety and will indirectly help to reduce the number of people KSI on the roads.

²⁷ Major is defined as 10 or more homes or a site that has an area of 0.5 hectares or more

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		<ul style="list-style-type: none"> ■ Reduce levels of crime derivation? ■ Improve road safety and reduce the number of people KSI on the roads, particularly children from deprived backgrounds? ■ Create spaces where women and girls feel safe and included? 		--	<ul style="list-style-type: none"> ■ Site may be located in an `area with high levels of crime rates and crime deprivation (R) with no plans for designing out crime principles. ■ Policy/ site includes makes no consideration to improve road safety and reduce the number of people KSI on the roads.
				-	<ul style="list-style-type: none"> ■ Site may be located in an area with high levels of crime rates and crime deprivation with minimal plans for designing out crime principles. ■ Policy/ site includes makes limited consideration to improve road safety and reduce the number of people KSI on the roads.
Transport and Accessibility	IIA7: To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Support the use of sustainable transport modes? ■ Reduce demand for use of the private car and facilitate a modal shift to more sustainable modes? ■ Support EV infrastructure? 	<ul style="list-style-type: none"> ■ Public Transport Accessibility Levels (PTAL) ■ Bus Stops ■ National Rail Train Station/ Tube Station ■ National Cycle Network ■ London Cycle Network ■ Cycle Hire Station ■ Cycle Superhighway ■ EV Charge Point 	++	<ul style="list-style-type: none"> ■ Site is located within an area with existing good access to public transport (G for PTAL) and further provision is made as part of the development. ■ Policy supports the development of sustainable transport modes contributing to a significant modal shift.
				+	<ul style="list-style-type: none"> ■ Site is located in an area with existing good access to public transport (G for PTAL), but limited provision of new sustainable transport is made to support future population growth. ■ Site is well located to local facilities and services allowing residents to live their lives more locally. ■ Policy may indirectly contribute to a modal shift.
				--	<ul style="list-style-type: none"> ■ Site has poor access to public transport (R for PTAL) and no further provision is made as part of the new development. ■ Site is poorly located to local facilities and services and will increase the need to travel by car. ■ Policy will directly contribute to an increase demand for private vehicle use
				-	<ul style="list-style-type: none"> ■ Site has average access to public transport (A for PTAL), but limited provision of new sustainable transport is made to support future population growth. ■ Site has some local facilities within walking distance, however, not all needs will be met and there may be some increased need to travel. ■ Policy may indirectly contribute to an increase demand for private vehicle use.
	IIA8: To protect and enhance access to essential services and facilities for all residents.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Improve access to services, facilities and transport? ■ Ensure that all groups can access services 	<ul style="list-style-type: none"> ■ Public Transport Accessibility Levels (PTAL) ■ Bus Stops ■ National Rail Train Station/ Tube Station ■ Primary Schools ■ Secondary Schools 	++	<ul style="list-style-type: none"> ■ Site is located within an area with existing good access to services and facilities (predominantly scored G) ■ Services are easily accessed by all groups inclusively. ■ Site/ Policy supports the development of further facilities and services to meet the needs of the population both now and in the future. ■ Policy/ site fulfils the requirements of the Healthy Streets Indicators
				+	<ul style="list-style-type: none"> ■ Site is well located to local facilities and services allowing residents to live their lives more locally.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		and facilities inclusively? ■ Incorporate a 'Healthy Streets' approach? ²⁸	<ul style="list-style-type: none"> ■ Higher Education ■ Healthcare Provision ■ Children and Family Centres ■ Community Centres ■ Leisure Services ■ Social Services ■ Sports Facilities ■ Primary Shopping Areas ■ Neighbourhood Parades ■ Primary Shopping Areas ■ Town Centres (major, district and neighbourhood) 	<div style="background-color: #90EE90; width: 100%; height: 20px; margin-bottom: 2px;"></div> <div style="background-color: #FF0000; width: 100%; height: 20px; margin-bottom: 2px;"></div> <div style="background-color: #FFD700; width: 100%; height: 20px;"></div>	<ul style="list-style-type: none"> ■ Site/ policies do not propose any new facilities; however, existing facilities may be improved. ■ Policy/ site fulfils some of the requirements of the Healthy Streets Indicators <ul style="list-style-type: none"> ■ Site is located within an area with poor access to services and facilities (predominantly scored R) ■ Site/ policies do not propose any new facilities or services and will not meet the needs of the population both now and in the future. ■ Some groups may be excluded. ■ Policy/ site works against the Healthy Streets Indicators <ul style="list-style-type: none"> ■ Site has average access to facilities and services (A for PTAL), but limited provision of new facilities is made to support future population growth. ■ Site/ policies do propose some new facilities/ services or some upgrades to existing facilities/ services, however, these may not meet the needs of all groups inclusively.
Biodiversity and Natural Capital	IIA9: To protect and enhance protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Cause damage to locally and nationally designated sites through infrastructure provision, increased development, recreational pressures, traffic or maintenance? ■ Maintain and enhance biodiversity in the borough? ■ Seek opportunities for biodiversity for at least 10% net gain? ■ Increase provision of ecosystem services 	<ul style="list-style-type: none"> ■ LNR ■ NNR ■ Priority Habitat ■ SINC ■ SAC ■ SSSI ■ SPA ■ Green Grid Network 	++	<ul style="list-style-type: none"> ■ Site/ policy will maintain, protect and enhance protected habitats, species and valuable ecological networks. ■ Site/ policy will achieve >10% BNG ■ Support and enhance habitat connectivity ■ Site is located away from any national/ local designations (predominantly G) ■ HRA doesn't identify any potential likely significant effects . ■ Site will contribute to the Green Grid Network.
				+	<ul style="list-style-type: none"> ■ Site/ policy will maintain protected habitats, species and valuable ecological networks. ■ Site/ policy will achieve 10% BNG ■ Site is located away from any national/ local designations (a mix of G with some A) ■ HRA doesn't identify any potential likely significant effects.
				--	<ul style="list-style-type: none"> ■ Site/ policy will result in the fragmentation of habitats and species and deterioration of designated sites. ■ Site/ policy will result in a significant net loss of biodiversity (>10%) ■ Site is located within an NNR, SAC, SSSI and/ or SPA. ■ Site is located within a SINC or LNR and no contribution is made to biodiversity net gain.

²⁸ Transport for London, Healthy Streets for London, [online] available at: <https://content.tfl.gov.uk/healthy-streets-for-london.pdf>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		<p>from the borough's natural capital?</p> <ul style="list-style-type: none"> Prevent fragmentation of habitats and promote ecological networks? Result in developments which will improve biodiversity on site? 		<div style="background-color: red; height: 20px; width: 100%;"></div>	<ul style="list-style-type: none"> HRA identifies likely significant effects. Severe the Green Grid Network
				<div style="background-color: yellow; height: 20px; width: 100%; text-align: center;">-</div>	<ul style="list-style-type: none"> Site/ policy will result in the fragmentation of habitats and species and deterioration of designated sites. Site/ policy will result in a net loss of biodiversity (<10%) Site is located within close proximity to NNR, SAC, SSSI and/ or SPA. Site is located within SINC or LNR but site will contribute to BNG. There may be some temporary short-term negative effects on biodiversity as a result of construction activities.
Landscape and Townscape	IIA10: To protect and enhance the borough's townscapes and landscapes.	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> Respect, maintain and strengthen local character and distinctiveness? Achieve high quality sustainable design for buildings, spaces and the public realm? Improve the quality and condition of the townscape and landscape? Improve the quality of parks and open spaces? Incorporate green and blue infrastructure into design? 	<ul style="list-style-type: none"> Borough Designated Views London View Management Framework Tall Building Zone Strategically Important Skyline London Squares Local Open Space Metropolitan Open Land Green Grid Network 	<div style="background-color: green; height: 20px; width: 100%; text-align: center;">++</div>	<ul style="list-style-type: none"> The site/ policy will respect, maintain, and strengthen local character and distinctiveness. The site/ policy will ensure high quality design which is sympathetic to the local townscape and landscape. The site will incorporate green and blue infrastructure as part of design. The site/ policy will increase, protect and enhance the public realm, parks and open spaces.
				<div style="background-color: lightgreen; height: 20px; width: 100%; text-align: center;">+</div>	<ul style="list-style-type: none"> The site/ policy will ensure high quality design which is sympathetic to the local townscape and landscape. The site will incorporate green and blue infrastructure as part of design.
				<div style="background-color: red; height: 20px; width: 100%; text-align: center;">--</div>	<ul style="list-style-type: none"> The site/ policy will result in unsympathetic design which will deteriorate the local landscape and townscape (including tall building zones, strategically important skyline and designated views). The site/ policy will result in tall buildings outside of the Tall Building Zone. The site/ policy will result in the loss of parks and open spaces and public realm, without any additional provision provided.
				<div style="background-color: yellow; height: 20px; width: 100%; text-align: center;">-</div>	<ul style="list-style-type: none"> There may be some temporary short-term negative effects on the local landscape and townscape as a result of construction activities. The site/ policy will result in the loss of parks and open spaces and public realm, but additional provision will be provided as part of design.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Historic Environment	IIA11: To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.	Will the policy or proposal: <ul style="list-style-type: none"> Conserve and/or enhance heritage assets, their setting and the wider historic environment? Contribute to the better management of heritage assets and contribute to conserving heritage at risk? Improve the quality and condition of the historic environment? Respect, maintain and strengthen local character and distinctiveness? 	<ul style="list-style-type: none"> Listed Buildings Registered Parks and Gardens Scheduled Monuments Heritage at risk Conservation areas Archaeological Priority Area 	++	<ul style="list-style-type: none"> The policy/ site will result in enhancements to designated and non-designated heritage assets and/or their setting, fully taking into consideration the significance and value of the asset. Local character will be respected and enhanced.
				+	<ul style="list-style-type: none"> The policy/ site will result in enhancements to designated and non-designated heritage assets and/or their setting. Local character will be respected and maintained.
				--	<ul style="list-style-type: none"> The policy/ site would diminish the significance of designated heritage assets and/or their setting. There would be major damage to designated and non-designated heritage assets (including buried archaeological sites/remains). The site is located within a conservation area and makes no consideration to sympathetic design.
				-	<ul style="list-style-type: none"> The policy/ site will result in the loss of significance of undesignated heritage assets. The setting of heritage assets is likely to be short term and temporary.
Water Environment	IIA12: To reduce the risk and vulnerability to flooding.	Will the policy or proposal: <ul style="list-style-type: none"> Reduce the risk of flooding? Result in urban creep? Increase surface runoff? 	<ul style="list-style-type: none"> Flood Zone Flood Risk Area Critical drainage area 	++	<ul style="list-style-type: none"> The policy/ site would result in a significant reduction to flood risk. Design incorporates SuDs, nature-based solutions and other flood alleviation measures.
				+	<ul style="list-style-type: none"> The policy/ site would indirectly result in an improvement to flood risk.
				--	<ul style="list-style-type: none"> The site is located within a flood zone 3. Site is located within a critical drainage area. No measures have been put in place to mitigate and alleviate flood risk Site/ policy will encourage urban creep
				-	<ul style="list-style-type: none"> The site is located in a flood zone 2. Site is located within a critical drainage area Some measures have been put in place to mitigate flood risk.
	IIA13: To maintain and enhance water quality.	Will the policy or proposal: <ul style="list-style-type: none"> Support the protection and enhancement of water bodies? Result in the reduction of water quality? 	<ul style="list-style-type: none"> Statutory Main River Water Spaces 	++	<ul style="list-style-type: none"> The policy/ site would make a significant improvement in surface water quality and/ or in groundwater quality. Water spaces will be improved and enhanced.
				+	<ul style="list-style-type: none"> The policy/ site would contribute to a minor or indirect improvement in surface water quality or in groundwater quality.
				--	<ul style="list-style-type: none"> The policy/ site would have a major effect on fluvial and groundwater quality and lead to long term or continuous effects on receptors (e.g., designated habitats, or recreational users) that cannot reasonably be mitigated.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
					<ul style="list-style-type: none"> Site is located <16m away from a water course
				-	<ul style="list-style-type: none"> The policy/ site would have a minor effect on fluvial and ground water quality and lead to short term or intermittent effects on receptors (e.g., protected species or recreational users). Site is located <50m away from a water course. These effects are likely to be short term and are unlikely to be avoided but could be mitigated.
Air Quality	IIA14: To protect and enhance air quality.	Will the policy or proposal: <ul style="list-style-type: none"> Support measures to reduce levels of air pollution? Help to improve air quality? Support measures for the reduction of congestion and traffic levels particularly in AQMAs and congestion hot-spots? 	<ul style="list-style-type: none"> NO₂ PM₁₀ Motor Vehicle restricted area Air Quality Focus Areas 	++	<ul style="list-style-type: none"> The policy/ site would result in a major enhancement of the air quality. The policy/ site would substantially reduce levels of traffic and congestion.
				+	<ul style="list-style-type: none"> The policy/ site would indirectly result in the enhancement of air quality. The policy/ site would indirectly reduce levels of traffic and congestion.
				--	<ul style="list-style-type: none"> The policy/ site would result in a major decrease in the air quality. The policy/ site would substantially increase levels of traffic and congestion.
				-	<ul style="list-style-type: none"> The policy/ site would indirectly result in a decrease of the air quality. The policy/ site would indirectly increase levels of traffic and congestion.
Climate Change and Greenhouse Gases	IIA15: Ensure that Tower Hamlets is resilient to the effects of climate change.	Will the policy or proposal: <ul style="list-style-type: none"> Contribute further to the urban heat island effect? Ensure new development is designed to mitigate overheating risk? Increase the resilience of infrastructure and material assets to the impacts of climate change (including flood 	<ul style="list-style-type: none"> Overall Climate Risk Overall Heat Risk Flood Zone Flood Risk Area 	++	<ul style="list-style-type: none"> The policy/site would have a major positive effect on increasing the resilience/ decreasing the vulnerability to climate change effects.
				+	<ul style="list-style-type: none"> The policy/site would have a minor positive effect on increasing the resilience/ decreasing the vulnerability to climate change effects.
				--	<ul style="list-style-type: none"> The policy/site would have a major negative effect on resilience/ significantly decrease vulnerability to climate change effects. The site is located within a combination of the following: overall climate risk, overall heat risk, flood zone 3 and/or flood risk area.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		risk, extreme weather, heat and cold)?		-	<ul style="list-style-type: none"> The policy/ site would not increase resilience/decrease vulnerability to climate change effects; however, the site isn't currently vulnerable to the effects of climate change.
	IIA16: To reduce greenhouse gas emissions, support national and local decarbonisation initiatives and encourage energy efficiency.	Will the policy or proposal: <ul style="list-style-type: none"> Support low carbon and energy efficient design? Contribute to reducing emissions as per the Paris Agreement? Support the borough's Net Zero ambitions by 2045? Increase renewable energy generation? Support low carbon, energy efficient design? Reduce levels of embodied carbon? 	<ul style="list-style-type: none"> NO₂ PM₁₀ Motor Vehicle restricted area 	++	<ul style="list-style-type: none"> The policy/ site will support opportunities for renewable energy production. The policy/ site will reduce GHG emissions and provide new infrastructure/assets that maximise the use of renewable energy sources. The option would provide opportunities for significant carbon sequestration
				+	<ul style="list-style-type: none"> The policy/ site will support opportunities for renewable energy production. The policy/ site will reduce GHG emissions. The option would provide opportunities for carbon sequestration
				--	<ul style="list-style-type: none"> The policy/ site results in a major increase in energy consumption with no renewable energy options. The construction/operation of the site would involve a significant amount of embodied carbon. The option would result in major or long-term increases in operational GHGs
				-	<ul style="list-style-type: none"> The policy/ site results in a minor increase in energy consumption with no renewable energy options. The policy/ site would result in a minor increase in GHGs emissions; however, this would be temporary.
				++	<ul style="list-style-type: none"> The policy/ site will re-purpose existing infrastructure and re-use or recycle substantial quantities of waste materials.
Material Assets (including Soil Resources)	IIA17: To reduce the amount of waste produced and minimise the amount sent to landfill	Will the policy or proposal: <ul style="list-style-type: none"> Minimise the amount of waste? Support the waste hierarchy? Support the use of sustainable materials? 	<ul style="list-style-type: none"> Waste management sites Safeguarded Wharves 	++	<ul style="list-style-type: none"> The policy/ site will re-use or recycle moderate quantities of waste materials.
				+	<ul style="list-style-type: none"> The policy/ site will require significant new infrastructure that cannot be provided through the re-use or recycling of waste materials.
				--	<ul style="list-style-type: none"> The policy/ site will require new infrastructure with only limited opportunities for the re-use or recycling of waste materials.
				-	<ul style="list-style-type: none"> The policy/ site will require new infrastructure with only limited opportunities for the re-use or recycling of waste materials.
				++	<ul style="list-style-type: none"> The policy/ site is located on a brownfield site and has no effect on soils or existing land use.
		Will the policy or proposal:	<ul style="list-style-type: none"> Brownfield Land 	++	<ul style="list-style-type: none"> The policy/ site is located on a brownfield site and has no effect on soils or existing land use.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
	IIA18: To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.	<ul style="list-style-type: none"> Support the use of brownfield land? Seek to use sustainable construction methods and materials? Support the use of sustainable materials? Use locally sourced materials? 		<div style="background-color: green; width: 20px; height: 20px; margin-bottom: 5px;"></div> <div style="background-color: #90EE90; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">+</div> <div style="background-color: red; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">--</div> <div style="background-color: yellow; width: 20px; height: 20px; text-align: center; line-height: 20px;">-</div>	<ul style="list-style-type: none"> Any new infrastructure will incorporate substantial sustainable design measures and materials. The policy/ site is predominantly located on a brownfield site and has no effect on soils or existing land use. Any new infrastructure will incorporate some sustainable design measures and materials. The policy/ site will result in a major loss in greenfield land or is in substantial conflict with existing land use. There are no opportunities for sustainable design or the use of sustainable materials The policy/ site will result in some loss in greenfield land or is in conflict with existing land use. There are limited opportunities for sustainable design or the use of sustainable materials.

Table B-3 sets out the criteria used for each of the indicators used for the RAG assessment.

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
IIA1: Population and Equalities	Population density (Ward)	Higher than the borough average (15,695p/h)	Higher than the London but lower than the borough average	Lower than the London average (5,598p/h)	
	IMD Overall deprivation (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	
	Primary Schools	>3.2km	<3.2km	<1km	Department for Education (DfE), Home to School Transport and Travel Guidance, 2014 ²⁹
	Secondary Schools	>4.8km	<4.8km	<1 km	DfE Home to School Transport and Travel Guidance, 2014
	Higher Education	>4.8km	<4.8km	<1 km	DfE Home to School Transport and Travel Guidance, 2014

²⁹ Department for Education (DfE), Travel to school for children of compulsory school age Statutory guidance for local authorities, 2014 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1165730/Travel_to_school_for_children_of_compulsory_school_age.pdf

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
IIA2: Health and Wellbeing	IMD Health (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	Life Expectancy - Female (Ward)	Worse than the national average (<81.7)	Similar to the national average (81.7-84.1)	Higher than the national average (84.1-87.9)	Professional judgement
	Life Expectancy - Male (Ward)	Worse than the national average (<77.9)	Similar to the national average (77.91-80.2)	Higher than the national average (80.21-84.7)	Professional judgement
	Healthcare (GPs, dentists, pharmacies, hospitals)	>800m		<800m	Chartered Institution of Highways & Transportation (CIHT) - Planning for Walking, 2015 ³⁰
	Allotments		>800m	<800m	CIHT - Planning for Walking, 2015
	Children and family Centres	>800m		<800m	CIHT - Planning for Walking, 2015
	Community Centres	>800m		<800m	CIHT - Planning for Walking, 2015
	Leisure services	>800m		<800m	CIHT - Planning for Walking, 2015
	Social services	>800m		<800m	CIHT - Planning for Walking, 2015
	Parks and open spaces	>800m		<800m	CIHT - Planning for Walking, 2015
	Sports facilities	>800m		<800m	CIHT - Planning for Walking, 2015
	Areas deficient in nature	Within		Outside	Professional Judgement
IIA3/4: Economy and Employment	IMD Employment (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	IMD Income (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	Central Activities Zone		Outside	Within/intersect	Professional judgement
	Tower Hamlets Activity Areas		Outside	Within/intersect	Professional judgement
	Local Industrial Location	>800m		<800m	CIHT - Planning for Walking, 2015
	Strategic Industrial locations	>800m		<800m	CIHT - Planning for Walking, 2015
	Employment sites	>800m		<800m	CIHT - Planning for Walking, 2015
	Local Employment Location	>800m		<800m	CIHT - Planning for Walking, 2015

³⁰ Chartered Institution of Highways & Transportation, Planning For Walking, 2015 [online] available at: https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	Primary Shopping Areas	>800m		<800m	CIHT - Planning for Walking, 2015
	Neighbourhood Parade	>800m		<800m	CIHT - Planning for Walking, 2015
	Primary Shopping Areas	>800m		<800m	CIHT - Planning for Walking, 2015
	Town Centres (major, district and neighbourhood)	>800m		<800m	CIHT - Planning for Walking, 2015
IIA5: Housing	IMD Barriers to housing (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	House Prices (wards)	Exceeds London Average	Exceeds national average but below London Average	In line with England Average	Professional judgement
IIA6: Crime and Safety	IMD Crime (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional Judgement
	Crime Rate (Ward)	Worse than the borough average (>127.5 per 1,000)	Higher than the London but lower than the Borough average	Lower than the London average (<95 per 1,000)	Professional Judgement
IIA7/8: Transport and Accessibility	PTAL	0, 1a, 1b,	2, 3, 4	5, 6a, 6b	TfL - Assessing transport connectivity in London
	Bus Stops	>400m	200-400m	<200m	CIHT - Planning for Walking, 2015
	Train Station	>800m		<800m	CIHT - Planning for Walking, 2015
	Tube Station	>800m		<800m	CIHT - Planning for Walking, 2015
	National Cycle Network	Site is not connected to national cycle network		Site is connected to national cycle network	Professional judgement
	London Cycle Network	Site is not connected to London Cycle network		Site is connected to London Cycle network	Professional judgement
	Cycle Hire Station	>400m	200-400m	<200m	Professional judgement
	Cycle Superhighway	Site is not connected to cycle superhighway		Site is connected to cycle superhighway	Professional judgement
IIA9: Biodiversity and Natural Capital	EV Charge Point		>200m	<200m	Professional judgement
	Local Nature Reserve	<0.01 km	< 0.8km	>0.8km	Professional judgement
	National Nature Reserve	<0.01 km	< 0.8km	>0.8km	Professional judgement
	Priority Habitat Inventory	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SiNC	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SAC	<0.01 km	< 0.8km	>0.8km	Professional judgement

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	SSSI	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SPA	<0.01 km	< 0.8km	>0.8km	Professional judgement
IIA10: Landscape and Townscape	Borough Designated Views	Within/adjacent		Outside	Professional judgement
	London View Management Framework	Within/adjacent		Outside	Professional judgement
	Tall Building Zone	Within Zone		Outside	Professional judgement
	Strategically Important Skyline	Within/adjacent		Outside	Professional judgement
	London Squares	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	Professional judgement
	Local Open Space	Within/adjacent		Outside	Professional judgement
	Metropolitan Open Land	Within/adjacent		Outside	Professional judgement
	Green Grid	Within/adjacent		Outside	Professional judgement
IIA11: Historic Environment	Listed Buildings	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	Historic England (HE) 'The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 3' ³¹
	Registered Parks and Gardens	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Scheduled Monuments	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Heritage at risk	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Conservation areas	Within/adjacent		Outside	HE Advice Note 3
	Archaeological Priority Area	Within/adjacent		Outside	HE Advice Note 3
IIA12: Flood Risk	Flood Zone	Flood Zone 3	Flood Zone 2	Flood Zone 1	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3 ³²

³¹ Historic England, 'The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 3 [online] available at: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

³² Defra, Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3, 2017 [online] available at: <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3>

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	Flood Risk Area		Yes	No	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
IIA13: Water Quality	Statutory Main River	<16m	<50m	>50m	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
	Water Spaces	<16m	<50m	>50m	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
	Critical drainage area		>15% of the site is within CDA	<15% of the site is within a CDA	Professional judgement
IIA14: Air Quality/ IIA16: Greenhouse Gases	NO ₂	>43µ/m ³	>28-43µ/m ³	<16 - 28µ/m ³	Professional judgement
	PM ₁₀	>43µ/m ³	>28-43µ/m ³	<16 - 28µ/m ³	Professional judgement
	Motor Vehicle restricted area		Outside	Within/intersect	Professional judgement
	Air Quality Focus Areas	Within		Outside	Professional judgement
IIA15: Climate Resilience	Overall Climate Risk	High	Medium & Medium-High	Low & Low-Medium	Greater London Authority's (GLA) Climate Risk Mapping Methodology ³³
	Overall Heat Risk	High	Medium	Low	GLA Climate Risk Mapping Methodology
IIA17: Waste	Waste management sites	Within/adjacent		Outside	Professional judgement
	Safeguarded Wharves	Within/adjacent		Outside	Professional judgement
IIA18: Efficient use of resources	Brownfield land	No	Part	Yes	Professional judgement

³³ Greater London Authority, Climate Risk Mapping, 2022 [online] available at: https://data.london.gov.uk/dataset/climate-risk-mapping?_gl=1%2a1bed0y2%2a_ga%2aMTQ1MjkzNzM5LjE2OTA5ODA3NDI.%2a_ga_PY4SWZN1RJ%2aMTY5NDAxNzUxOC4xMC4wLjE2OTQwMTc1MTguNjAuMC4w

Appendix C

Consultation Comments

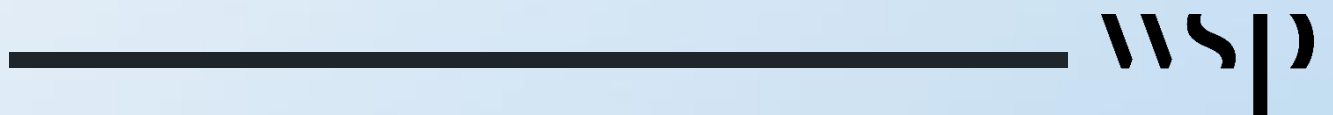


Table C-1 below sets out the consultation comments received from the Statutory consultees on the IIA Scoping Report. The table sets out how and where these comments have been addressed. No specific comment on the IIA were received from the Regulation 18 consultation.

Table C-1 –Consultation Comments

ID	Consultee	Comment	Response
1	Natural England	Natural England have no comments to make on this consultation.	Noted – no response required
2	Historic England	In terms of the historic environment, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the Local Plan, that it has established an appropriate Baseline against which to assess the Plan’s proposals and that it has put forward a suitable set of Objectives and Indicators. Overall, therefore, we believe that it provides the basis for the development of an appropriate framework for assessing the significant effects which this plan might have upon the historic environment.	Noted – no response required
3	Historic England	<p>Historic England strongly advises that the conservation team of your authority and your archaeological advisors are closely involved throughout the preparation of the SA of this Plan.</p> <p>They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse</p>	The team will continue to engage and consult with Historic England throughout the IIA/ Local Plan process.

ID	Consultee	Comment	Response
		<p>impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment.</p>	
4	Historic England	<p>Table 4-1 Key Messages - Policy D9 of the London Plan 2021 is clear that in assessing and identifying appropriate locations for tall buildings, local plans should ensure that they avoid adverse impacts on the historic environment.</p>	<p>Table 4-1 in the IIA Report has been amended to the following “Ensure tall buildings are designed acceptably and situated in appropriate areas that avoid adverse impacts on heritage assets; ...’</p>
5	Historic England	<p>Table 4-1 Key Messages - A number of policies in the London Plan 2021 (notably D3 Optimising Site Capacity through the design-led approach and HC1 Heritage conservation and growth) also indicate that an understanding of heritage significance should be used to help inform and shape the design of new development to respond to context.</p>	<p>Table 4-1 in the Interim IIA Report has been amended to the following</p> <p>Addition of an extra bullet point which states</p> <p>‘Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to its context’</p> <p>Added at end of final existing bullet point</p> <p>‘ .. and positive place-shaping, including through using heritage assets as visitor attractions and the provision of visitor infrastructure.’</p>

ID	Consultee	Comment	Response
6	Historic England	Table 5-11 Issues and opportunities for the historic environment - See comments above in relation to London Plan policies D3 and HC1	Table D-11 and Table 4-1 in the IIA Interim report have been updated to include the following additional bullet - The NLP should ensure that the local historic environment (including the archaeological resource) informs design proposals, public realm and landscaping schemes to help ensure that heritage assets and their settings are enhanced.
7	Historic England	Table 6-1 IIA Appraisal Framework - Climate change is acknowledged as a risk for the historic environment earlier in the document. It should be made explicit here that well-intentioned but inappropriate interventions on historic buildings should be avoided.	Table D-11 and Table 4-1 in the IIA Interim report have been updated to include the following additional bullet - Climate change is acknowledged as a risk for the historic environment earlier in the document. It should be made explicit here that well-intentioned but inappropriate interventions on historic buildings should be avoided.
8	Historic England	Table A9 – Add Historic England Advice Note 4 (March 2022) Tall Buildings and London Borough of Tower Hamlets conservation area appraisals	Both documents have been added to Table E9 in the Interim IIA Report
9	Environment Agency	Table 4-1 Key Messages – Biodiversity and Natural Capital – Support inclusion of the important role of habitat connectivity. Suggest including wording in relation to Biodiversity Net Gain (BNG) to explain how	Table 4-1 in the IIA Interim Report has been updated to include the following Added within the first existing bullet point

ID	Consultee	Comment	Response
		developments must ensure appropriate habitat is created.	<p>‘...along with the important role habitat connectivity plays in building strong green and blue networks that protect and enhance biodiversity and natural capital...’</p> <p>Added at the end of the final existing bullet point</p> <p>‘...Developments must ensure appropriate habitat is created that will be of importance to habitat connectivity, provide ecologically enhanced green and blue spaces, and incorporate long-term management plans.’</p>
10	Environment Agency	Table 4-1 Key Messages – Material Assets – Note that whilst protecting groundwater quality has been considered, the need to protect groundwater quantity should also be addressed.	<p>Table 4-1 in the IIA Interim Report has been updated to include the following</p> <p>Addition of an extra bullet point (note: within Water Environment not Material Assets) which states</p> <p>‘Protect and enhance groundwater quantity and ensure that development does not place a burden on groundwater flow or quantity’.</p>
11	Environment Agency	5 Baseline – Transport and Accessibility – Recommend consideration is given to site selection for new infrastructure; to be located away from areas of high flood risk and where road drainage may impact on water, and to account for future climate change. Opportunity to advocate maximising opportunities to integrate	<p>Table 5-7 in the IIA Interim Report has been updated to include the following</p> <p>‘Site selection should account for future climate change, and consider locating transport infrastructure away from areas of</p>

ID	Consultee	Comment	Response
		connected blue and green infrastructure (BGI) along transport corridors.	<p>high flood risk, or where road drainage may impact on water quality issues</p> <p>The NLP should maximise opportunities to integrate connected blue and green infrastructure along transport corridors’</p>
12	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Biodiversity Net Gain (BNG) – Worth mentioning the frameworks that underpin BNG, particularly in relation to watercourses.	<p>Table 5-8 in the IIA Interim Report and Table 4-1 in the IIA Interim report have been updated to include the following</p> <p>‘...including consideration of watercourses from the start of the design process in order to maintain the increase in biodiversity over the statutory 30 year period. Developments that seek to create habitat to support species identified as declining should be prioritised.’</p>
13	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Tree Planting – Note that trees planted under council initiatives must be diverse and native species.	<p>Section 8 of Appendix D of the IIA Interim Report has been updated to include the following</p> <p>Addition of an extra sentence which states ‘Trees that are planted must be diverse and native species.’</p>
14	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Issues and Opportunities – Recommend stronger, more detailed wording. Refer to the expectation of development	Table D-8 and Table 4-1 in the IIA Interim Report have been updated to include the following

ID	Consultee	Comment	Response
		adjacent to watercourses to contribute to achieving Water Framework Directive (WFD) objectives.	Addition of an extra bullet point which states ‘Development adjacent to watercourses are expected to contribute to achieving Water Framework Directive objectives relating to ecological status; this includes connectivity for fish and removal of invasive species’
15	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Implications for the NLP – Support the inclusion of wording to reduce the use of hard engineering for future development.	Table D-8 in the IIA Interim Report has been amended to include the following ‘The NLP will need to encourage development opportunities to remove in-channel structures when present within the watercourse, the use of hard engineering should require strong justification’
16	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Key Risks/Opportunities – Recommend actions in relation to the Water Framework Directive (WFD) are considered. Suggest a map of the watercourses and associated WFD status would be useful. Also recommend consideration is made regarding invasive non-native species and their management.	WFD has been considered within the ‘Water Environment’ section of the baseline (Appendix D). This include the ecological status of water bodies. A map of waterbodies hasn’t been included but will be used as part of the site assessments.
17	Environment Agency	5 Baseline – Water Environment – Recommend it is made clear that the WFD also includes groundwater water bodies. Refer to Greenwich Tertiaries and Chalk and its classification.	Appendix D of the IIA Interim Report have been updated to include the following ‘The WFD also includes groundwater water bodies, with the objective of achieving ‘good’

ID	Consultee	Comment	Response
			<p>quantitative and chemical status. The borough contains one such groundwater body, Greenwich Tertiaries and Chalk, which currently has 'poor' chemical and quantitative classification.'</p>
18	Environment Agency	<p>5 Baseline – Water Environment – Issues and Opportunities – Water quality and flood risk should have their own separate subsections. Details are given on the recommended content for each theme.</p>	<p>Table D-13 in the IIA Report and Table 4-1 in the IIA Interim Report have been amended to include the following</p> <p>'...in addition to existing residual flood risk in the event of a breach or failure of the flood defences.'</p> <p>Table D-13 in the IIA Report has been updated to include the following</p> <p>Addition of extra bullet points that state</p> <p>'The NLP should promote that development in close proximity to a watercourse should include the addition of naturalised features to buffer zones to connect the river to the riparian zone, create natural flood management (NFM) schemes, and promote biodiversity.'</p> <p>'The NLP should seek to protect groundwater quality as a water resource. '</p> <p>'The NLP should ensure that development in close proximity to a watercourse should</p>

ID	Consultee	Comment	Response
			<p>include provision of natural, undeveloped buffer zones. These can help contribute to natural flood management (NFM) whilst also allowing access for maintenance and emergency works.'</p> <p>'The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames.'</p>
19	Environment Agency	5 Baseline – Air Quality – Recommend the borough commits to and considers how to deliver an air quality neutral and air quality positive approach. Encourage consideration is also given to how an air quality approach can be linked to other policies.	For consideration by LBTH
20	Environment Agency	5 Baseline – Climate Change and Greenhouse Gases – Issues and Opportunities – Expand the point regarding flooding under the need to implement and facilitate climate change adaptation. Opportunity to discuss the implementation of Nature-based solutions (NbS) to build resilience to climate impacts. Consider habitat connectivity and ensuring wild refuge areas are maintained as fundamentals of creating resilient functioning ecosystems. Recommend creation of new re-naturalised areas. Advise setting a target for the percentage of wild cover within green spaces.	<p>Table D-16 has been updated to include the following:</p> <p>'The NLP should promote the implementation of Nature-based solutions (NbS) to build resilience to facilitate climate change adaptation, whilst providing a feasible method to sequester and store carbon in line with net zero ambitions.'</p> <p>Table D-12 has been updated to include the following</p>

ID	Consultee	Comment	Response
			‘The NLP should set a target for the percentage of wild cover within green spaces to help prevent further biodiversity decline.’
21	Environment Agency	5 Baseline – Material Assets – Geology and soil – Discussion of geology should be expanded to include discussion of the protection of superficial deposits.	Appendix D of the IIA Interim Report have been updated to include the following Addition of an extra sentence which states ‘The Taplow and Kempton Park Gravels in the borough are classified as Secondary A aquifers and are therefore protected superficial deposits.’
22	Environment Agency	5 Baseline – Material Assets – Contaminated Land – Clarify that remediation should seek to protect and improve both groundwater and land quality.	Appendix D of the IIA Interim Report have been updated to include the following Added at end of existing sentence which states ‘...and remediation should seek to protect and improve both groundwater and land quality.’
23	Environment Agency	5 Baseline – Material Assets – Issues and Opportunities – Consider NPPF paragraphs 174 and 183 and promote relevant guidance from the Environment Agency with respect to groundwater and land quality issues. The requirements expected of developers under policies is also noted.	These paragraphs have been considered within the review of plans, policies and programmes. Groundwater issues have been considered within the ‘Water Environment’ topic in Appendix D.

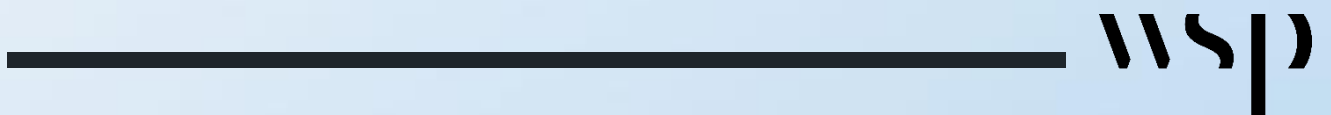
ID	Consultee	Comment	Response
24	Environment Agency	6 IIA Appraisal Framework – Biodiversity and Natural Capital – Note two points to be added to the ‘Key Sustainability Issues and Opportunities’.	<p>The IIA Appraisal Framework has been updated to include the following</p> <p>Addition of two extra bullet points which state</p> <p>‘Developments which encroach on the 10m buffer zone next to a watercourse will fragment habitat connectivity and reduce the ability for biodiversity to thrive.</p> <p>In-channel structures such as weirs and culverts inhibit fish passage and alter the natural state of the river corridor.’</p>
25	Environment Agency	6 IIA Appraisal Framework – Biodiversity and Natural Capital – Note one point to be added to the ‘IIA Supporting Appraisal Questions’ relating to watercourses and river corridors.	<p>The IIA Appraisal Framework has been updated have been updated to include the following</p> <p>‘Re-naturalise the river corridor and promote geomorphological processes which enhance and protect biodiversity?’</p>
26	Environment Agency	6 IIA Appraisal Framework – Water Environment – Sequential approach to decisions on policies and proposals in supporting appraisal questions should be suggested. Similarly to ID17, it is recommended that the issues and opportunities surrounding groundwater are considered. Specific reference to groundwater quality is also recommended.	<p>The IIA Appraisal Framework has been updated to include effects on groundwater.</p>

ID	Consultee	Comment	Response
27	Environment Agency	6 IIA Appraisal Framework – Water Environment – Note one point to be added to the ‘Key Sustainability Issues and Opportunities’ relating to the riparian buffer zone.	The IIA Appraisal Framework has been updated to include the following ‘Increased development which encroaches on a natural riparian buffer zone next to a watercourse, or one which is within a 10m distance from the watercourse, will have a negative effect on water quality and can increase flood risk.’
28	Environment Agency	6 IIA Appraisal Framework – Water Environment – Note one point to be added to the ‘IIA Supporting Appraisal Questions’ relating to natural forms of flood management.	The IIA Appraisal Framework has been updated been updated to include the following ‘Support a natural form of flood management which also promotes biodiversity of the watercourse?’
29	Environment Agency	6 IIA Appraisal Framework – Material Assets – Expand the supporting appraisal questions to consider groundwater and land quality.	The IIA Appraisal Framework has been updated been updated to include the following ‘Protect and enhance groundwater and land quality?’
30	Environment Agency	Appendix A – Table A-7 – Biodiversity and Natural Capital – Recommendation for additional specific information about the Water Framework Directive (WFD).	The WFD has been added to Table E-7 of the IIA Interim Report.

ID	Consultee	Comment	Response
31	Environment Agency	Appendix A – Table A-10 – Water Environment – The Metropolitan Flood Act 1879 should be included.	As this has been superseded this has not been included within Appendix E.
32	Environment Agency	Appendix A – Table A-13 – Material Assets – NPPF paragraph 183 should be included. Note that the Environment Agency will apply the position statements outlined in their Approach to Groundwater Protection.	<p>Table E-13 in the IIA Interim Report have been updated to include the following</p> <p>Paragraph 183 states: <i>“Planning policies and decisions should ensure that:</i></p> <ul style="list-style-type: none"> (a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation) (b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and (c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

Appendix D

Baseline



Introduction

This appendix sets out the baseline information and issues and opportunities. Both the baseline and issues and opportunities have been updated following consultation of the Scoping Report in July 2023.

Population and Equalities

Summary of Current Baseline

The borough has a total population of approximately 310,300 people³⁴. Out of the boroughs within London, LBTH has the highest population density of 15,695 people per square kilometre. This is significantly higher than the regional and national population density averages of 5,598 people per square kilometre, and 434 people per square kilometre, respectively.

The highest proportion of people in the borough are aged between 25-29 years, who make up 14.3% of the total population, as conceptualised in **Figure D-1** overleaf. The percentage of those aged 65 years and over (5.6%) is lower than the London average of 11.9% and the national average of 18.4%.

Within LBTH, approximately 49.8% of the population are females and 50.8% are males. This is comparable to both the London average (51.5% females, 48.5% males) and the national average (51.0% females, 49% males).

³⁴ Office for National Statistics Population and household estimates, England and Wales: Census 2021. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021>

Bangladesh making up the biggest migrant group³⁹. LBTH has a highly mobile population, with 23.5% moving to, from and within the borough each year⁴⁰.

The majority of residents in LBTH are Muslim (39.9%), followed by 'no religion' (26.6%), Christian (22.3%), Hindu (2%), Buddhist (0.95%), other religion (0.53%), Jewish (0.43%), and Sikh (0.31%)⁴¹. However, 6.9% of people did not answer the 2021 Census question about religious belief. Since the 2011 Census, the proportion of Christian residents has fallen by -7.7% (from 30%), and people with 'no religion' has risen by +5.6% (from 21%)⁴². The other faith groups have remained largely unchanged between Census'.

Looking at the Indices of Multiple Deprivation in 2019 (IMD2019), LBTH has become considerably less deprived since IMD2015, ranking 175 in IMD2019 compared to 24 in IMD2015 out of 317 Local Authorities, indicating that the neighbourhoods within the authority have become less deprived relative to other neighbourhoods in England⁴³.

Both the wards of St Peter's and Stepney Green have Lower Super Output Areas (LSOAs)⁴⁴ located within the top 10% of most deprived neighbourhood nationally, whilst there are 13 LSOAs located within the top 20% of most deprived neighbourhoods nationally. Island Gardens is the only ward which has a LSOA located within the top 10% of least deprived neighbourhoods nationally.

The borough has the highest income deprivation affecting older people in England, with 43.9% living in deprived households. The proportion of older persons living in income deprived families is also significantly higher than national averages⁴⁵. Older people in the borough are also much more sensitive to fuel poverty, in line with 1 in 10 older households in the UK are in fuel poverty⁴⁶, with this demographic much more likely to be vulnerable to the issue.

³⁹ Tower Hamlets Council (2020) Borough Profile 2020: Chapter 4: Poverty. Available at: [BoroughProfilePoverty.pptx \(live.com\)](#)

⁴⁰ Wood Group UK Limited (2021) London Borough of Tower Hamlets: Tall Buildings Supplementary Planning Document. Integrated Impact Assessment. Appendix

⁴¹ Office for National Statistics, Religion, England and Wales: Census 2021. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/bulletins/religionenglandandwales/census2021>

⁴² Tower Hamlets Council (2015) Religion in Tower Hamlets: 2011 Census Update. Available at: [2015-04-21-Faith-key-facts-Revised-data.pdf \(towerhamlets.gov.uk\)](#)

⁴³ Ministry of Housing, Communities and Local Government, Indices of Multiple Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

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⁴⁵ Wood Group UK Limited (2021) London Borough of Tower Hamlets: Tall Buildings Supplementary Planning Document. Integrated Impact Assessment – Main Report

⁴⁶ Age UK (2021) The Cost of Cold. Available at: [age-uk-the-cost-of-cold-nmp \(ageuk.org.uk\)](#)

Child poverty within the borough is also significant problem. LBTH has high rates of children living within both relative and absolute low income families⁴⁷, with 27.3% of children in relative low income families and 21.4% within absolute low income families⁴⁰. The borough has the highest rate of child poverty in the UK, with 31% of children living below the national poverty line⁴⁸.

Future Trends and evolution of the baseline without the NLP

The population of LBTH has grown by 22.1% since 2011⁴⁹, the largest percentage growth in population in England, and is predicted to see a population increase of 8.4% by mid-2028⁵⁰. The population isn't just growing it is also becoming younger and more diverse, with the current largest age demographic 25-29 years projected to increase by 11.3%, and almost half of the population by mid-2028 in the 20-39 years bracket. This equates to an increased working age population and a more economically active borough, likely stimulating a higher demand for career opportunities.

By 2033 it is expected that more people will be living on their own, constituting 41% of all households nationally⁵¹. With this statistic in mind, LBTH, along with the rest of the country, is facing a housing crisis. The demand for specific housing which meets need will continue to rise over the coming years.

By 2031, ethnic minority populations are predicted to rise to 37% of the total population of London⁵². LBTH is already a diverse and culturally rich borough, and with this proportion expected to increase, the demand for the provision of cultural spaces and facilities will be prevalent.

The NLP will allow for better management of the types of housing being built in the borough to ensure there is suitable housing to meet the needs of residents both now and in future, reflecting the changing demographic. It would also allow for LBTH to better target community services and facilities to the areas where growth is most likely to occur and/or aid in better dispersing the projected growth in population across more of the borough. This

⁴⁷ Relative low income: This refers to people living in households with income below 60% of the median in that year. Absolute low income: This refers to people living in households with income below 60% of median income in a base year, usually 2010/11. This measurement is adjusted for inflation.

⁴⁸ Tower Hamlets Council (2015) Child poverty in Tower Hamlets – research briefing. Available at: [2015_Child_Poverty_Briefing.pdf \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk/2015_Child_Poverty_Briefing.pdf)

⁴⁹ Office for National Statistics (2022) How the population changed in Tower Hamlets: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000030/>

⁵⁰ Office for National Statistics, Subnational population projections for England: 2018-based. Available at: <https://www.ons.gov.uk/releases/subnationalpopulationprojectionsforengland2018based>

⁵¹ The Kings Fund. 2012. Demography: Future Trends. Available at: <https://www.kingsfund.org.uk/projects/time-think-differently/trends-demography>

⁵² Wohland, P. et al. (2010). Research paper. 'Ethnic population projections for the UK and local areas, 2001-2015'. University of Leeds.

will also help to support community cohesion which will likely become more pertinent as the population becomes more ethnically diverse.

Issues and Opportunities

Issues and opportunities for population and equalities and the implications for the Local Plan have been identified in **Table D-1**.

Table D-1 – Issues and Opportunities for Population and Equalities

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income; ■ There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities; ■ The population of the borough is expected to increase both in number and diversity, and decrease in age profile; and ■ Changing work habits such as remote, internet-based jobs are likely to reduce current demands but may also increase social isolation and reliance on alternative social interaction. 	<ul style="list-style-type: none"> ■ The NLP will need to address any necessary housing and service development to ensure provisions to young adults and socially excluded population groups; ■ Development will need to support future demographic change, tackle overcrowding and increase affordable housing stock; and ■ The NLP will need to ensure there are adequate provisions of services and facilities within the borough, particularly for young adults, socially excluded groups and people with disabilities.

Human Health

Summary of Current Baseline

The average life expectancy at birth in LBTH is similar but slightly higher than the national average at 79.9 years for male and 83.3 years for females⁵³. This is slightly lower than the average for the London region at 80.3 years and 84.3 years respectively. Health inequalities are prevalent, with life expectancy lower in the most deprived areas than the least deprived areas for both men and women, at 11.4 years and 4.8 years respectively. This indicates human health disparity between gender and socio-economic groups.

In LBTH, 67.2% of adults (aged 19+) are physically active⁵⁴. This is higher than both the regional and national averages at 66.4% and 66.3% respectively. The proportion of adults (aged 18+) classified as overweight or obese in LBTH is 49.1% and is significantly better than the national average. This is lower than the regional average of 55.9% and significantly lower than the national average of 62%. In year six children (aged 10-11 years) the prevalence of obesity (including severe obesity) is 25.3%, significantly worse than the national average of 20.2%. The percentage of children in low-income families is also significantly worse than the England average, at 30.3%. The regional and national averages are 18.8% and 17.0% respectively.

The IMD2019 health domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. LBTH is ranked 95th out of 317 local authorities²¹. Of the 144 Lower Super Output Areas (LSOAs) in the borough, one is located within the top 10% of most deprived neighbourhoods nationally in terms of health deprivation, whilst 25 are located in the top 20%²¹.

Poor air quality is a significant public health issue⁵⁵ and there is clear evidence that particulate matter has a significant contributory role in mortality. Each year in the UK between 28,000 and 36,000 deaths a year are attributed to long-term exposure to poor air quality⁵⁶. Air pollution can also be linked to cardiovascular disease, diabetes, and dementia. Sufferers of chronic respiratory diseases such as Chronic Obstructive Pulmonary Disease (COPD) and asthma are especially vulnerable to the effects of air pollutants. Air

⁵³ Tower Hamlets Local Authority Health Profile 2020. [online] Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/102/are/E09000030>

⁵⁴ Office for Health Improvement and Disparities. Local Authority Health Profiles (2019). Available online at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/13/qid/1938133216/pat/6/par/E12000007/ati/102/are/E09000030/yr/3/cid/4/tbm/1>

⁵⁵ Department for Environment Food and Rural Affairs, Air Quality: Public Health Impacts and Local Actions. Available online at: [https://aqm.defra.gov.uk/documents/air_quality_note_v7a-\(3\).pdf](https://aqm.defra.gov.uk/documents/air_quality_note_v7a-(3).pdf)

⁵⁶ Gov.uk, Public Health England publishes air pollution evidence review, 2019 [online] available at: <https://www.gov.uk/government/news/public-health-england-publishes-air-pollution-evidence-review>

pollution has also been shown to have an increased health impact on those in lower socio-economic groups.

The entirety of LBTH is situated within an Air Quality Management Area (AQMA) declared in 2000 for Particulate Matter (PM10) and Nitrogen dioxide (NO₂)⁵⁷. The AQMA identifies areas of higher air pollution that may affect health, from transport and industrial sources.

The borough has a higher rate of emergency hospital admissions for COPD when compared to the national average, with the majority of wards above the national average. LBTH as a borough admits 166.0 people per 100,000 people for COPD, higher compared to the national average (100.0 people per 100,000 people)⁵⁸. St Peter's area has the highest admission rate of any ward within the borough, at 311.3 people per 100,000 people. Conversely, St Katherine's and Wapping performs better than the national average with 43.3 people per 100,000 people admitted.

The mortality rate (under 75 years) from all causes in LBTH is 361.1 people per 100,000 people⁵³. This is significantly higher than the regional average of 303.3 people per 100,000 people and the national average of 330.5 people per 100,000 people.

The prevalence of smoking in LBTH among adults (aged 18+) is 20.3%⁵³. This is higher than the regional average (13.9%) and the national average (14.4%).

Social isolation can lead to loneliness which has the potential to undermine well-being thereby impacting negatively on people's quality of life. Loneliness can have a huge impact on the wellbeing of many people particularly older people, those with disabilities and new and expectant mothers. It can often result in unhappiness, lowering of self-confidence and ability to reach out for help.

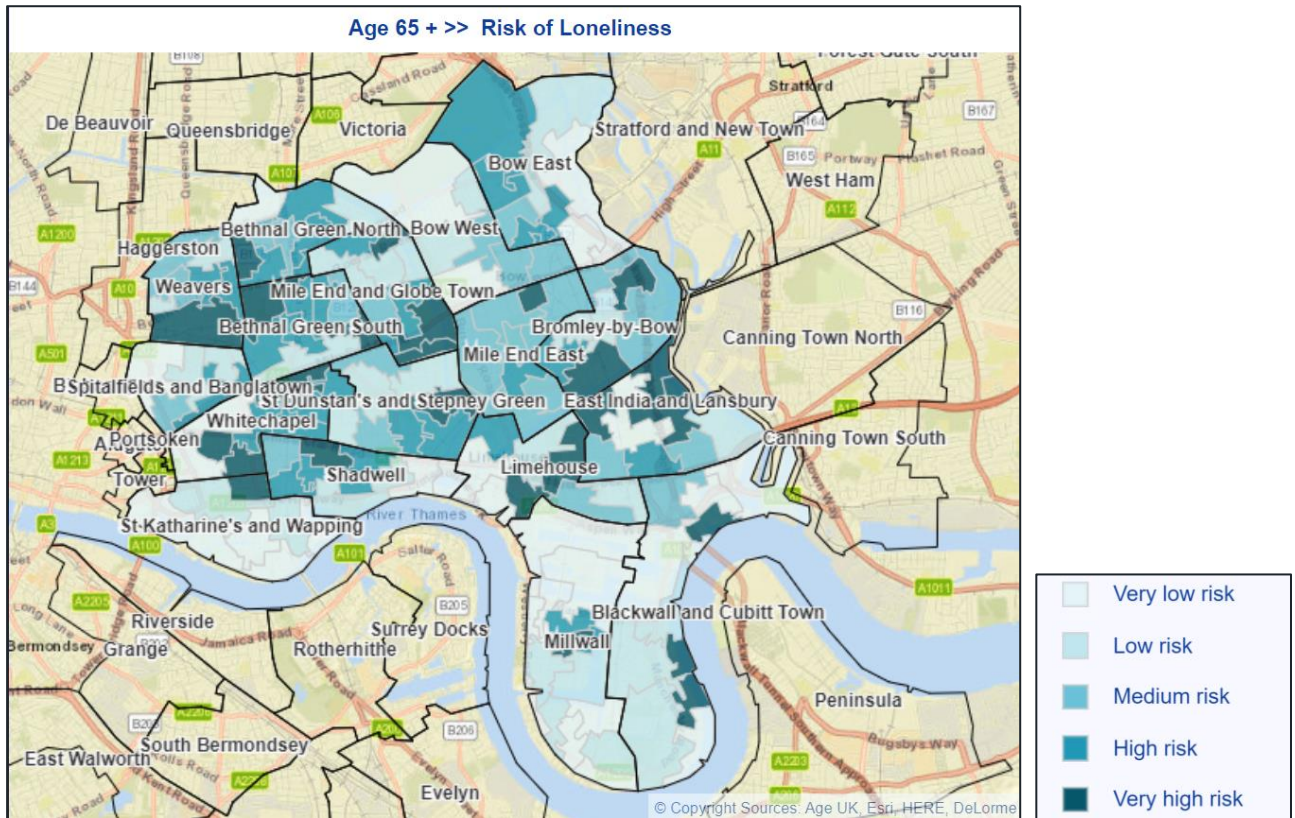
According to Age UK, the majority of the people aged 65 and over in the south of LBTH are within very low and low risk areas for loneliness with areas in the UK ranked from 1 high risk to 32,844 very low risk⁵⁹. However, the centre and north of LBTH are within medium, high risk, and very high risk of loneliness. The heat map in **Figure D-2** overleaf visualises this trend.

⁵⁷ Department for Environment Food and Rural Affairs, UK AIR, Tower Hamlets AQMA. Available online at: https://uk-air.defra.gov.uk/aqma/details?aqma_ref=141#132

⁵⁸ Public Health England, 2021. Local Health [online] Available at: https://www.localhealth.org.uk/#bbox=377927,397127,28450,17731&c=indicator&i=t3.em_adm_copd&selcodgeo=E08000007&view=map10

⁵⁹ Age UK (2016). Risk of Loneliness. Available online at: <https://www.ageuk.org.uk/our-impact/policy-research/loneliness-research-and-resources/loneliness-maps/>

Figure D-2 – Heat Map of Relative Risk of Loneliness⁵⁹



The spread of COVID-19 in the UK has resulted in significant pressure upon NHS resources, particularly hospitals, and has resulted in additional wait times for routine healthcare appointments across services. Since the start of the Covid-19 pandemic, 114,550 positive cases and 646 deaths (194.6 people per 100,000 people) have been recorded within the borough, lower than the regional (283 people per 100,000) and national (326.4 people per 100,000) figures⁶⁰.

In total, 604,248 vaccinations have been given – 238,909 people have received one dose (66.1% of 12+ year olds), 218,819 people have received two doses (60.5% of 12+ year olds) and 146,520 (40.5% of 12+ year olds) have received either a booster or a third dose⁴⁶. The uptake of vaccinations is lower than the national average (78.1% one dose, 74.5% two doses and 59.2% booster or a third dose) and regional averages (68.1% one dose, 64% two doses and 46.8% booster or a third dose)⁶⁰.

Fuel poverty is determined if a household has required fuel costs that are above average (the national median level) and were they to spend that amount, they would be left with a

⁶⁰ UK Government (2022). Coronavirus (COVID-19) in the UK – Cases in Tower Hamlets. [online] Available at: <https://coronavirus.data.gov.uk/details/cases?areaType=itla&areaName=Stockport>

residual income below the official poverty line⁶¹. 14.2% of households in LBTH are estimated to be in fuel poverty, compared to the national average of 13.4%⁶².

Future Trends And Evolution Of The Baseline Without The NLP

The increasing population of LBTH and the observed active nature of its adults will likely result in increased demand for exercise facilities and open access outdoor space.

Social isolation and loneliness are also likely to become more prevalent in LBTH as more people work from home, particularly due to and following the COVID-19 pandemic. This has the potential to undermine well-being, thereby impacting negatively on people’s quality of life. Social isolation and loneliness are also associated with increasing the likelihood of sensory and mobility impairments and deteriorating health.

Covid-19 has also exacerbated existing inequalities in LBTH. Without preparedness and effective response to resurgence of Covid-19, including increased vaccine rollout, issues such as social isolation and loneliness could be exacerbated. The rising cost of living, or ‘Cost-of-Living Crisis’, is also predicted to impact those with pre-existing mental health problems, as they are among those at greatest risk⁶³. It is well documented that recessions increase social inequalities, which are drivers of poor mental health⁶⁴.

The prevalence of obesity in Year 6 children is also a concern that must be addressed, without healthy child weight strategies these particularly bad health incomes for children will persist.

The anticipated population growth and the increasing affordability and convenience of car travel is likely to result in an increase in the number of private vehicles on the roads. This could have cumulative effects on air quality, noise pollution and public health if current trends continue.

Air pollution has been linked to diabetes and dementia – both chronic illnesses in the UK are expected to rise in future. Increased mortality and morbidity amongst diabetics are associated with increased NO2 concentrations with long term exposure to traffic borne air

⁶¹ Department for Business, Energy & Industrial Strategy. Fuel Poverty Statistics. Available at: <https://www.gov.uk/government/collections/fuel-poverty-statistics>

⁶² Department for Business, Energy & Industrial Strategy. Sub-regional fuel poverty data 2021. Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2021>

⁶³ Mental Health Foundation (2023) Mental Health and the Cost-of-Living Crisis: Another pandemic in the making? Available at: <https://www.mentalhealth.org.uk/our-work/policy-and-advocacy/mental-health-and-cost-of-living-crisis-report>

⁶⁴ Wahlbeck, K. & McDauid, D. (2012), ‘Actions to alleviate the mental health impact of the economic crisis’, World Psychiatry Available at: <https://doi.org/10.1002/j.2051-5545.2012.tb00114.x>

pollution positively correlating with incidence of type two diabetes and increased mortality among diabetics⁶⁵.

In 2022, the government published the Levelling Up white paper⁶⁶, setting out a broad approach to rebalancing the UK economy and addressing significant regional inequalities that restrict people, places, and prosperity. If the Levelling Up and Regeneration Bill come into force, there is potential to reduce inequalities within the borough, improving health outcomes.

Due to the population density within the borough and high number of high-rise buildings, the urban heat island effect is a prevalent issue in the borough. The urban heat island effect reduces the ability for cities to cool subsequently having adverse effects on health the health of the local populations, particularly for more those vulnerable groups such as older people, young children and those with pre-existing health conditions such as asthma and/or cardiovascular disease.

In addition to the urban heat island effect, climate change is projected to increase the probability of overheating in London⁶⁷. As the population increases and the effects of climate change become more prevalent, there is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation.

Without a NLP it is likely that health issues within the borough will continue to persist. The plan would allow for LBTH to better target community services, greenspaces and sports/recreational facilities to the areas where growth is most likely to occur and/or aid in better dispersing the projected growth in population across more of the borough. This will also help to support community cohesion and reduce isolation.

⁶⁵ Committee on the Medical Effects of Air Pollutants (COMEAP), The Mortality Effects of Long-Term Exposure to Particulate Air Pollution in the United Kingdom, 2010, [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/304641/COMEAP_mortality_effects_of_long_term_exposure.pdf

⁶⁶ Department for Levelling Up, Housing and Communities, Levelling Up and Regeneration [online] available at: <https://www.gov.uk/government/publications/levelling-up-and-regeneration-further-information/levelling-up-and-regeneration-further-information>

⁶⁷ Kolokotroni, M et al, London's urban heat island: Impact on current and future energy consumption in office buildings, Energy and Buildings Volume 47, 2012 [online] available at: <https://www.sciencedirect.com/science/article/pii/S0378778811006293?via%3Dihub>

Issues and Opportunities

Issues and opportunities for human health and the implications for the NLP have been identified in **Table D-2**.

Table D-2 – Issues and Opportunities for Human Health

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ LBTH’s reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness, smoking, and STI treatment; ■ There are significant health inequalities amongst residents in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents; ■ Covid-19 has also exacerbated existing inequalities in the borough; ■ There are high levels of obesity within children aged 10-11 years; and ■ The urban heat island effect is having adverse effects on the health of the local population, particularly those more vulnerable groups. 	<ul style="list-style-type: none"> ■ The NLP should maximise opportunities to enhance walking and cycling routes and encourage the use of non-motorised forms of transport. This will help to improve levels of physical activity within the borough; ■ There will be a need to improve public transport users’ confidence in returning to public transport post-Covid19; ■ The NLP should ensure developments contribute positively to accessible neighbourhoods, reducing health inequalities in accessibility; ■ There will be an ongoing need to provide services and affordable housing facilities in order to meet the needs of younger residents; ■ There is a need for the NLP address issues with inequalities and ‘level up’ the borough following the Covid-19 pandemic; ■ There is a requirement for implementation of healthy child weight initiatives; ■ The NLP should provide early support for individuals at risk of loneliness and subsequent poor mental health, treating them with the same level of care as physical conditions; ■ There is a need to provide more greenspaces and high quality public

Key Risks/Opportunities	Implications for the NLP
	<p>realm which can provide social spaces; and</p> <ul style="list-style-type: none"> There is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation.

Economy and Employment

Summary of Current Baseline

In 2021, 76.9% of the population within the LBTH were of working age (between 16-64 years) which is slightly higher than both the regional and national averages of 70.0% and 64.2% respectively³⁴. Employment rates for people of working age (between 16-64 years) is in line with but slightly lower than the regional average (75.8%) and national average (75.7%) at 72.8%. Between 2011 and 2021, there has been a 2.0% increase in the number of economically active people in the borough⁶⁸.

LBTH has a diverse employment market, with large clusters of offices in Canary Wharf and the City Fringe, and industrial areas that provide logistics support for the whole of Central London. In 2017, LBTH economic output was £29.7bn, with the economy growing by 49% across the decade prior⁶⁹.

This brings a significant amount of employment opportunities, with job density in LBTH recorded as 1.31 which is higher than the regional job density of 1.02 and significantly higher than the national job density of 0.85⁷⁰.

Despite this, LBTH has a relatively high economic inactivity rate. From 2021 to 2022, 24.5% of the borough’s working age population were economically inactive, compared to 20.6% in London and 21.6% in Great Britain⁷⁰. There is also gender disparity in the economically active population, with 25.4% more males than females economically active.

⁶⁸ Office for National Statistics. Employment in local authorities, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/employmentinlocalauthoritiesenglandandwales/census2021>

⁶⁹ Tower Hamlets Council (2020) Borough Profile 2020: Economy. Available at: https://www.towerhamlets.gov.uk/ignl/community_and_living/borough_statistics/Borough_profile.aspx

⁷⁰ Nomis (2021) Labour Market Profile. Available online at: <https://www.nomisweb.co.uk/reports/lmp/la/contents.aspx>

As of 2021, there are 311,000 jobs in LBTH⁷⁰, however the vast majority are filled by non-residents and employees commuting from outside the borough⁷¹, with approximately 15% taken by local residents⁷². The borough's daytime population increases by about 60% as a result of the large working weekday population⁷³. However, since the Covid-19 pandemic, 50.3% of people aged 16+ in employment in the borough work mainly at or from home⁷⁴.

LBTH performs better than the medium for gross median weekly pay (£718.70) compared to the regional average (£645.80) and national average (£536.60)⁷⁵. Gross disposable household income (GDPI) per head is however considerably lower than the regional average (£29,890) at £26,175, but significantly higher than the national average £21,962.

LBTH has a high level of productivity, with £112,559 gross value added (GVA) per head in 2020 which is higher than the London average of £52,239 GVA per head⁷⁶. However, although this has increased by 9.8% since 2015, it has decreased by 10.8% since 2017. Despite this, GVA in LBTH is significantly higher than the 2020 national average of £29,757 per head.

Table D-3 shows the borough's key economic sectors compared to regional and national averages. Financial and insurance activities are the largest economic sector in the LBTH, with a higher employment rate than the regional and national averages. This is followed by professional, scientific and technical activities, information and communication, administrative and support services activities, human health and social work activities, education and wholesale and retail trade.

⁷¹ Tower Hamlets Council (2019) London Borough of Tower Hamlets: Third Local Implementation Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=143901>

⁷² Canary Wharf Group & Elba (2022) PEG: Economy, Cost of Living and Levelling Up. Available at: <https://www.towerhamlets.gov.uk/thp/ITEM-3-Economy-cost-of-living-and-levelling-up.pdf>

⁷³ Office for National Statistics (2022) Travel to work, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkenglandandwales/census2021>

⁷⁴ Tower Hamlets Council (2011) Tower Hamlets Employment Strategy. Available at <https://democracy.towerhamlets.gov.uk/documents/s21806/>

⁷⁵ Office for National Statistics (2023) Subnational indicators dataset. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/datasets/subnationalindicatorsdataset>

⁷⁶ Office for National Statistics (2022) Regional gross value added (balanced) per head and income components. Available at: <https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/nominalregionalgrossvalueaddedbalancedperheadandincomecomponents>

Table D-3 – Employment by Economic Sector (%)⁷⁰

Industry	Tower Hamlets (%)	London (%)	Great Britain (%)
B : Mining And Quarrying	0.0	0.0	0.1
C : Manufacturing	0.9	2.1	7.6
D : Electricity, Gas, Steam And Air Conditioning Supply	0.2	0.4	0.4
E : Water Supply; Sewerage, Waste Management And Remediation Activities	0.1	0.3	0.7
F : Construction	1.7	3.5	4.9
G : Wholesale And Retail Trade; Repair Of Motor Vehicles And Motorcycles	6.2	11.5	14.4
H : Transportation And Storage	2.1	4.3	5.1
I : Accommodation And Food Service Activities	5.2	7.4	7.5
J : Information And Communication	10.0	8.4	4.5
K : Financial And Insurance Activities	23.7	8.0	3.6
L : Real Estate Activities	2.1	2.5	1.8
M : Professional, Scientific And Technical Activities	16.8	14.2	8.9
N : Administrative And Support Service Activities	9.6	9.7	8.9

Industry	Tower Hamlets (%)	London (%)	Great Britain (%)
O : Public Administration And Defence; Compulsory Social Security	4.1	4.6	4.6
P : Education	6.2	7.3	8.8
Q : Human Health And Social Work Activities	7.6	10.6	13.7
R : Arts, Entertainment And Recreation	1.5	2.8	2.3
S : Other Service Activities	1.5	2.5	1.9

The financial and insurance industry is the largest in LBTH based on the number of jobs, accounting for 23.7% of roles in the borough. The high level of employment in professional, scientific and technical industries is not surprising given that the borough’s population are highly skilled.

Of the population in LBTH, 52.1% have obtained level 4 qualifications or above which is higher than the national average by 8.4%⁷⁰. However, the percentage of the population with no qualifications is in line with the national average (6.6%) at 6.5%, and higher than the regional average of 5.5%.

The Covid-19 crisis impacted nearly all residents and local businesses in the borough. LBTH has implemented the Mayor’s Covid Recovery Fund initiative, a multi-million-pound scheme to kickstart the economic, health and social recovery from Covid-19⁷⁷. It consists of grants to support the recovery of residents, businesses, and community organisations from the impact of the pandemic, supporting 25 vital projects in the borough. The pandemic has also changed the way people are working with many employers now allowing employees to work from home, increasing flexibility and resilience in the workforce.

⁷⁷ Tower Hamlets Council (2021) £3million boost to kickstart the borough's path out of the pandemic. Available at: https://www.towerhamlets.gov.uk/News_events/2021/July-2021/3million-boost-to-kickstart-the-boroughs-path-out-of-the-pandemic.aspx

In March 2020, in line with the Equalities Act 2010, the gender pay gap figures for women in LBTH were that they were earning 92.83% of the average (mean) pay of men⁷⁶. However, there is no one reason behind the gender pay gap, with caring responsibilities, a divided labour market, discrimination, and men tending to work in senior roles all contributing factors.

Future Trends and evolution of the baseline without the NLP

The rising population in the region is accelerating the need for the delivery of additional housing, services, and infrastructure. Growth in jobs is also anticipated in order to close the gap between increases in population and the need for employment. There is a need for improving accessibility to these jobs and training opportunities, particularly given that the levels of non-resident workers commuting into LBTH is significant.

The population is becoming younger, and the working age is increasing. However, the working age population has a relatively high economic inactivity rate. The increase in the percentage of the population that is of working age is expected to increase local economic activity levels and the supply of labour.

A NLP would allow for the delivery of new employment opportunities within the borough that are more targeted to the specific residents' needs and will help to tackle economic inactivity. The construction of new development will provide opportunities for employment within the borough. In addition to this, new developments will help to maximise social value outcomes for the local community by considering benefits to existing residents, businesses and other stakeholders as well as those expected to use the new development.

During and since the Covid-19 pandemic, homeworking has been encouraged for those who are able, changing the way people work. This trend will likely continue as employers look to maintain flexible working conditions in future. However, with the Cost-of-Living Crisis and rising energy bills, this is difficult for some households to maintain, not helped by 29,000 employees earning less than the London Living Wage (LLW)⁷².

Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping. This issue may not be addressed without the presence of the local plan and specific developments and policies targeting town centres and high streets.

Issues and Opportunities

Issues and opportunities for economy and employment and the implications for the NLP have been identified in **Table D-4**.

Table D-4 – Issues and Opportunities for Economy and Employment

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ LBTH is a major location for employment in London, attracting a large daytime population of workers; ■ Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount are employed. Employed residents in LBTH have a higher gross value added (GVA) per head and gross weekly pay; ■ However, there is a higher economic activity rate, with more males economically active than females; ■ This also highlights that there may be a need to diversify employment within the borough, particularly to match the skills of existing residents; ■ It is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough; and ■ Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping. 	<ul style="list-style-type: none"> ■ The NLP should endeavour to improve connectivity between business clusters and housing markets (both planned and existing) in the borough, which will help to improve access to the skills pool as well supporting improvements in productivity; ■ The NLP should support the development of new employment sites and maintain vitality in key centres; ■ The NLP should seek to boost jobs and business, by supporting small businesses, start-ups, and markets, and creating jobs and training opportunities; ■ The NLP should encourage new developments to maximise social value benefits; and ■ The NLP should maintain the vitality and attractiveness of town centres by supporting their recovery from Covid-19 through the provision and protection of retail, shops, and businesses, with the provision of affordable retail and commercial space encouraged.

Housing

Summary of Current Baseline

LBTH position within London and its good transport links make it attractive to commuters and non-resident workers. However, this puts pressure on house prices. People from outside the area buying houses closer to work to shorten commuting time, limits the availability of housing that is affordable for younger buyers 'First Homes' and/or those on lower incomes.

House prices in LBTH have increased by 9.6% between January 2022 and January 2023, from £445,861 to £488,833⁷⁸. This is substantially higher than the England average of £310,159 (January 2023). However, house prices in LBTH are lower than the London average of £533,986. Annual price changes of a property in LBTH (9.6%) are significantly higher than both London (3.2%) and England (6.9%). The average house price in LBTH has increased by £118,333 since April 2013⁷⁹.

Figure D-3 compares the average house prices (as of January 2023) of the surrounding local authorities⁸⁰. This shows that of the 32 London boroughs, and the City of London, that make up London, Barking and Dagenham has the lowest average house prices. Kensington and Chelsea have significantly higher average house prices compared to the other local authorities in London. LBTH is the 21st least affordable borough in London. The sales volume for LBTH has decreased from November 2021 (245 sales) to November 2022 (185 sales), as it has for London over the same period (8,130 sales to 6,129 sales).

⁷⁸ HM Land Registry (2023) UK House Price Index England: January 2023. Available at: <https://www.gov.uk/government/statistics/uk-house-price-index-for-january-2023/uk-house-price-index-england-january-2023>

⁷⁹ Tower Hamlets Council (2013) House prices: Private rental market and House price trends in Tower Hamlets. Available at: https://www.towerhamlets.gov.uk/ignl/community_and_living/borough_statistics/housing.aspx

⁸⁰ Land Registry Data (2023) UK House Price Index. Available at: <https://landregistry.data.gov.uk/app/ukhpi>

Figure D-3 – Average House Prices by Local Authority Area⁸⁰

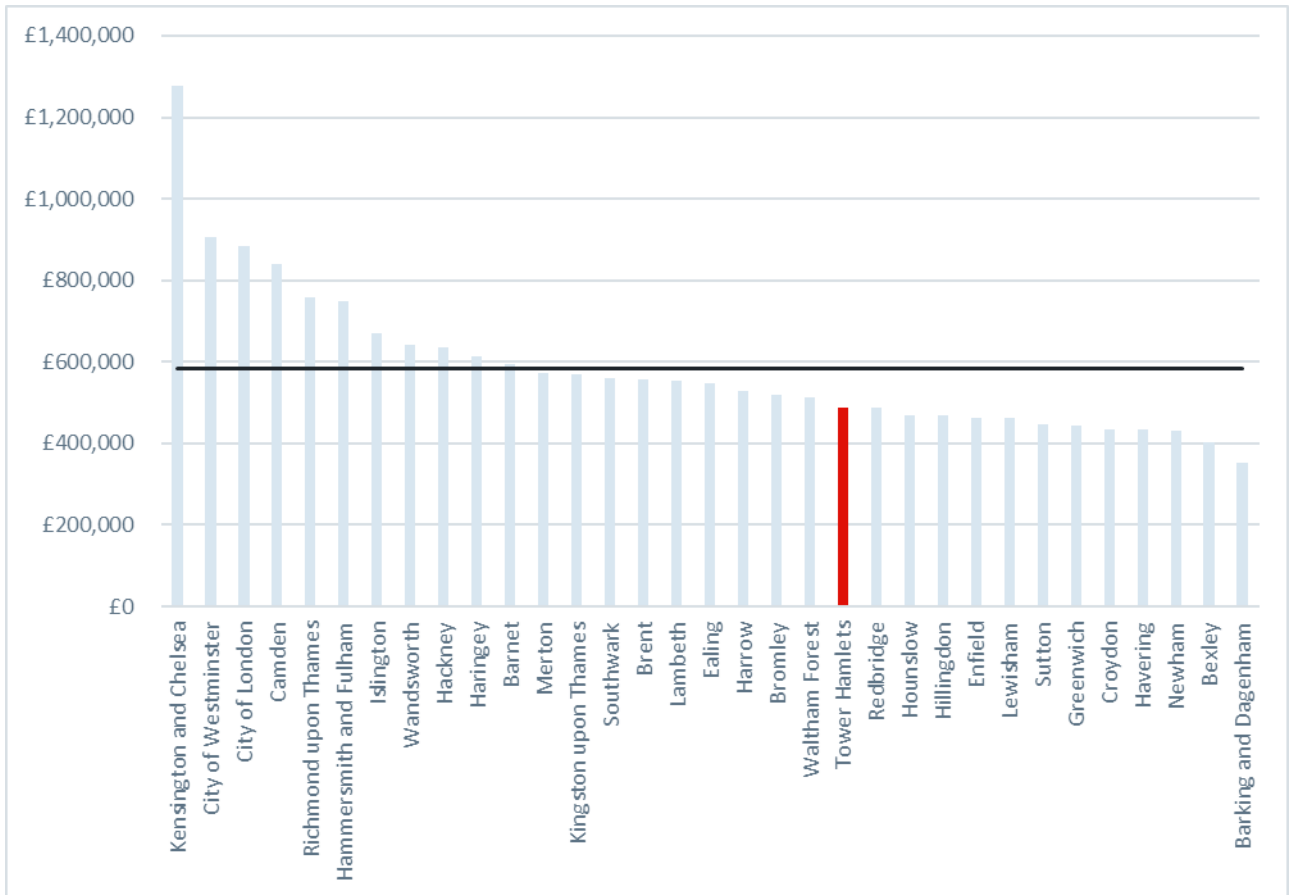
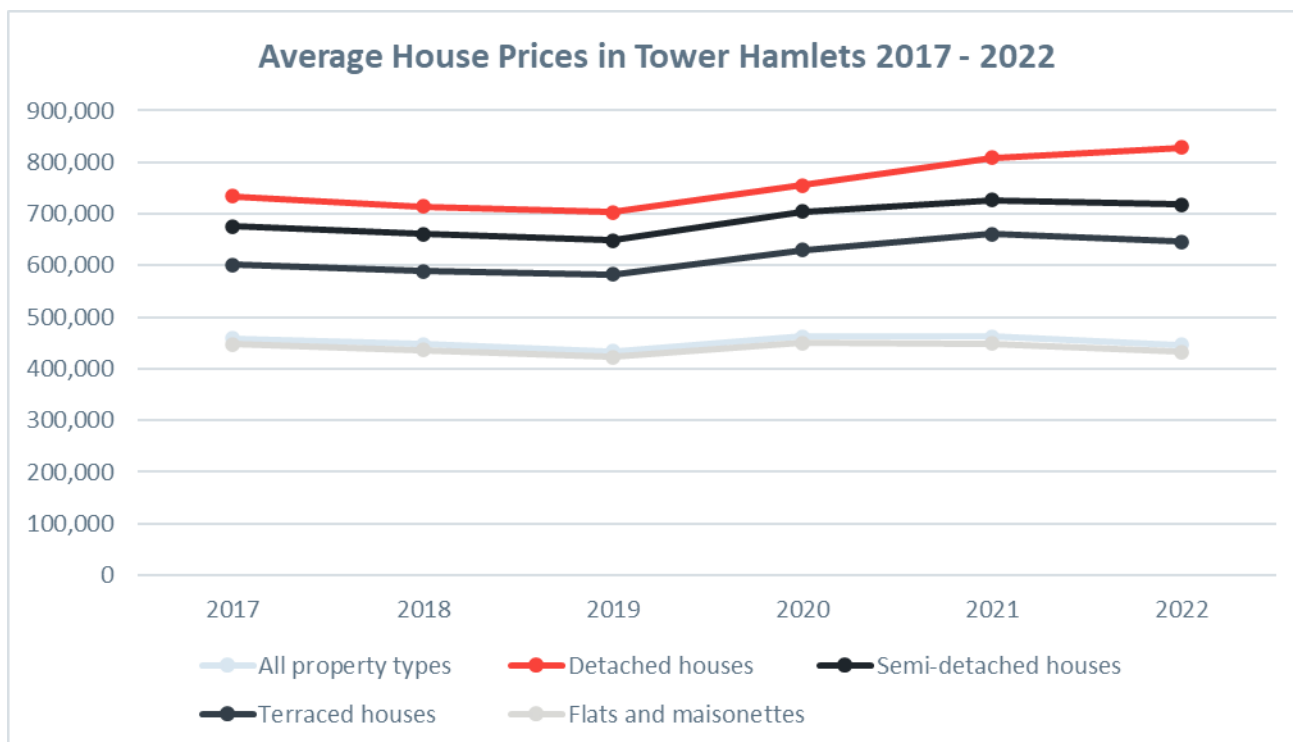


Figure D-4 overleaf shows the changes in property prices in LBTH across the different housing types since 2017. Overall, prices have increased for detached houses, semi-detached houses, and terrace houses, with detached housing seeing the largest increase, especially during and after the Covid-19 pandemic hit in 2020, where homes with more space and a garden become more of a priority. All property types and flats and maisonettes have plateaued.

Figure D-4 – Average House Prices in Tower Hamlets (2017-2022)⁸⁰



**Average house prices based on January values*

The average mean salary in 2022 in LBTH was £46,716⁸¹. According To Tower Hamlet’s draft Local Housing Needs Assessment (LHNA)⁸², in order to be able to buy a property in the borough (assuming a 10% deposit), the estimated annual household income required is £75,000. This increases to £82,000 within the City Fringe area and £98,000 in the Isle of Dogs and South Poplar area.

In terms of renting privately, the estimated annual household income required to rent in the borough is £56,600. Again, this increases to £60,000 in the City Fringe area and £64,000 in Isle of Dogs and South Poplar area.

The LHNA has identified that 29,000 households in need of housing. The greatest proportion of those in need of housing (66.1%) is due to overcrowding. Over three-quarters of those households in need are unlikely to be able to afford market housing to buy or rent and therefore there is a current need from 22,515 households. As of November 2022, there were over 12,000 claimants of housing benefit, which has increased since Covid-19⁶⁷.

⁸¹ Annual Survey of Hours and Earnings (ASHE) 2023 [online] available at: <https://www.ons.gov.uk/surveys/informationforbusinesses/businesssurveys/annualsurveyofhoursandearningsashe>

⁸² Icenl on behalf of Tower Hamlets, Draft Local Housing Needs Assessment, 2023

The primary underlying reason for homelessness within LBTH is the lack of affordable accommodation. LBTH has a statutory responsibility under the Homelessness Reduction Act 2017⁸³ to provide advice and information about homelessness and the prevention of homelessness within the borough. Out of 610 total initial assessments, 265 households in LBTH were threatened with homelessness between July-September 2022⁸⁴. As of 2017/18, 375 people were rough sleeping in LBTH as identified in the Homelessness and Rough Sleeping Strategy 2018-2023⁸⁵.

LBTH is seeking to provide more affordable housing and their Housing Strategy 2016-21 (Section 4 – Delivery Theme 1) states that the council has a strategic target of affordable housing of 50% from all new housing developments⁸⁶. The Strategic Plan 2022-26 develops upon this, indicating that LBTH will work with developers and housing associations to deliver a minimum of 1000 social homes for rent each year.

Future Trends And Evolution Of The Baseline Without The NLP

The London Plan 2021 **Error! Bookmark not defined.** has identified a 10-year housing supply target of 34,730 new homes for LBTH (2019/20 -2028/29). In 2018, LBTH identified a need for over 54,000 new homes expected to be built in the borough by 2030/31³⁹, with the majority of projected units in the Canary Wharf ward.

LBTH's population becoming younger and more diverse is happening at a higher rate than regional and national averages. Projections show that almost half of the population will be aged 20-39 by mid-2028. Therefore, the demand on affordable housing will increase.

There is also an increased risk of homelessness due to the effects of the decline in incomes that have resulted from the pandemic and the increased cost of living. There were 2,690 people estimated to be sleeping rough on a single night in autumn in 2020 (during the pandemic)⁸⁷. This declined by 9% in 2021, however, the levels of homelessness in England are still 38% higher than 2010 levels. Providing affordable housing is critical to tackling homelessness, among other issues such as overcrowding.

The current cost of living crisis in the UK is set to continue, which is likely to reduce residents' disposable income, particularly if inflation continues to outstrip increases in

⁸³ Legislation.gov.uk (2017) Homelessness Reduction Act 2017. Available at: <https://www.legislation.gov.uk/ukpga/2017/13/contents/enacted>

⁸⁴ Gov.uk (2023) Tables on homelessness. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

⁸⁵ Tower Hamlets Council (2018) Homelessness and Rough Sleeping Strategy 2018-2023 https://www.towerhamlets.gov.uk/Documents/Homelessness_and_Rough_Sleeping_Strategy_2018_2023.pdf

⁸⁶ Tower Hamlets Council (2016) London Borough of Tower Hamlets 2016-21 Housing Strategy https://www.towerhamlets.gov.uk/Documents/Housing/THHF/TH_Housing_Strategy_document_v5.pdf

⁸⁷ Department for Levelling UP, Housing & Communities (2022) Official Statistics – Rough sleeping snapshot in England: autumn 2021. Available at: <https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2021/rough-sleeping-snapshot-in-england-autumn-2021>

nominal wages. The Bank of England has forecasted that real household disposable income fell by 2.5% in 2022 and is anticipated to fall by a further 2.6% in 2023⁸⁸. Wage growth in the last year has not been sufficient to keep pace with inflation, with underlying pay growth of only 4% in February 2022.

Rising costs of living is likely to widen levels of inequality in the borough. However, with the Levelling Up and Regeneration Bill that have come into force, there is potential to reduce inequalities within the borough, although, this will be highly dependent upon the schemes and initiatives that come forward.

The absence of the NLP would not halt the delivery of housing in borough as applications for planning permission would be determined in accordance with both the NPPF and the London Plan. However, without specific local policies guiding the quantum, type and location of new development, the extent to which new development meets the needs of the Borough would be more uncertain. This could give rise to inappropriately located developments and missed opportunities to tackle deprivation, affordability and provide community services and facilities.

Issues and Opportunities

Issues and opportunities for housing and the implications for the NLP have been identified in **Table D-5**.

Table D-5 – Issues and Opportunities for Housing

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There is significant need for affordable properties to buy and rent, however rising costs of living and above average house prices are affecting the number of residents able to afford to buy; ■ There are significant levels of overcrowding in the borough with 66% of those in need of housing currently living in overcrowded conditions; ■ The Covid-19 pandemic and rising cost of living are increasing levels of homelessness; and 	<ul style="list-style-type: none"> ■ The NLP will need to ensure housing requirements are being worked towards, especially by expanding increasing the availability of affordable housing. ■ The NLP will need to consider differing population needs, including the demands of a young and diverse population.

⁸⁸ Institute for Government, Cost of Living Crisis, [online] available at: <https://www.instituteforgovernment.org.uk/explainers/cost-living-crisis>

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ▪ The lack of affordable housing, means that young people and/or lower income groups are missing out. 	

Crime and Safety

Summary of Current Baseline

Ensuring community safety is key for achieving a positive state of well-being among people within social and physical environments. It is as much about reducing and preventing crime as it is about building strong and vibrant communities. This means the perception of safety within the borough’s communities is as important as measuring crime rates.

The number of casualties in LBTH killed and seriously injured (KSI) on roads for 2021 was 302.1 people (per 100,000 resident population)⁵⁸. This is higher and worse than both the regional (194.0 people per 100,000) and the national (95.6 people per 100,000) averages.

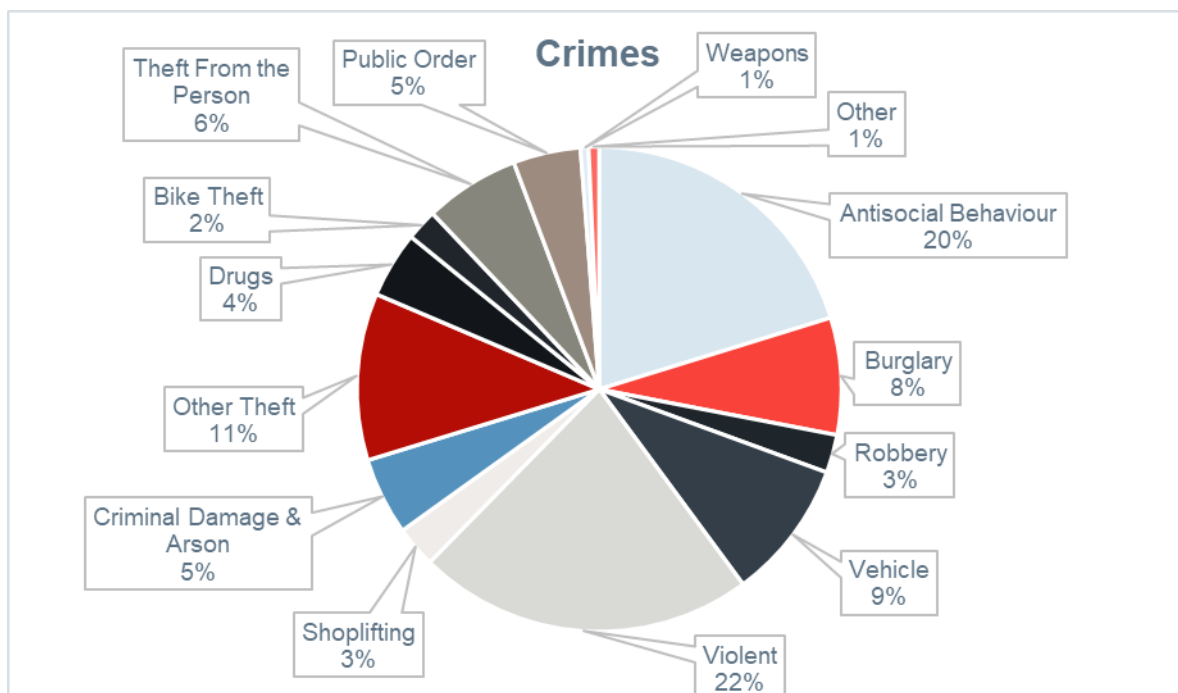
Crime rates in LBTH are high, with over 127.5 crimes per 1,000 people in the last year (February 2022-February 2023)⁸⁹, making the borough among the top 10 most dangerous London boroughs, and 6% more dangerous than the average for London⁹⁰.

As of January 2023, the most dominant crime in LBTH was violent crime, with antisocial behaviour (ASB) the second highest reported crime. Hospital admissions for violence (including sexual violence) are higher than the regional (44.3 per 100,000 people) at 59.9 admissions per 100,000⁵⁸. **Figure D-5** shows the current crime breakdown for LBTH.

⁸⁹ Metropolitan Police Service (2023) Monthly Crime Data New Cats. Available at: <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>

⁹⁰ CrimeRate. Tower Hamlets Crime Statistics. Available online at: <https://crimerate.co.uk/london/tower-hamlets>

Figure D-5 - Crime Breakdown for Tower Hamlets January 2023⁹¹.



According to IMD19⁴³, LBTH is ranked 28th out of 317 local authorities nationally (where 1 is the most deprived), placing it within the top 10% of most deprived local authorities nationally. Of the 144 LSOAs in LBTH, 31 are in the top 10% and a further 72 are top 20% of most deprived neighbourhoods nationally. With regards to crime deprivation, 25% of the 120 LSOAs in LBTH are in the most deprived 10% of LSOAs in the UK.

The main focus of Tower Hamlets Community Safety Partnership Plan 2021-2024⁹² is to reduce crime and anti-social behaviour by working to prevent crime and disorder, address substance misuse, reduce reoffending, and support young and vulnerable people from being drawn into extremist behaviour. Community Safety Partnerships are a requirement of the Crime and Disorder Act 1998⁹³.

⁹¹ UK Crime Stats – Tower Hamlets 2023 [online] Available at: <https://www.ukcrimestats.com/Subdivisions/LBO/11185/>

⁹² Tower Hamlets Community Safety Partnership Plan 2021-2024 (2021) Available at: https://www.towerhamlets.gov.uk/lgnl/community_and_living/community_safety_crime_preve/anti-social_behaviour/community_safety_partnership/csp-plan.aspx

⁹³ Legislation.gov.uk, 1998. Crime and Disorder Act 1998. Available at: <https://www.legislation.gov.uk/ukpga/1998/37/contents>

Future Trends And Evolution Of The Baseline Without The Nlp

It is predicted that crime rates will likely increase post Covid-19⁹⁴, with increases in anti-social behaviour and violent crime rates, including sexual assault and domestic abuse, seeing the largest increases. The Council's Strategic Plan 2021-2026 (Priority 6: Empower Communities and Fight Crime) outlines that the LBTH will assist with more council-funded uniformed police officers to tackle crime.

As the population of LBTH increases, there are expected to be a greater number of vehicles on the borough's roads, which may result in an increase in the number of accidents and those KSI on roads. LBTH implements a number of road safety measures to support prevention of collision. These include⁹⁵:

- Providing road safety education in schools;
- Providing road safety information to members of the public;
- Promoting the children's traffic club;
- Running the junior road safety officers club; and
- Providing and managing the school crossing patrol service.

A new Local Plan could better support improvements to community areas and facilities to aid in reducing crime and anti-social behaviour and increase opportunities for community cohesion.

Issues and Opportunities

Issues and opportunities for crime and safety and the implications for the NLP have been identified in **Table D-6**.

Table D-6 – Issues and Opportunities for Crime and Safety

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There is potential to increase engagement within communities to encourage the reporting of crimes; 	<ul style="list-style-type: none"> ■ The NLP will need to ensure improvements to community areas to aid in reducing crime and anti-social behaviour;

⁹⁴ Office for National Statistics, 2022. Crime in England and Wales: year ending March 2022. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmar-ch2022>

⁹⁵ Tower Hamlets Council. Road Safety. Available online at: https://www.towerhamlets.gov.uk/lgnl/transport_and_streets/road_safety/road_safety.aspx

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour; ■ There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours; ■ As the population within LBTH increases there are expected to be a greater number of vehicles on the borough’s roads, which may result in an increase in the number of accidents and those KSI on roads; ■ Children in the most deprived neighbourhoods are nearly three times more likely to be KSI as a pedestrian compared to non-deprived neighbourhoods⁹⁶; ■ There are opportunities to increase the safety of active transport modes such as cycling and walking; ■ Vulnerable road users such as cyclists and pedestrians are more likely to be casualties; and ■ There is potential to increase the standards and safety of housing within the borough. 	<ul style="list-style-type: none"> ■ The NLP will need to ensure improvements to transport networks, including improving lighting, to ensure safety on networks; and ■ The NLP should seek opportunities to increase the safety of active transport modes such as cycling and walking.

⁹⁶ Centre for Transport Studies, Road Safety Research Briefing 1: Children and Traffic: Those in deprived areas still at disproportionate risk. Available online at: <https://www.ucl.ac.uk/transport/sites/transport/files/deprivation-and-road-safety-children.pdf>

Transport and Accessibility

Summary of Current Baseline

LBTH has excellent transport links and is a well-connected borough. The borough has access to the London Underground, Docklands Light Railway (DLR), National Rail connections, and the Elizabeth Line at Whitechapel and Canary Wharf stations. The DLR is a fully accessible railway, with stations having lift or ramp access to platforms. The borough has invested in making connections and access to stations more attractive, pleasant and easier to use⁹⁷.

Generally, the borough has relatively high Public Transport Accessibility Levels (PTALS). The southwest of the borough, in Spitalfields and Whitechapel, there are 'best' PTALS of 6b⁹⁸. Patchy areas traversing the north and south, in areas such as Bow, north of Poplar, and Isle of Dogs have lower PTAL outputs of 1a, indicating a lower rating by distance from frequent public transport services.

There is an extensive highways network throughout the borough, traversed by trunk roads such as the A11, A12 and A13 which carry large numbers of vehicles. The borough also benefits from 11km of cycle tracks along roads physically separated from traffic and pedestrians. There are about 53km of dedicated cycle routes in the borough (11km of which are physically separated from traffic and pedestrians) and 32.5km of pedestrian walkways⁹⁹.

LBTH is also within close proximity of major airports, including London City Airport (approx. 3.5 miles), London Heathrow (approx. 17 miles), and London Gatwick (approx. 25 miles).

As of 2021, there were approximately 45,768¹⁰⁰ registered cars in LBTH¹⁰¹, which represents an increase of +7.4% since 2019. The number of licenced vehicles in London also increased over this period, but by a greater percentage of +9.8%.

The borough is attempting to expand its electric vehicle (EV) charging infrastructure to support its net zero ambitions and air pollution reduction targets, along with associated health benefits. The demand for EVs in the borough is high and growing, making investment

⁹⁷ Tower Hamlets Council (2019) London Borough of Tower Hamlets Third Local Implementation Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=143901>

⁹⁸ Transport for London, WebCAT. Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

⁹⁹ Sustrans, Bike Life – Tower Hamlets, 2019 [online] available at: https://www.sustrans.org.uk/media/5954/bikelife19_tower-hamlets_web.pdf

¹⁰⁰ Vehicles are allocated to a local authority according to the postcode of the registered keeper. This is the keeper's address for privately owned vehicles or the company's registered address for company owned vehicles. The address does not necessarily reflect where the vehicle is located. This is especially true for large fleets kept by companies involved with vehicle management, leasing or rentals.

¹⁰¹ London Datastore (2021) Department for Transport, Licensed Vehicles - Type, Borough. Available at: <https://data.london.gov.uk/dataset/licensed-vehicles-type-0>

in the network paramount. Since 2018, LBTH have installed 23 fast charging points¹⁰², with the majority in the borough comprising Type 2 (5kW) chargers¹⁰³.

Despite LBTH having the third highest (66%) annual growth in EV registrations in inner London, the borough has the fourth highest (65%) of households more than 5 minutes walk from the nearest charger in inner London¹⁰⁴. There are evidently accessibility issues that need to be resolved to meet the needs of the growth of EVs in the borough.

The vast majority of jobs in LBTH are filled by non-residents and employees commuting from outside the borough, causing a major problem with congestion through LBTH. Excessive road traffic leads to congestion, air and noise pollution and contributes further to climate change. Provisional estimates show motor vehicles travelled 299.3 billion vehicle miles in Great Britain in 2021 which was 16.1% lower than pre Covid-19 levels (the year ending December 2019)¹⁰⁵. Government policy is focusing on promoting sustainable transport and encouraging walking and cycling for those journeys where these are realistic alternatives.

Since the Covid-19 pandemic the way people travel has changed, especially with 50.3% of people now working mainly at or from home¹⁰⁶. The borough has good levels of sustainable travel, with the borough coming 7th out of the London boroughs on the Healthy Streets Scorecard in 2022¹⁰⁷. The Healthy Streets Scorecard ranks London boroughs on how healthy their streets are according to ten indicators. However, this may change with the consultation on Low Traffic Neighbourhoods (LTNs) undertaken in January 2023 in the borough¹⁰⁸.

The most popular method of travel to work in LBTH is by train, underground, metro, light rail, or tram, with over 60.9% of residents using this mode of public transport¹⁰⁹. This is lower than the London average where 15.2% use this method of travel to work and may be the result of 42.1% of people working mainly at or from home. Comparing the most popular

¹⁰² [Electric vehicle charging in Tower Hamlets | Let's Talk Tower Hamlets](#)

¹⁰³ [Map of electric charging points for electric cars UK: Zapmap \(zap-map.com\)](#)

¹⁰⁴ Tower Hamlets Council. Charging Forward. Tower Hamlets electric vehicle delivery plan: 2021-2025. Available at: [Tower Hamlets electric vehicle delivery plan: 2021-2025 \(amazonaws.com\)](#)

¹⁰⁵ Department for Transport (2021) Provisional road traffic estimates, Great Britain: October 2020 to September 2021 Available at: [https://www.gov.uk/government/statistics/provisional-road-traffic-estimates-great-britain-october-2020-to-september-](https://www.gov.uk/government/statistics/provisional-road-traffic-estimates-great-britain-october-2020-to-september-2021#:~:text=Provisional%20estimates%20show%20motor%20vehicles,%2C%20an%20increase%20of%200.4%25)

[2021#:~:text=Provisional%20estimates%20show%20motor%20vehicles,%2C%20an%20increase%20of%200.4%25](https://www.gov.uk/government/statistics/provisional-road-traffic-estimates-great-britain-october-2020-to-september-2021#:~:text=Provisional%20estimates%20show%20motor%20vehicles,%2C%20an%20increase%20of%200.4%25)

¹⁰⁶ Office for National Statistics (2022) Travel to work, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkeinglandandwales/census2021>

¹⁰⁷ Healthy Streets Scorecard (2022) 2022 Scorecard results overview. Available at: <https://www.healthystreetscorecard.london/results/>

¹⁰⁸ Healthy Streets Scorecard (2022) Tower Hamlets. Available at: https://www.healthystreetscorecard.london/your_borough/tower-hamlets/

¹⁰⁹ Office for National Statistics (2020) Method of travel to work. Available at: [Method used to travel to work - Office for National Statistics \(ons.gov.uk\)](#)

method of travel to work in the borough to the national average indicates considerably lower proportions of people using train, underground, metro, light rail, or tram to travel to work, at 3.9% (-57%). The most popular method of travel to work in England is by driving a car or van, at 44.5%.

Although there are many dedicated cycle routes and pedestrian walkways in the borough, only 10.7% use bicycles or travel on foot to work (as of 2020), and only 11% of residents cycle at least once a week⁹⁹. Despite this, residents in the borough cycling each day takes up to 2,600 cars off the road, and there is ambition amongst the population to increase the use of this mode of transport, with 36% feeling they should cycle more⁹⁹.

Future Trends and evolution of the baseline without the NLP

During the Covid-19 pandemic homeworking has been encouraged for those who are able, leading to a short-term reduction in travel demand and increased financial pressure on the operators. This trend will likely continue as employers look to maintain flexible working conditions in future. In addition, peak periods for traffic congestion are likely to change with less people commuting for work. Public transport will need to adapt to these altered working and lifestyle patterns and encourage more passengers.

As the population in LBTH is becoming younger, and the majority of the population will continue to be of working age, there is likely to be additional demand on the borough's services and transport infrastructure. With public transport infrastructure already under stress with overcrowding and congestion, the transport industry will need to adapt meet the differing needs of this demographic change.

Transport must become accessible and affordable for all that live and work in the borough to reduce inequalities and meet Outcome 6 of the Tower Hamlets Transport Strategy 2019-2041¹¹⁰.

The borough has a commitment to become net-zero by 2045 or sooner through the Net Zero Carbon Partnership Action Plan¹¹¹. This will require modal shifts to active transport, to shift the dependency of commuters away from cars and public transport. LBTH Cycling Strategy endeavours to increase the proportion of residents cycling to work to 12 per cent by 2025¹¹².

As part of the council's and wider London's commitment to improving air quality the borough is situated within the Ultra Low Emission Zone (ULEZ) that operates 24 hours a day, seven

¹¹⁰ Tower Hamlets Council (2019) Tower Hamlets Transport Strategy 2019-2041. Available at: <https://democracy.towerhamlets.gov.uk/ieDecisionDetails.aspx?ID=7286>

¹¹¹ Tower Hamlets Council (2021) Net Zero Carbon Partnership Action Plan. Available at: <https://democracy.towerhamlets.gov.uk/ieDecisionDetails.aspx?Id=7524>

¹¹² Tower Hamlets Council (2016) Tower Hamlets – A Cycling Borough. Available at: https://www.towerhamlets.gov.uk/lgnl/transport_and_streets/cycling/cycling_strategy.aspx

days a week, every day of the year (except Christmas Day)¹¹³, which involves daily penalties for non-compliant vehicles.

To help meet this target, electric and hybrid vehicles are expected to become dominant (with the ban on new petrol and diesel car vehicle sales in the UK by 2035), requiring provisions such as electric charging points to be made for these vehicles across the borough.

Without the NLP transport improvements and developments will likely still come forward in the borough, due to the overarching Transport Strategy⁸⁰ and supplementary plans such as the Cycling Plan⁸². However, the NLP will enable the borough to better plan any necessary, large and small-scale improvements to its public transport and active travel networks and put in plan policies that support new developments and increasing demand.

Issues and Opportunities

Issues and opportunities for transport and accessibility and the implications for the NLP have been identified in **Table D-7**.

Table D-7 – Issues and Opportunities for Transport and Accessibility

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There is a need to improve sustainable transport modes (public and active) in line with LBTH’s commitment to reach net-zero GHG emissions by 2045; ■ Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs; ■ Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender; 	<ul style="list-style-type: none"> ■ There is a need to support the reduction of GHG emissions within the transport industry towards net-zero through the better provision of sustainable transport; ■ Site selection should account for future climate change, and consider locating transport infrastructure away from areas of high flood risk, or where road drainage may impact on water quality issues; ■ The NLP should maximise opportunities to integrate connected blue and green infrastructure along transport corridors;

¹¹³ Transport for London, Ultra Low Emission Zone. Available at: <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone>

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Changing work habits such as remote, internet-based jobs and working from home are likely to reduce transport demand; and ■ Health inequalities are prevalent in the borough, therefore reducing significant issues with traffic and congestion and subsequent air pollution is of utmost importance. 	<ul style="list-style-type: none"> ■ Improving availability, connectivity, reliability and affordability of public transport; and ■ There is a need to support greater access to services and facilities for the changing demographics.

Biodiversity and Natural Capital

Summary of Current Baseline

LBTH is a predominantly urban area and contains no internationally or European designated sites. There are numerous nationally designated sites within the greater London area, notably Site of Special Scientific Interest (SSSI), designated under the Wildlife and Countryside Act (1981)¹¹⁴, as amended. Gilbert's Pit (Charlton) SSSI in Greenwich is in closest proximity to LBTH, a geological SSSI covering 5.2Ha.

There are also the following European protected sites within 10km of the borough boundary:

- Special Protection Area (SPA): Lee Valley
- Ramsar Sites: Lee Valley
- Special Area of Conservation (SAC): Epping Forest

Lee Valley SPA is designated for Bittern (*Botaurus stellaris*), Gadwall (*Anas strepera*), and Shoveler (*Anas clypeata*). Lee Valley Ramsar Site is also designated for Gadwall and Shoveler, along with Water boatman (*Micronecta minutissima*) and Whorled water-milfoil (*Myriophyllum verticillatum*). All three bird species are list as amber on the Birds of Conservation Concern 5 (BoCC5)¹¹⁵, with Bittern showing a decreasing population trend on the IUCN Red List¹¹⁶.

¹¹⁴ Wildlife and Countryside Act 1981. Available at: <https://www.legislation.gov.uk/ukpga/1981/69/contents>

¹¹⁵ Stanbury, A. J. et al. (2021) The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. Available at: <https://www.bto.org/our-science/publications/birds-conservation-concern/status-our-bird-populations-fifth-birds>

¹¹⁶ IUCN Red List, The IUCN Red List of Threatened Species. Available at: <https://www.iucnredlist.org/en>

Epping Forest SAC supports Northern Atlantic wet heaths, European dry heaths, Atlantic acidophilous beech forests, and Stag beetle (*Lucanus cervus*) as qualifying habitats and species. All European designations within 10km of the borough boundary are legally underpinned by their respective SSSIs.

LBTH has an abundance of parks and open spaces which provide important habitat for wildlife, many of which are designated as Local Nature Reserves (LNRs). These include Tower Hamlets Cemetery Park, Ackroyd Drive, and Mudchute Park Farm, and cumulatively comprise an area of 25.78Ha.

The borough also has Sites of Importance for Nature Conservation (SINCs) which are London's equivalent of Local Wildlife Sites (LWSs) and are non-statutory designations. SINCs are identified in a four-tier system: Sites of Metropolitan Importance, Sites of Borough Importance (Grades 1 and 2) and Sites of Local Importance. There are 35 SINCs in LBTH¹¹⁷, benefitting from a high level of protection within the planning system, including:

- Six Sites of Metropolitan Importance;
- Four Sites of Borough Importance (Grade 1);
- 12 Sites of Borough Importance (Grade 2); and
- 13 Sites of Local Importance.

The habitat of LBTH is predominantly urban, however, there are a range of habitats in parks, cemeteries, waterways, brownfield sites, and gardens. There are also discrete sections of Priority Deciduous Woodland scattered across the borough. Epping Forest SAC woodland site is one of the best examples of Atlantic acidophilous beech forest in its UK range, and Lee Valley SPA / Ramsar wetland site is composed of a series of reservoirs and reedbed habitat.

The loss, fragmentation, and deterioration of natural habitats in the UK has caused a decline in the provision of many ecosystem services, with 41% of all UK species having declined since the 1970s¹¹⁸. Habitat loss has been prevalent for open mosaic habitats resulting from derelict sites being redeveloped, and the reason for the decline of species such as the House Sparrow (*Passer domesticus*) in the borough as well as London is largely unknown but could be attributed to habitat loss, pollution, predation and possibly disease¹¹⁹.

¹¹⁷ [Sites of importance for nature conservation \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

¹¹⁸ NBN (2019) State of Nature Report. Available at: <https://nbn.org.uk/stateofnature2019/reports/>

¹¹⁹ Tower Hamlets Council (2019) Tower Hamlets Local Biodiversity Action Plan 2019-2024. Available at: <https://www.towerhabitats.org/wp-content/uploads/2020/09/TowerHamletsLocalBiodiversityActionPlan2019-24.pdf>

According to the Natural Environment Valuation Online (NEVO) tool species richness data¹²⁰, LBTH has 32 species present in the current decade, out of 100 priority species chosen by the Joint Nature Conservation Committee (JNCC). These are broken down as follows:

- Plants – 14 out of 38 species;
- Invertebrates – 8 out of 25 species;
- Birds – 6 out of 17 species;
- Mammals – 4 out of 14 species;
- Lichen – 0 out 5 species; and
- Herptiles – 0 out of 1 species.

The NEVO tool also indicates that out of the 2,000ha comprising the borough, 80% of the land cover is urban, with only 0.9% consisting of semi-natural grassland or woodland.

Natural capital is a key theme in the Government's 25-year Environment Plan: A Green Future¹²¹. The UK's natural capital accounts show that approximately 20-25 million tonnes of carbon have been sequestered by vegetation in the UK each year between 2007 and 2015, while around 1.5 million tonnes of air pollutants have been removed each year. This equates to a monetary value of approximately £1.5 billion for carbon sequestration and £1 billion for pollution removal in 2015. By comparison, according to the NEVO tool, LBTH sequestered just 17 tonnes of CO₂ a year, equating to a monetary value of £113. Natural capital can play a significant part in mitigating the effects of emissions and climate change.

The important role of natural capital is also prevalent for London, with London's public green spaces having a gross asset value of more than £91 billion, providing services valued at £5 billion per year¹²². The total value of publicly accessible greenspace in LBTH is £2.0 billion, with associated benefits in carbon storage (£0.11 million) and temperature regulation (£20 million)¹²³.

Green Infrastructure (GI) provides a strategically planned network of nature and semi-natural areas, designed, and managed to deliver ecosystem services, and provides a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. GI in LBTH includes parks and playing fields, nature reserves and natural

¹²⁰ University of Exeter, NEVO, [online] available at: <https://www.exeter.ac.uk/research/leep/research/nevo/>

¹²¹ Defra (2018) 25 Year Environment Plan. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

¹²² Mayor of London (2017) Natural capital accounts for public green space in London: Report prepared for Greater London Authority, National Trust and Heritage Lottery Fund. Available at: [11015viv_natural_account_for_london_v7_full_vis.pdf](https://www.london.gov.uk/asset-upload/11015viv_natural_account_for_london_v7_full_vis.pdf)

¹²³ Mayor of London (2017) Natural capital accounts for public green space in London: Local authority summaries. Available at: [11015viv_nca_by_borough.pdf](https://www.london.gov.uk/asset-upload/11015viv_nca_by_borough.pdf) (london.gov.uk)

habitats, and allotments and urban greening. However, due to the urban density of the borough there is a sense of open space deficiency.

In addition to GI, the borough has a substantial amount of blue infrastructure (BI) which can provide important habitats and ecosystem services. Key areas include Millwall Outer Dock, South Dock, Blackwell Basin, Poplar Dock Marina, North Dock, Limehouse Basin and the River Lea. Combining blue and green Infrastructure (BGI) elements together is an effective way of providing a sustainable natural solution to urban and climatic challenges.

Urban greening is measured using the Urban Greening Factor (UGF) tool which evaluates both quality and quantity of proposed urban greening. This system will enable LBTH to comply with Policy G5 Urban Greening of the London Plan **Error! Bookmark not defined.**, making the urban greening required for a development measurable.

The Tower Hamlets Green Grid Strategy¹²⁴ aims to create a framework for the design and delivery of appealing walking routes and associated GI across the borough. This strategy is essential to reduce the sense of open space deficiency, with the borough having less than the local open space standard of 1.2 hectares per 1,000 residents¹²⁵. Design considerations for interventions which respect the local character and are designed to be low maintenance will enable the benefits of GI to be maximised in the future. The purpose of the Parks and Open Space Strategy 2017-2027¹²⁶ is:

- Managing the impact of population growth on the provision of open spaces;
- Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets;
- Contributing to sustainable development;
- Addressing competing demands on parks and open spaces; and
- Mitigating the revenue costs for the council of providing parks and open spaces in Tower Hamlets.

Future Trends and evolution of the baseline without the NLP

The 2019 State of Nature Report¹¹⁸ highlights the general decrease in biodiversity in the UK. Since 1970, species abundance has decreased by 13% and species distribution has decreased by 5%. Of the 8,431 species that have been assessed using the International

¹²⁴ Land Use Consultants (2017) Tower Hamlets Green Grid Strategy: Update 2017. Available at: [Tower Hamlets Green Grid Strategy: Update](#)

¹²⁵ LUC (2016) Tower Hamlets Open Space Audit

¹²⁶ Parks and Open Spaces: An open space strategy for the London Borough of Tower Hamlets 2017-2027. Available at: [170904_CAB_submission \(towerhamlets.gov.uk\)](#)

Union for Conservation of Nature (IUCN) Regional Red List criteria, 15% are currently threatened with extinction from Great Britain and 2% are already extinct.

Rising population and urbanisation of natural areas can further exacerbate habitat fragmentation and decreases in biodiversity. Species distribution may shrink in LBTH if developments continue to separate habitat corridors connecting the LNRs, specifically Tower Hamlets Cemetery Park and Ackroyd Drive. There are a number of areas which are considered to be deficient in nature, a trend that could continue to rise. This highlights the need for green spaces.

Climate change presents another threat to ecosystem services and biodiversity. Current IPCC¹²⁷ predictions for temperature increases are expected to be 2°C by the middle of the 21st century. This increase in temperature is expected to lead to increases in flooding events and northward colonisation of species in the UK. Increased flooding will need to be mitigated, especially as large parts of LBTH are situated within a flood risk zone 3. In order to preserve biodiversity and natural habitats, soft engineering and nature-based solutions will need to be used over traditional hard engineering.

The Environment Act¹²⁸ specifies a mandatory 10% increase in biodiversity net gain (BNG) for new developments. This will apply from January 2023 for developments¹²⁹ that fall under the Town and Country Planning Act 1990¹³⁰. Biodiversity on development sites will need to be preserved, with additional mitigation put in to increase biodiversity. This increase in biodiversity may be provided on site enhancement, or through off-site compensation.

As part of the LBTHs Net Zero Carbon Plan¹³¹ in response to declaring a climate emergency, the following ambitions relevant to biodiversity and natural capital were identified:

- 2025: Average UGF of 0.3
- 2035: Average UGF of 0.4
- 2050: Average UGF of 0.4

The council has identified that it is not possible to plant enough trees to meaningfully offset total emissions, so as many trees as possible should be planted¹³². Trees that are planted

¹²⁷ IPCC (2022) Climate Change 2022: Impacts, Adaptation and Vulnerability. Available at: <https://www.ipcc.ch/report/ar6/wg2/>

¹²⁸ Environment Act (2021). Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

¹²⁹ Unless exempt. The law will apply to small developments from April 2024.

¹³⁰ [Town and Country Planning Act 1990 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1990/19/contents)

¹³¹ Tower Hamlets Council (2020) Net Zero Carbon Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=165906>

¹³² London Borough of Tower Hamlets, Net Zero Carbon Plan, 2020, [online] available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=165906>

must be diverse and native species. LBTH would need further reductions in emissions from forestry in other local authorities, potentially through a future national trading scheme.

London is implementing a Rewild London Fund 2022¹³³, providing £850,000 of funding to create new habitats in line with London Environment Strategy¹³⁴ targets, with local authorities eligible to apply for funding to support projects.

The Tower Hamlets Local Biodiversity Action Plan (LBAP)¹¹⁹ sets out a series of actions for the built environment, gardens and grounds, rivers and standing water, and parks, squares and burial grounds. The LBAP identifies priority habitats and species in the borough, and sets objectives and, where appropriate, targets for what needs to be done to ensure their conservation and inform the implementation of future projects and actions.

It is clear that there are a number of ongoing initiatives and plans within the borough that will help to conserve and enhance biodiversity and natural capital and which would be expected to continue without the NLP. However, there is potential that without the NLP some sites and habitats could be threaten by development in inappropriate locations. The NLP may also provide opportunities to increase biodiversity and natural capital assets.

Issues and Opportunities

Issues and opportunities for biodiversity and natural capital and the implications for the NLP have been identified in **Table D-8**.

Table D-8 – Issues and Opportunities for Biodiversity and Natural Capital

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas, notably the European designations; ■ Increasing population and developments may result in worsening air quality that may degrade the borough’s valuable ecological receptors; ■ Development adjacent to watercourses are expected to contribute to achieving Water 	<ul style="list-style-type: none"> ■ Developments will need particular attention to potential environmental impacts. ■ Development and site allocation of the new NLP will need to include stringent standards for the protection and enhancement of biodiversity and natural capital. ■ The NLP should look to develop new green spaces to support the

¹³³ London.gov.uk (2022) Rewild London Fund 2022. Available at: <https://www.london.gov.uk/publications/rewild-london-fund-2022>

¹³⁴ Mayor of London (2018) Greater London Authority, London Environment Strategy. Available at: https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf

Key Risks/Opportunities	Implications for the NLP
<p>Framework Directive objectives relating to ecological status; this includes connectivity for fish and removal of invasive species;</p> <ul style="list-style-type: none"> ■ New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity, including consideration of watercourses from the start of the design process in order to maintain the increase in biodiversity over the statutory 30 year period. Developments that seek to create habitat to support species identified as declining should be prioritised; and ■ The inclusion of BGI can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island (UHI) effects and help to make developments more climate resilient, especially when it comes to flood mitigation. 	<p>borough's growing population and reduce open space deficiency.</p> <ul style="list-style-type: none"> ■ The NLP should prioritise the connection of green spaces in the borough by implementing green corridors to improve GI. ■ The NLP will need to encourage development opportunities to remove in-channel structures when present within the watercourse, the use of hard engineering should require strong justification; ■ The NLP will need to address plans for flood mitigation. Creation and use of nature-based solutions and ecosystems services for flooding can be included. ■ The NLP should establish guidelines for biodiversity net gain to support developers

Landscape and Townscape

Summary of Current Baseline

Landscape and townscape is the visual aesthetic of the natural or built environment. The landscape takes its character from a combination of elements, including topography, watercourses, land use and pattern, vegetation, open space, and cultural heritage features. The topography of the borough is generally flat along the river front to the south, with some sections of the Isle of Dogs at sea level or below (< 0m)¹³⁵. The elevation of the land increases towards the northwest and at discrete locations such as Canary Wharf (up to 39m). The average elevation in the borough is 9m.

¹³⁵ [London Borough of Tower Hamlets topographic map, elevation, terrain \(topographic-map.com\)](#)

LBTH is predominantly urban; however, there are over 200 parks and greenspaces within the borough, and 170 are publicly accessible, most notably Victoria Park and Mile End Park. Victoria Park is the borough’s largest park, covering over 80Ha¹³⁶.

Metropolitan Open Land (MOL) is strategic open land within the urban area, afforded the same level of protection as the Green Belt. Despite there being no designated Green Belt land within the borough, 7.6% of LBTH is MOL¹³⁷. These designations restrict development to heavily developed areas in LBTH.

LBTH falls within two of Natural England's National Character Areas (NCAs)¹³⁸. These are defined in **Table D-9** below.

Table D-9 – National Character Areas within Tower Hamlets

NCA	Description
81: Greater Thames Estuary	<ul style="list-style-type: none"> Predominantly a remote and tranquil landscape of shallow creeks, drowned estuaries, low-lying islands, mudflats and broad tracts of tidal salt marsh and reclaimed grazing marsh that lies between the North Sea

¹³⁶ [BoroughProfileEnvironment.pptx \(live.com\)](#)

¹³⁷ RCKa. Small Sites in London: London Borough of Tower Hamlets. Available at: [RCKa Small Sites: London Borough of Tower Hamlets – RCKa: Small Sites](#)

¹³⁸ Natural England (2014) Corporate report: National Character Area profiles. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

NCA	Description
	<p>and the rising ground inland.</p> <ul style="list-style-type: none"> • It forms the eastern edge of the London Basin and encompasses the coastlines of South Essex and North Kent, along with a narrow strip of land following the path of the Thames into East London. • There are busy urban and industrial areas towards London where population density is high and development pressures are increasing. Historic military landmarks are characteristic features of the coastal landscape.

NCA	Description
112: Inner London	<ul style="list-style-type: none"> • Predominantly urban and lies at the centre of the Thames Basin on a broad flood plain which rises in gentle terraces, providing panoramic views of London’s skyline from the clay plateaux and ridges in the north at the border with the Northern Thames Basin. • The NCA is steeped in both historical and contemporary culture; it is the centre of UK Government and a major international hub for finance, business, tourism, transport and

NCA	Description
	<p>recreation. Owing to its urban nature, Inner London relies heavily on ecosystem services provided by the surrounding NCAs, such as flood alleviation, air temperature regulation and recreational services. For example, the Thames Barrier in the Greater Thames Estuary is a major tidal flood defence for London. However, the extensive network of green infrastructure throughout the NCA provides outdoor recreation and wildlife habitat close to people's</p>

NCA	Description
	<p>homes and places of work.</p> <ul style="list-style-type: none"> Reservoirs and wetlands such as the Lea Valley in the east provide opportunities for birding and fishing, as well as walking, cycling and boating. water-based activities are provided along the Thames and its tributary rivers. Parks and green spaces scattered among the built environment provide highly valued pockets of perceived tranquillity. Nevertheless, many communities in London

NCA	Description
	<p>suffer a shortage of green space close to where they live. The Thames Path National Trail also provides extensive walking opportunities following the river together with strategic walking routes such as the Capital Ring and the Jubilee Walkway.</p>

The Green Flag Award® is a non-profit international accreditation programme that recognises and rewards well managed parks and green spaces¹³⁹, and 13 of the borough’s parks benefit from such award. The London in Bloom campaign have also provided nine gold awards to the borough, with the borough awarded the ‘City’ category for 2022¹⁴⁰.

Townscape includes the buildings and the activities and spaces between them, with the public realm an important feature of the townscape. Views are considered as intrinsic to local character, and London Boroughs are required to designate local views and landmarks. The London View Management Framework SPG¹⁴¹ identifies the silhouette of Canary Wharf as a recognisable feature in numerous panoramic views of London and is designated as a “Skyline of Strategic Importance”. There are a total of 39 landmarks and 92

¹³⁹ Green Flag Award (2023) Available at: <https://www.greenflagaward.org/#>

¹⁴⁰ London In Bloom (2023) <https://londoninbloom.co.uk/>

¹⁴¹ Mayor of London (2012) London View Management Framework. Available at: [London View Management Framework | London City Hall](#)

views identified in conservation area appraisals and management guidelines for the borough¹⁴².

LBTH includes some of London's destination high streets including Columbia Road Flower Market, Brick Lane's curry houses, Bethnal Green's craft beer pubs and night life, Whitechapel's growing transport and civic hub and the rich East End history linked to Chrisp Street and Roman Road¹⁴³. Town centres are the economic, transport, social and civic hearts of the borough, with the borough having eight district centres:

- Bethnal Green
- Brick Lane
- Chrisp Street
- Middlesex Street
- Roman Road East
- Roman Road West
- Watney Market
- Whitechapel
 - The borough has number of major tourist attractions which include:
 - The Museum of London Docklands;
 - The Tower of London;
 - Tower Bridge;
 - Canary Wharf;
 - Victoria Park; and
 - Whitechapel Gallery.

Future Trends and evolution of the baseline without the NLP

Landscape and townscape character and quality is under particular threat from future development through, for example, loss of tranquillity, increased lighting, visual intrusion and the incremental loss of landscape features and characteristic elements.

¹⁴² Tower Hamlets Council (2018) Local Plan Topic Paper D.DH4 Managing and Shaping Views. Available at: [Topic Paper Views and Landmarks 2018.pdf \(towerhamlets.gov.uk\)](#)

¹⁴³ Tower Hamlets Council. Tower Hamlets High Streets & Town Centres Strategy 2017 – 2022. Available at: [6.6a%20-%20App1%20-%20High%20Streets%20Town%20Centre%20Strategy%202017-2022.pdf \(towerhamlets.gov.uk\)](#)

Similarly, pressures from expanding populations put more strain on existing systems, and more pressure on recreational landscapes and tourist attractions.

Growth will also increase the demand for open spaces, and place challenges on LBTH to meet this demand, especially when faced with the current financial pressures experienced nationwide. Despite this, residents will need access to high quality open space, increasing the provisions required.

The Parks and Open Space Strategy 2017-2027 acknowledges the need to attract investment for the borough’s increasing demand for open space¹⁴⁴.

Without a NLP there may be reduced opportunities for new development to enhance and support the local landscape and townscape character through, quality design, provision of green infrastructure and/or habitat creation.

Issues and Opportunities

Issues and opportunities for landscape and townscape and the implications for the NLP have been identified in **Table D-10**.

Table D-10 – Issues and Opportunities for Landscape and Townscape

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Development has the potential to cause direct and indirect impacts on designated landscapes and townscapes, affecting the character and sense of place; ■ Future growth could risk compromising landscape and townscape character and features. However, design that incorporates public realm and GI principles could play a key role in the enhancement of the natural environment, visual amenity and physical and mental health of the borough’s people; ■ There is opportunity to increase greenspace access and subsequently, to improve health and wellbeing, combat air pollution, provide 	<ul style="list-style-type: none"> ■ The NLP must consider the setting of landscape and townscape assets and tourist destinations, ensuring development enhance setting. ■ The NLP must consider the importance of landscape and townscape character when outlining options, ensuring development does not erode the quality and key characteristics of the landscape and townscape, and instead respects it. ■ The NLP must protect the views that comprise the urban skyline, including the visibility of important

¹⁴⁴ Tower Hamlets Council (2017) Parks and Open Spaces: An open space strategy for the London Borough of Tower Hamlets 2017-2027. Available at: https://www.towerhamlets.gov.uk/lgn/leisure_and_culture/parks_and_open_spaces/open_space_strategy.aspx

Key Risks/Opportunities	Implications for the NLP
<p>storm water management and reduce flooding (contributing to climate change adaptation and mitigation) and provide connectivity through urban built form to the countryside for wildlife. It can also bring new audiences to tourist attractions and enable better appreciation of historic landscape assets through creating new views and vistas, providing information and enhancing access</p>	<p>landmarks, to comply with requirements for tall buildings and respect the unique visual amenity of the borough’s setting.</p> <ul style="list-style-type: none"> ■ To NLP must develop better contextual townscape design to enable new developments of greater density than existing to integrate and reflect the borough’s special character. ■ The NLP may seek to enhance the setting of its landscape and townscape assets and increase urban greening. ■ The NLP may consider encouraging the public use of green spaces and encourage preservation of assets.

Historic Environment

Summary of Current Baseline

LBTH possesses a great diversity of heritage assets of international to local importance and priority. The borough takes its name from the historical association with the Tower of London and the surrounding hamlets, characterised by a long history of maritime and trade activity, and migration and change. LBTH has a comprehensive strategy for regeneration and enhancement of such heritage assets¹⁴⁵.

Heritage assets make a significant contribution to the quality of life for those living, working or visiting LBTH. There are a number of designated assets throughout LBTH¹⁴⁶, including:

- Two World Heritage Sites;
- Nine Scheduled Monuments;

¹⁴⁵ Tower Hamlets Council (2017) Conservation Strategy 2017-2027. Available at: https://www.towerhamlets.gov.uk/lgn/planning_and_building_control/conservation_and_urban_design.aspx

¹⁴⁶ Historic England - Search the list. Available at: <https://historicengland.org.uk/>

- 13 Grade I Listed Buildings;
- 40 Grade II* Listed Buildings;
- 2,000 Grade II Listed Buildings¹⁴⁷;
- 210 Locally Listed Buildings;
- 58 Conservation Areas; and
- Five Registered Parks and Gardens.

The Tower Hamlets Local List identifies locally important heritage assets that are valued by the local community, these are also referred to as non-designated heritage assets (visible, buried or submerged). Although not designated, these assets are material planning considerations and the NPPF and draft policies contain references to them. There are currently 210 locally listed buildings and 44 locally listed war memorials within the borough.

The Greater London Historic Environment Record (GLHER)¹⁴⁸ is a comprehensive and dynamic resource for the historic environment of Greater London, with data supporting the work of the Greater London Archaeological Advisory Service (GLAAS). The record contains over 87,000 entries, with 1,122 of these in LBTH.

The two designated World Heritage Sites were designated by UNESCO for their 'Outstanding Universal Value', which have been inscribed on the World Heritage List by the World Heritage Committee. World Heritage Status is a high accolade that brings international scrutiny. The designated World Heritage Site's situated partially or wholly within the borough, and occupying buffer zones, are:

- Tower of London World Heritage Site, The Tower of London (inscribed 1988)
- Maritime Greenwich World Heritage Site, Island Gardens (inscribed 1997)

Historic England's Heritage at Risk (HAR)¹⁴⁹ programme helps to understand the overall state of England's heritage sites. It identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. In LBTH, there are 36 assets on the HAR register; one Scheduled Monument, five Conservation Areas, 24 Grade II listed buildings, four Grade II* listed buildings, and two Grade I listed buildings.

Historic England provides specific guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes, set against the background of the National Planning Policy Framework (NPPF)

¹⁴⁷ Grade I Listed Buildings are of exceptional interest. Grade II* Listed Buildings are particularly important buildings of more than special interest. Grade II buildings are of special interest.

¹⁴⁸ Greater London Historic Environment Record (GLHER) Available at: <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-historic-environment-record/#Online>

¹⁴⁹ Heritage at Risk (2022) Available at: <https://experience.arcgis.com/experience/cb50293b60cd42e98f7d312cec9115a9/>

and the related guidance given in the Planning Practise Guide (PPG). In addition to the visual setting, 'setting' can also include intangible such as sound, smells, and historic associations / relationship

An Archaeological Priority Area (APA) is a defined area where, according to existing information, there is significant known archaeological interest or potential for new discoveries¹⁵⁰. All parts of the borough fall into one of four different tiers of archaeological significance and potential (Tier 1-3 constituting an APA, and Tier 4 outside an APA). There are a total of 31 APAs in the borough, of which six are Tier 1 APA, 23 are Tier 2 APAs and two are Tier 3 APAs, cumulatively covering approximately 74% of the borough¹⁵¹.

Future Trends and evolution of the baseline without the NLP

Protection of the historic environment is firmly embedded in national and local policy, and this has been the case since 1990. This policy has developed independently of the European Union and is unlikely to change with the Retained EU Law Bill. However, whilst harm to the significance of heritage assets is largely restricted, harm to the setting of heritage assets still occurs; for example, relating to visual intrusion, or aspects such as traffic, lighting, and noise. This can be a sensitive planning issue.

One trend over the last few years which may well continue, is the reduction in funding for Historic England and county and local authorities, with increased pressure on the case workload of Archaeological Officers, Conservation Officers, and Historic England advisors. This can have an impact on the response times for the provision of planning advice.

The reduction in funding for Historic England also has an impact on the number of and the scale of grants for the Historic Environment, this includes to grants to heritage assets at risk. Therefore, these heritage assets likely to see a decline in their preservation, and an increase in heritage at risk that is lost.

The number of vehicles on the roads is likely to increase as the borough's population rises, increasing air pollution and road traffic. This has the potential to harm the settings of World Heritage Sites, listed buildings, scheduled monuments and parks and gardens, as well as conservation areas.

Expansion of roads and the development of new residential and commercial areas, to accommodate the increased number of private vehicles, road traffic, and population increase, will put pressure on land space and could result in land take from heritage assets. Depending on the scale and nature of land take, as this may harm both the setting and characteristics of assets.

¹⁵⁰ [Greater London Archaeological Priority Areas | Historic England](#)

¹⁵¹ Historic England (2017) London Borough of Tower Hamlets: Archaeological Priority Areas Appraisal. Available at: <https://historicengland.org.uk/content/docs/planning/apa-tower-hamlets-pdf/>

Climate change also poses a risk of harm to heritage assets, their characteristics, and settings, particularly through increased flooding, extreme heat events, and changes to energy requirements. Historic England have outlined guidance to achieving net zero targets and adapting the heritage environment to climate change – this is focussed on reusing UK homes built before 1919 (approximately 20% of the UK’s housing resource) and adapting their energy needs¹⁵².

Protection of the historic environment is likely to be maintain through existing local, regional and national plans and policies, however without the NLP there may be reduced opportunities for new development to enhance and support the local heritage character and strike the right balance between protection and enhancement the need for development.

Issues and Opportunities

Issues and opportunities for the historic environment and the implications for the NLP have been identified in **Table D-11**.

Table D-11 – Issues and Opportunities for Historic Environment

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active modes and asset settings; ■ Trans-boundary matters should be noted and the impact that development in LBTH may have on heritage in other boroughs; ■ There is potential for development to encroach on assets and their settings, particularly through land take, increased noise and visual effects. Although damage to the significance and setting of assets from development is not limited to these factors; Archaeological remains, whether designated or not, can require preservation in situ. This clearly has implications and can represent a 	<ul style="list-style-type: none"> ■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active forms of transport. ■ The NLP should preserve and enhance the current settings of heritage assets, both designated and non-designated. ■ The NLP must consider the importance of local historic character when outlining options, ensuring that development doesn't erode the quality and key characteristics of assets.

¹⁵² Historic England, 2022. Climate Change: Mitigation, Adaptation and Energy Measures. [online] Available at: <https://historicengland.org.uk/whats-new/features/climate-change/>

Key Risks/Opportunities	Implications for the NLP
<p>significant constraint to future scheme design, which should respect, retain and protect the remains (e.g. through avoidance and redesign); and</p> <ul style="list-style-type: none"> Vehicle damage and pollution can adversely affect World Heritage Site’s, listed buildings and scheduled monuments, so reducing vehicle movements within historic areas is also important to address. 	<ul style="list-style-type: none"> The NLP should include measures to minimise climate change impacts on the historic environment. The NLP should ensure that development adjacent, or in close proximity to the local conservation areas, designated assets, archaeological remains or listed buildings, respects their character and setting, and does not detract from the quality of the built environment.

Water Environment

Summary of Current Baseline

The borough falls within the Thames River Basin District, and the London Management Catchment. The Lee Lower Rivers and Lakes Operational Catchment feeds into the Lee (Tottenham Locks to Bow Locks/Three Mills Locks) Water Body. This is a heavily modified water body and has a catchment area of 45.185 km¹⁵³, with the River Lee Navigation draining into Limehouse Basin.

The Water Framework Directive (WFD)¹⁵⁴ sets an objective of aiming to achieve at least ‘good’ status for all waterbodies by a set deadline specific for each waterbody. Most of the monitored waterbodies are ‘main rivers’ that are under the jurisdiction of the Environment Agency. **Table D-12** below show the water quality (ecological and chemical) of the 27 waterbodies in the Lee Lower Rivers and Lakes Operational Catchment for the 2019 Cycle 3.

Table D-12 – Water quality (ecological and chemical status) of the Lee Lower Rivers and Lakes Operational Catchment¹⁵³

¹⁵³ Environment Agency. Catchment Data Explorer - Thames River Basin District. Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/6>

¹⁵⁴ Department for Environment, Food & Rural Affairs (2014) Water Framework Directive implementation in England and Wales: new and updated standards to protect the water environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf

Operational Catchment	Classification							
	Ecological Status					Chemical Status		
	Total Water Bodies	High	Good	Moderate	Poor	Bad	Fail	Good
Lee Lower Rivers and Lakes	27	0	1	16	9	1	27	0

Of the 27 water bodies, just one has 'good' ecological status, falling far short of the WFD target of 100%. The percentage of waterbodies achieving 'moderate' status was 59.3%, whilst 37.0% were 'poor' or 'bad' status. All water bodies failed based on their chemical status.

The Lee (Tottenham Locks to Bow Locks/Three Mills Locks) Water Body is the only water body in the operational catchment achieving 'bad' ecological status. It is also 'high' for all specific pollutants, including Arsenic (As) and Copper (Cu).

The reasons for not achieving good (RNAG) is predominantly due to urban development associated with urban and transport, sewage discharge by the water industry, use of restricted substance by navigation, and misconnections by the domestic general public.

The WFD also includes groundwater water bodies, with the objective of achieving 'good' quantitative and chemical status. The borough contains one such groundwater body, Greenwich Tertiaries and Chalk, which currently has 'poor' chemical and quantitative classification.

The Thames River Basin Management Plan (2021-2027)¹⁵⁵, developed in 2009 and updated in 2022, is required if 93.6% of surface waters in England are to achieve 'good or better' ecological status by 2027 or beyond¹⁵⁶.

National flood zone data correlates with the location of main rivers and ordinary watercourses as areas with the greatest risk of flooding. The government's flood map¹⁵⁷ for planning shows that a sustainable portion of the borough lies within in flood risk zone 3, meaning it has a high probability of flooding. The borough has almost 37,000 properties located within areas defined as being at risk of flooding, with the potential risk of flooding from other (non-river related) sources including sewer surcharge and surface water flooding as a result of heavy rainfall prevalent. Areas of the borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate other sources of flood risk¹⁵⁸.

The LBTH Local Flood Risk Management Strategy¹⁵⁹ identifies critical drainage areas (CDAs) that are predicted to be at an increased risk of flooding relative to the rest of the borough. Due to large parts of the borough being urbanised and well developed, and the limited capacity of the sewer system, surface water flooding is thought to pose the most significant risk. The Isle of Dogs is one area of high-level flood risk as a result of its low-lying topography.

Future Trends and evolution of the baseline without the NLP

In terms of water quality, the requirements of the WFD should lead to continued improvements to water quality in watercourses. However, water quality is also likely to continue to be affected by pollution incidents in the area; runoff from urban and transport; the presence of non-native species; and physical modifications to water bodies.

Meeting water supply demand over the next 25 years will be challenging in London. Deficits may develop across England by the 2050s due to climate change alone; these would be exacerbated by population growth.

At a regional level, the future implications of climate change projections include increased surface water and fluvial flooding leading to damage to property and disruption to economic

¹⁵⁵ Environment Agency (2022) Thames river basin district river basin management plan: updated 2022. Available at: <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022>

¹⁵⁶ Environment Agency (2022) River basin management plans updated 2022: progress report. Available at: <https://www.gov.uk/government/publications/river-basin-management-plans-updated-2022-progress-report/river-basin-management-plans-updated-2022-progress-report>

¹⁵⁷ Environment Agency, Flood Map for Planning. Available at: <https://flood-map-for-planning.service.gov.uk/>

¹⁵⁸ Environment Agency and Tower Hamlets Borough Resilience Forum (2017) London Borough of Tower Hamlets: Multi-Agency Flood Plan v1.0. Available at: [LBTH_MAFP_Sept_17 \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk/Documents/Environmental-protection/Monitoring/Local_Flood_Risk_Management_Strategy.pdf)

¹⁵⁹ Tower Hamlets Council (2017) Local Flood Risk Management Strategy: London Borough Tower Hamlets 2016-2022. Available at: https://www.towerhamlets.gov.uk/Documents/Environmental-protection/Monitoring/Local_Flood_Risk_Management_Strategy.pdf

activity; water shortages; and higher incidence of damage to transportation, utilities, property and communications infrastructure caused by an increase in the number of extreme weather events (e.g., heat, high winds, and flooding). It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within the borough.

A NLP presents opportunities to provide a targeted approach to addressing flood risk and water quality issues. It could support sustainable urban drainage systems (SUDs) and GI requirements within new developments in order to adapt to climate change and counteract flood risk.

Issues and Opportunities

Issues and opportunities for the water environment and the implications for the NLP have been identified in **Table D-13**.

Table D-13 – Issues and Opportunities for the Water Environment

Key Risks/Opportunities	Implications for the NLP
<p>Water quality</p> <ul style="list-style-type: none"> ■ The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat; ■ Of the 27 waterbodies in the borough, just 3.7% are achieving ‘good’ status, falling far short of the WFD target; and ■ Upgrading existing infrastructure provides the opportunity to improve pollution control. <p>Flood risk</p> <ul style="list-style-type: none"> ■ Increased development near a watercourse (including transport, housing and other infrastructure) can increase flood risk on a local and catchment scale; ■ Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the 	<p>Water quality</p> <ul style="list-style-type: none"> ■ The NLP should promote that development in close proximity to a watercourse should include the addition of naturalised features to buffer zones to connect the river to the riparian zone, create natural flood management (NFM) schemes, and promote biodiversity. ■ The NLP should seek to protect groundwater quality as a water resource. <p>Flood risk</p> <ul style="list-style-type: none"> ■ The NLP should undertake a new Strategic Flood Risk Assessment (SFRA) and Flood Risk Management Strategy to address new challenges and mitigate against risk of flooding in the borough. These can also provide an evidence base to support the NLP.

Key Risks/Opportunities	Implications for the NLP
<p>already stressed capacity of sewer systems; and</p> <ul style="list-style-type: none"> ■ Climate change is likely to increase the occurrence of flooding from all sources and hence raise the flood risk in LBTH, in addition to existing residual flood risk in the event of a breach or failure of the flood defences. 	<ul style="list-style-type: none"> ■ The NLP should ensure that development in close proximity to a watercourse should include provision of natural, undeveloped buffer zones. These can help contribute to natural flood management (NFM) whilst also allowing access for maintenance and emergency works. ■ The NLP should seek to incorporate sustainable urban drainage systems (SUDs) and GI requirements within new developments in order to adapt to climate change and counteract flood risk. GI can also reduce surface water runoff and have water quality co-benefits. ■ The NLP should critically assess the resilience of Thames flood defences to sea level rise under different climate scenarios. The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames.

Air Quality

Summary of Current Baseline

Air quality plays an important role in human health. Poor air quality can have large impacts on health through short term exposure, but particularly through long term exposure. According to the World Health Organisation (WHO), air quality is one of the greatest environmental risks to human health. Reducing air pollution can result in reductions in stroke, heart disease, lung cancer, and both chronic and acute respiratory diseases,

including asthma¹⁶⁰. In 2019, 99% of the world's population were living in places where the WHO air quality guidelines were not met, and that ambient air pollution caused 4.2 million premature deaths worldwide in that year. Major pollutants include nitrous oxide (NO_x), nitrogen dioxide (NO₂) and particulate matter (PM).

Poor air quality also contributes to the deterioration of ecological receptors. Ecosystems are negatively impacted by air pollution, particularly emissions such as sulphur and nitrogen, as it affects their ability to function and grow¹⁶¹.

LBTH has higher levels of air pollution compared to the UK overall¹⁶². The average annual mean for nitrogen dioxide in the majority of the borough is 21 – 30 µg m⁻³. In some parts of the borough the average annual mean is 41 – 50 µg m⁻³, exceeding the UK air quality objective (AQO)¹⁶³ of 40 µg m⁻³. The average annual mean for nitrogen oxides are between 31 – 40 µg m⁻³ and 41 – 60 µg m⁻³, exceeding the UK AQO of 30 µg m⁻³. The borough does not exceed the AQO for either PM₁₀ or PM_{2.5}.

Local authorities must declare areas that are not likely to achieve national air quality objectives as Air Quality Management Areas (AQMAs). The whole borough sits within the Tower Hamlets AQMA which was designated in 2000 for PM₁₀ (24-Hour Mean) and NO₂ (Annual Mean)¹⁶⁴. The source of pollution is transport and industry.

The borough is situated within the London Ultra Low Emission Zone (ULEZ) which operates 24 hours a day, every day of the year, except Christmas Day (25 December). The high levels of pollutants in the borough are of particular concern due to their impacts on human health, especially as in 2019 it was estimated that between 88 and 97 deaths were attributable to human made NO₂ and PM_{2.5} air pollution exposure¹⁶⁵. LBTH's Air Quality Action Plan (AQAP) 2022-2027¹⁶⁶ is being implemented to address ongoing poor air quality throughout the borough.

¹⁶⁰ WHO (2022) Ambient (outdoor) air pollution. Available at: [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

¹⁶¹ UNECE. Air Pollution, Ecosystems and Biodiversity, [online] Available at: [Air pollution, ecosystems and biodiversity | UNECE](#)

¹⁶² Defra. UK Air Information Resource. UK Ambient Air Quality Interactive Map. Available at: <https://uk-air.defra.gov.uk/data/gis-mapping/>

¹⁶³ Defra. UK Air Information Resource. UK Air Quality Limits. Available at: <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits>

¹⁶⁴ Defra. UK Air Information Resource. AQMA Details. Available at: https://uk-air.defra.gov.uk/aqma/details?aqma_ref=141

¹⁶⁵ Imperial College London. London Health Burden of Current Air Pollution and Future Health Benefits of Mayoral Air Quality Policies. Available at: http://erg.ic.ac.uk/research/home/resources/ERG_ImperialCollegeLondon_HIA_AQ_LDN_11012021.pdf

¹⁶⁶ Tower Hamlets Council. London Borough of Tower Hamlets: Air Quality Action Plan 2022 – 2027. Available at: https://www.towerhamlets.gov.uk/ignl/environment_and_waste/environmental_health/pollution/air_quality/Breathe_Clean/Air-Quality-Action-Plan.aspx

The Borough Air Quality Compendium report (2022)¹⁶⁷ summarises the Annual Status Reports (ASRs) submitted by the London boroughs in 2021 from monitoring data in 2020. LBTH showed a drop from twenty-one locations exceeding NO₂ concentrations in 2019 to just one location post distance correction in 2020. The borough is also demonstrating improvement with regards to emissions from developments and buildings, adopting Air Quality Neutral policies, checking compliance at planning application stage for every major development proposal, and 100% of schemes in 2020 having suitable energy efficiency measures installed to reduce the demand for onsite heat generation.

Future Trends and evolution of the baseline without the NLP

The UK Clean Air Strategy outlines plans to reduce emission of pollutants and improve air quality by the year 2030¹⁶⁸. This will include reductions in public exposure to particulate matter, ammonia, nitrogen oxides, sulphur dioxide, and non-methane volatile organic compounds. However, the 29% increase in road traffic from 1990 and 2018 and 6% increase in GHG emission from 1990 to 2017 is likely to continue.

Additionally, as LBTH is part of the London urban area, it is likely that increases in population and urbanisation will contribute to increased air pollution. More severe and frequent heat episodes (associated with the changing climate) can also worsen air quality and therefore asthma, respiratory diseases and allergic reactions, without further intervention.

A ban on new petrol and diesel vehicle sales in the UK by 2030 is expected to further reduce NO_x emissions. This will improve air quality, particularly across urban areas, and further the improvements to emissions reductions. Electric and hybrid vehicles are expected to become dominant (with the ban on hybrid vehicle sales in the UK by 2035).

The UK wide ban on the new petrol and diesel vehicle sales by 2030 is expected to lead to a reduction in emissions from vehicles¹⁶⁹. This will improve air quality in urban areas, which will have a positive impact on health problems associated with air pollution. Because the AQMA in the borough is associated with vehicle emissions, the transition to electric vehicles has the potential to bring air pollution to acceptable levels.

¹⁶⁷ Greater London Authority (2022) Local Authorities and Air Quality: A summary of action taken by London boroughs to improve air quality in 2020. Available at:

https://www.london.gov.uk/sites/default/files/gla_compendium_report_final_jan_2022.pdf

¹⁶⁸ Defra. (2019). Clean Air Strategy. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

¹⁶⁹ HM Government (2020). Available online at: <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

Overall, increases in population and urbanisation have the possibility to degrade air quality, while higher standards for air pollutants and vehicle emissions have the potential to improve air quality. These opposing trends may balance each other out in future.

Without the NLP development could be located in areas that are not well served by community facilities, services and jobs thereby increasing traffic movements and further impacting upon the borough’s air quality.

Issues and Opportunities

Issues and opportunities for air quality and the implications for the NLP have been identified in **Table D-14**.

Table D-14 – Issues and Opportunities for Air Quality

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation; ■ More severe and frequent heat episodes as a result of climate change can contribute to the worsening of air quality; ■ Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases; ■ The UK Government’s plan to end the sale of all new conventional petrol and diesel cars and vans by 2030 and support for work and home-based electric charging facilities, will promote use of hybrid and electric vehicles, with positive effects for air quality; and ■ Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality. 	<ul style="list-style-type: none"> ■ The NLP must consider the implications of Government plans, facilitating the transition to electric vehicles. ■ Consideration should be given to methods of modal shift to sustainable transport modes (public transport and active transport) active, to aid in reducing emissions. ■ The NLP should aim to improve congested areas of LBTH, minimising excess emissions where possible and aiding in improving air quality. ■ The NLP could consider living wall systems in the borough for associated air quality, biodiversity, and visual amenity benefits in highly urbanised areas.

Climate Change and Greenhouse Gases

Summary of Current Baseline

In 2021, an estimated 26% of greenhouse gas emissions (GHGs) in the UK were from the transport sector, 20% energy supply, 18% business and 16% residential, with carbon dioxide (CO₂) being the most prominent gas from these sectors¹⁷⁰. In 2021, transport accounted for 109.5 MtCO₂e of GHG emissions, which represents a 10% increase from 2020, but an 11% decrease compared with 2019 figures. The impact of the pandemic in 2020 caused transport emissions to fall, attributable to lockdown measures introduced.

In 2020, a total of 1,020.4 ktCO₂e emissions¹⁷¹ were generated by LBTH, with the greatest number of emissions arising from commercial uses (33.9%), followed by transport (25.9%), and domestic uses (20.9%). The percentage change of emissions per km² from 2005 to 2019 is -43% for the borough, better than the national average reduction of -36% for the same period. **Table D-15** shows the breakdown of emissions generated by the highest emission sectors in LBTH compared to regional and national averages.

¹⁷⁰ Defra (2023) 2021 UK Greenhouse Gas Emissions, Final Figures. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1134664/greenhouse-gas-emissions-statistical-release-2021.pdf

¹⁷¹ Department for Business, Energy & Industrial Strategy (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020>

Table D-15 – Carbon Emissions¹⁷¹

	Total Emissions (ktCO₂e)	Commercial Emissions (%)	Transport Emissions (%)	Domestic Emissions (%)
Tower Hamlets	1,081.2	33.9	25.9	20.9
London	28,369.3	36.2	28.5	36.2
England	291,134.6	7.0	30.7	26.3

In 2019, the average per capita emissions across LBTH are 3.6 tonnes of CO₂ emissions per person, which is slightly higher than the regional of 3.2 tonnes per person but significantly lower than the national average of 8.9 tonnes per person¹⁷¹.

During the most recent decade (2009-2018) the UK has been on average 0.3°C warmer than the 1981-2010 average and 0.9°C warmer than 1961-1990. All of the top ten warmest years have occurred since 2002. In the past few decades there has been an increase in annual average rainfall over the UK, for which the most recent decade (2009-2018) has been on average 5% wetter than 1961-1990 and 1% wetter than 1981-2010¹⁷².

LBTH has a relatively high climate risk according to The London Climate Risk Maps¹⁷³, which measures overall risk using 13 metrics, which are as follows:

- Ages Under 5;
- Ages Over 75;
- English Proficiency;
- Income Deprivation;
- Social Renters;
- BAME;
- Average Land Surface Temperature;

¹⁷² Met Office (2022) UK Climate Projections: Headline Findings. Available at: https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18_headline_findings_v4_aug_22.pdf

¹⁷³ Bloomberg Associates (2022) Climate Risk Mapping. Available at: <https://data.london.gov.uk/dataset/climate-risk-mapping>

- Surface Water Flood Risk;
- PM_{2.5};
- NO₂;
- Green/Blue Land Cover; and
- Areas of Deficiency in Access to Public Open Space.

Areas including Wapping, Shadwell, Bethnal Green, Bow and Poplar have the highest climate risk, traversing west to east of the borough. Limehouse, Blackwall and Isle of Dogs have the lowest climate risk, and subsequently a lower heat risk. Urban heat island (UHI) is the phenomenon where temperatures are relatively higher in cities compared to surrounding rural areas. UHI up to 8°C have been felt in UK cities, whilst cities the size of London has experienced temperatures in the order of 10°C, and concern for excess urban heat are increasing¹⁷⁴.

Future Trends and evolution of the baseline without the NLP

The UK is committed to legally binding GHG emissions reduction targets of 80% by 2050, compared to 1990 levels, as set out in the Climate Change Act 2008¹⁷⁵. The UK ratified the 2015 Paris Agreement, which set out a GHG emission reduction target of at least 40% by 2030, compared to 1990 with a long-term strategy for net zero emissions by 2050¹⁷⁶. However, a more ambitious target was set by the UK in 2020 to reduce greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels¹⁷⁷. Currently there is widespread criticism as to whether the UK is on track to meet these ambitions.

Working towards these targets means changes to technology as well as ways in which people travel. For example, prior to the 26th Conference of the Parties (COP26) Summit in 2021, the UK brought forward its ban on the selling of new petrol, diesel, or hybrid cars from 2040 to 2030. The last decade has seen a remarkable surge in demand for electric vehicles in the UK.

The number of licensed ultra-low emission vehicles (ULEVs) in the UK has increased by 3,427% between the end of March 2010 to the end of June 2020, a jump from just under 9,000 ULEVs to 317,000 ULEVs¹⁷⁸.

¹⁷⁴ Royal Meteorological Society (2017) Urban Heat Islands. Available at: [Urban Heat Islands | Royal Meteorological Society \(rmets.org\)](#)

¹⁷⁵ Climate Change Act 2008, Available online at: <https://www.legislation.gov.uk/ukpga/2008/27/contents>

¹⁷⁶ Paris Agreement, Available online at: https://ec.europa.eu/clima/policies/international/negotiations/paris_e

¹⁷⁷ Department for Business, Energy and Industrial Strategy, Press Release: UK Sets Ambitious New Climate Target Ahead of UN Summit, 2020, Available online at: <https://www.gov.uk/government/news/uk-sets-ambitious-newclimate-target-ahead-of-un-summit>

¹⁷⁸ House of Commons (2020) Briefing Paper: Electric Vehicles and Infrastructure. Available at: <https://researchbriefings.files.parliament.uk/documents/CBP-7480/CBP-7480.pdf>

Since the 27th Conference of the Parties (COP27) Summit in 2022, the UK has pledged to triple its contributions to adaptation finance by 2025¹⁷⁹, in recognition of the existential threat climate change is posing globally. The next UN climate summit, COP28, held in November/December 2023, is set to take stock of its progress on the Paris Agreement through the first Global Stocktake (GST)¹⁸⁰.

The Mayor of LBTH declared a climate emergency in 2019 and set an ambitious target for the council to become net zero by 2025, and the borough net zero by 2045. The London Borough of Tower Hamlets Net Zero Carbon Plan document sets out the strategic vision on how this is going to be achieved¹³¹. The plan details actions recommended for Power, Buildings, Transport, Waste, Forestry and land use, Industry, Aviation, and F-gases.

By the end of the 21st century, all areas of the UK are projected to be warmer, more so in summer than in winter. This projected temperature rise in the UK is consistent with future warming globally. Rainfall patterns across the UK are not uniform and vary on seasonal and regional scales and will continue to vary in the future, with significant increases in hourly precipitation extremes⁴. Both temperature and rainfall changes will be much larger if greenhouse gas emissions continue to increase.

Despite this, the current estimate for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future, given the timescales associated with climate change. This being the case, there will be an increasing need to implement climate change mitigation and adaptation measures in light of changing environmental conditions.

A new NLP would allow for better designed developments and buildings which are more resilient to the effects of climate change, reduce GHGs construction and operation (including embodied carbon). It will likely support developments that would also likely be more accessible, particularly by sustainable transport, which in turn will aid the borough in reducing the amount of greenhouse gases it produces.

¹⁷⁹ House of Commons (2023) What was agreed at COP27? Available at: <https://commonslibrary.parliament.uk/what-was-agreed-at-cop27/>

¹⁸⁰ COP28 UAE | United Nations Climate Change Conference (UNFCCC)

Issues and Opportunities

Issues and opportunities for climate change and greenhouse gases and the implications for the NLP have been identified in **Table D-16**.

Table D-16 – Issues and Opportunities for Climate Change and Greenhouse Gases

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Transport is the largest contributor to GHG emissions in the UK. In LBTH, the largest contributor is from commercial uses; ■ Higher than average fuel poverty rates may continue to be a significant issue in the borough; ■ Since the Covid-19 pandemic, private car use has increased which contributes to GHG emissions; ■ The impacts of the Urban Heat Island (UHI) generated in London will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households; ■ There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH; and ■ There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit. 	<ul style="list-style-type: none"> ■ There is a need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding. The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames. ■ There is a need to support the continued increase in charging infrastructure to support the demand in electric cars, as well as the modal shift to more sustainable transport. ■ The NLP should promote the implementation of Nature-based solutions (NbS) to build resilience to facilitate climate change adaptation, whilst providing a feasible method to sequester and store carbon in line with net zero ambitions. ■ There is need for low carbon buildings and energy to support LBTH’s commitment to reach net-zero, to reduce ‘embodied’ and ‘operational’ carbon. ■ The NLP should address the demand for on-site renewable energy to reduce national grid dependency. ■ The NLP should promote actions to ensure appropriate habitat is created that will be of importance to habitat connectivity and creating resilient

Key Risks/Opportunities	Implications for the NLP
	<p>functioning ecosystems, to allow wildlife to adapt to climate change.</p> <ul style="list-style-type: none"> ■ The NLP should set a target for the percentage of wild cover within green spaces to help prevent further biodiversity decline.

Material Assets (including Soil Resources)

Summary of Current Baseline

Geology and Soils

Government policy promotes development on previously developed land (brownfield land) rather than on greenfield land, to make the most efficient use of a finite resource. The borough’s land is predominantly in urban use¹⁸¹.

Southern and eastern England is underlain by a Principal Aquifer, ‘the Chalk’, which usually provides a high level of water storage as a result of its well-developed network of fractures. It may support water supply and/or river base flow on a strategic scale, however these are prone to diffuse pollution¹⁸². Parts of the borough are underlain by Secondary Aquifers.

The bedrock geology within the borough is predominantly sedimentary bedrock of clay, silt and sand, overlain with superficial deposits sedimentary in origin, deposited in the Quaternary period¹⁸³. The Taplow and Kempton Park Gravels in the borough are classified as Secondary A aquifers and are therefore protected superficial deposits. Gilbert’s Pit (Charlton) SSSI in Greenwich is in closest proximity to LBTH, designated for its geological importance.

London is the world’s biggest centre for investment in the minerals industry, with most of the world’s biggest mining companies listed on the London Stock Exchange¹⁸⁴. London itself

¹⁸¹ Natural England (2010) Agricultural Land Classification map London and the South East (ALC007) Available at: <https://publications.naturalengland.org.uk/publication/141047>

¹⁸² British Geological Survey, The Chalk. Available at: <https://www2.bgs.ac.uk/groundwater/shaleGas/aquifersAndShales/maps/aquifers/Chalk.html>

¹⁸³ British Geological Survey, Geology Viewer. Available at: https://geologyviewer.bgs.ac.uk/?_ga=2.40981476.739853416.1672832649-1352688571.1672832649

¹⁸⁴ London Stock Exchange. Available at: <https://www.londonstockexchange.com/>

has extensive history of mining and quarrying, specifically, chalk mines with associated flint deposits. Recorded extraction sites in LBTH include¹⁸⁵:

- Bow Rail Depot
- St Thomas Mill Brick Field
- Orchard Wharf

Soil sealing refers to the covering of the ground by an impermeable material and is one of the main causes of soil degradation. Over a third of the borough's surface area is covered by sealed surfaces, such as buildings, roads and car parks⁴⁰. This can have an impact on surface water flooding which is already a prevalent issue in the borough.

Local authorities have a duty to identify contaminated land under Section 78B of the Environmental Protection Act 1990¹⁸⁶. The borough has a legacy of land contamination as a result of widespread past industrial activity, particularly around the former docks¹⁸⁷. This is important to consider for the development of brownfield sites, as proper remediation will be required to enable development to take place, and remediation should seek to protect and improve both groundwater and land quality.

Energy

The commitment of the LBTH to become net zero by 2025, and LBTH net zero by 2045 will require commitments to increasing the supply of renewable energy within the borough. The Mayor of London has set a target to supply 15% of London's overall energy from renewable, local sources by 2030¹⁸⁸. This is in line with the growth of renewables demand and increased production in the UK¹⁸⁹.

The borough produces approximately 5.9MW installed capacity from just photovoltaics, performing in the lower half of London boroughs¹⁹⁰. Throughout the borough, the following renewable energies are currently utilised (2021), with their approximate energy productions:

- Solar photovoltaic (PV) – 692 systems installed, generating 4,449MWh of renewable electricity

¹⁸⁵ British Geological Survey, GeoIndex. Available at: <https://www.bgs.ac.uk/map-viewers/geoindex-onshore/>

¹⁸⁶ Legislation.gov.uk (1990) Environmental Protection Act 1990. Part IIA Contaminated Land. Available at: <https://www.legislation.gov.uk/ukpga/1990/43/part/IIA>

¹⁸⁷ Tower Hamlets Council (2022) Strategy for the Identification of Contaminated Land. Available at: [Strategy-for-the-identification-of-contaminated-land.docx \(live.com\)](#)

¹⁸⁸ London Assembly (2022) London's renewable energy future. Available at: <https://www.london.gov.uk/press-releases/assembly/londons-renewable-energy-future>

¹⁸⁹ Gov.uk (2019) Extractive industries in the UK. Available at: <https://www.gov.uk/government/publications/extractive-industries-transparency-initiative-payments-report-2018/extractive-industries-in-the-uk>

¹⁹⁰ Defra (2022) Regional Renewable Statistics. Available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>

- Onshore wind – 1 installation, no data on approximate energy production

LBTH is supporting the council commitment to become net zero by further investing into renewable energy generation by installing photovoltaics onto council offices and leisure centres, also aiding households through a separate fund¹⁹¹.

Waste

The UK generated 222 million tonnes of waste in 2018¹⁹². In LBTH, a total of 113,059 tonnes of waste was collected from the kerbside in 2017/18¹⁹³. Household waste recycling rates in the borough have decreased between 2017/18 (26%) and 2020/21 (19%) by -7%, compared to the rates for London and England which have mainly remained unchanged across this period¹⁹⁴. The rates in the borough are also significantly lower than the 2020/21 average rates for both London (33%) and England (42%). In 2019/20, LBTH was the fourth-worst local authority for recycling in the whole of the UK. Since 2011/2012, all residual waste produced in the borough has been diverted from going directly to landfill to energy recovery¹⁹⁵. The energy from waste (EfW) facility is located in Belvedere in the London Borough of Bexley and has an annual capacity of 585,000t with a 66MW output¹⁹⁶. This process is estimated to save 170,000t of carbon by not sending waste to landfill¹⁹⁷.

Future Trends and evolution of the baseline without the NLP

In order for the borough to reach net zero by their respective target dates of 2025 and 2045, the increase of renewable energy supply will be pivotal. Shifting dependency away from non-renewable sources is crucial to meet such ambitions. The projected population increase in the borough will increase energy needs and renewables will be required to meet this demand.

The limitations of space for constructing renewable energy will be challenging as all new buildings must have ultra-low levels of total energy use, however, the NLP present opportunities to incorporate renewable energy as part of the design of new developments.

¹⁹¹ Tower Hamlets Council, A Cleaner and Greener Future for Tower Hamlets. Available at:

<https://www.towerhamlets.gov.uk/Documents/Climate/Cleaner-Greener-Leaflet.pdf>

¹⁹² Defra (2022) UK statistics on waste. Available at: <https://www.gov.uk/government/statistics/uk-waste-data/uk-statistics-on-waste#total-waste-generation-and-final-treatment-of-all-waste>

¹⁹³ Tower Hamlets Council, Waste management strategy 2018-30. Available at:

https://democracy.towerhamlets.gov.uk/documents/s143602/6.4a%20Appendix%201%20-%20WasteStrategy_final.pdf

¹⁹⁴ Defra, Household Waste Recycling Rates, Borough. Available at: [Household Waste Recycling Rates, Borough – London Datastore](#)

¹⁹⁵ Tower Hamlets Council, Draft Waste Management Strategy 2018-2030. Available at:

<https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=128934>

¹⁹⁶ Power Technology (2011) The Riverside Resource Recovery Facility Project, UK. Available at: <https://www.power-technology.com/projects/riverside/>

¹⁹⁷ Cory Group (2021) Sustainability Report 2021. Available at:

https://www.corygroup.co.uk/application/files/7216/6066/0318/Cory_Sustainability_Report_2021.pdf

The growing population and associated need for development are also likely to increase the use of mineral resources and waste generation. As such, it will be necessary to apply resource efficiency and waste management measures, including the re-use and recycling of materials.

The absence of the NLP could make it difficult for LBTH to properly plan for the amount of waste it will be expected to manage in the future. It may also compromise the boroughs' ability to plan for the amount of building material it needs to import in order to achieve its growth goals.

Issues and Opportunities

Issues and opportunities for material assets and the implications for the NLP have been identified in **Table D-17**.

Table D-17 – Issues and Opportunities for Material Assets

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ The growing population and associated need for development is likely to increase the use of mineral resources and waste generation. This is highly important considering the Belvedere EfW facility processes waste from across London; ■ Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population; and ■ There is a continued increase in renewable energy supplies across the borough, of which needs to be managed efficiently to ensure the capacity requirements of this transition are met. 	<ul style="list-style-type: none"> ■ The NLP should promote actions to protect natural resources, buildings and infrastructure from the impacts of climate change. ■ The NLP should protect and conserve the borough's best and most versatile land from development where possible and utilise areas with capacity for growth. ■ The NLP should explore innovative ways to manage waste and align principles to support a circular economy when possible. ■ The NLP should maximise onsite renewable energy efficiency by making use of vertical solar panels and maximise space by seeking wind solutions through roof-mounted turbines.

Appendix E

Review of Plans, Policies and Programmes



Table E-1 – Relevant Plans, Policies, strategies and Programmes - Population and Equalities

Document	Key Messages/ Issues
The Equality Act, 2010	<p>The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It is against the law to discriminate against anyone because of:</p> <ul style="list-style-type: none"> ▪ Age; ▪ Being or becoming a transsexual person; ▪ Being married or in a civil partnership; ▪ Being pregnant or having a child; ▪ Disability; ▪ Race including colour, nationality, ethnic or national origin; ▪ Religion, belief or lack of religion/belief; ▪ Sex; and ▪ Sexual orientation.
National Planning Policy Framework (NPPF), 2023	<p>When delivering new schemes, applicants must avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the UK Government’s planning guidance. Applicants should provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes.</p>
Department for Transport, Transport for Everyone: an action plan to promote equality, 2012	<p>The Action Plan sets what the UK Government is doing to ensure people from all communities in society have the option to use public transport.</p> <p>The main aim of the report is to <i>‘deliver better access to jobs and key services through an accessible and socially inclusive transport system, by removing the barriers to travel and</i></p>

Document	Key Messages/ Issues
	<i>ensuring that social impacts are addressed in policy development and service delivery’.</i>
Strong and Prosperous Communities: The Local Government White Paper, 2006	Deliver better public services through involving and consulting users more fully, providing better information about local standards and managing services at neighbourhood level.
Foresight Mental Capital and Wellbeing Project (2008). Final Project report. The Government Office for Science	As the number of older adults increases substantially in the UK over the next six decades, the existing urban and rural infrastructure will need to be adapted so that the needs of these people are met. For example, issues of access, transport, amenity and security will substantially affect the wellbeing of older people.
Addressing Transport Barriers to work in Low Income Neighbourhoods, Sheffield Hallam University, 2017	<p>Transport is a key factor shaping experiences of poverty. The ability of households in poverty to find paid work often depends on access to affordable, regular and reliable transport.</p> <p>Residents of low-income neighbourhoods generally have a significant reliance on bus services. This can create issues regarding variable frequency, timing, reliability and range of places served.</p> <p>There is considerable evidence that transport issues affect different groups to varying extents and in particular ways, especially in terms of gender.</p> <p>A distinguishing feature of low-income neighbourhoods is the relatively low incidence of motor vehicle ownership. This means that residents have a much higher reliance on public transport than those living in middle and high-income areas.</p>

Document	Key Messages/ Issues
	Difficulties in meeting the costs of transport from current incomes have given rise to the concept of 'transport poverty'.
Build Back Fairer: The Covid-19 Marmot Review, 2020	<p>The Marmot Review identified that the levels of social, environmental and economic inequality in society are damaging health and well-being. This report identifies that as the UK emerges from the pandemic it would be a mistake to attempt to re-establish the status quo that existed before the pandemic.</p> <p>The reductions in car traffic during the pandemic resulted in cleaner air and reduction in emission of greenhouse gases. Walking and cycling as modes of transport became both necessary and desirable. As the pandemic is brought under control and public transport again becomes safe, a future for our cities based on reduction in vehicle traffic and made safe for walking and cycling in addition to public transport is a future we can both imagine and realise.</p> <p>Building Back Fairer requires a sizeable reduction in private car use and greater active travel and use of public transport. Efforts to support this are required urgently and would help to reduce Greenhouse Gas Emissions and lead to a more sustainable environment.</p>
<i>Regional</i>	
Mayor of London, Social Infrastructure: Supplementary Planning Guidance (SPG), 2015	Population growth in London means that it is important to ensure that new development, particularly in Opportunity and Intensification Areas, Areas for Regeneration, and large residential development is supported by necessary social

Document	Key Messages/ Issues
	<p>infrastructure. This is important not only for the quality of life for residents in new developments, but also the quality of life for the existing population, who should not see a reduction in the quality of their services, their health and wellbeing or their experience of living in London.</p> <p>This SPG provides guidance for:</p> <ul style="list-style-type: none"> ■ Borough planners and public health practitioners in gathering information about places as part of the evidence base for policies in their local plans and in assessing planning applications. ■ Developers and their consultants in preparing planning applications in order to ensure that schemes respond to social infrastructure requirements, enabling them to recognise the role of social infrastructure provision in place making and its potential as a driver of value in development projects. ■ Community groups and Neighbourhood Forums in understanding the requirements for social infrastructure in their areas to inform the preparation of Neighbourhood Plans. ■ Local authority Directors of Public Health to shape and inform their role around planning and social infrastructure-linked to their responsibility for all of their local authority’s duties to take steps to improve the health of the people in its area.
<p>Mayor of London, The London Plan 2021. Chapter 5: Social Infrastructure</p>	<p>The London Plan (2021) is London’s Spatial Development Strategy (SDS). It sets out an integrated economic,</p>

Document	Key Messages/ Issues
	<p>environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 5: Social Infrastructure includes:</p> <ul style="list-style-type: none"> ▪ Policy S1 Developing London’s social infrastructure ▪ Policy S2 Health and social care facilities ▪ Policy S3 Education and childcare facilities ▪ Policy S4 Play and informal recreation ▪ Policy S5 Sports and recreation facilities ▪ Policy S6 Public toilets ▪ Policy S7 Burial space
<i>Local</i>	
Tower Hamlets Council, Tower Hamlets Equality policy	<p>The equality policy sets out a clear commitment to ensure equality is at the heart of everything the council does; from money spent and the people employed, to the services provided. The council is committed to creating cohesive communities that are strong, fair and inclusive.</p>

Table E-2 – Relevant Plans, Policies, strategies and Programmes - Human Health

Document	Key Messages/ Issues
<i>National</i>	
<p>Fair Society, Healthy Lives: The Marmot Review: Strategic review of health inequalities in England post, 2012</p>	<p>Reducing health inequalities is a matter of fairness and social justice. In England, the many people who are currently dying prematurely each year as a result of health inequalities would otherwise have enjoyed, in total, between 1.3 and 2.5 million extra years of life.</p> <p>Ensure a healthy standard of living for all; Create and develop healthy and sustainable places and communities; and strengthen the role and impact of ill health prevention.</p>
<p>Build Back Fairer: The Covid-19 Marmot Review, 2020</p>	<p>The Marmot Review identified that the levels of social, environmental and economic inequality in society are damaging health and well-being. This report identifies that as the UK emerges from the pandemic it would be a mistake to attempt to re-establish the status quo that existed before the pandemic.</p> <p>The reductions in car traffic during the pandemic resulted in cleaner air and reduction in emission of greenhouse gases. Walking and cycling as modes of transport became both necessary and desirable. As the pandemic is brought under control and public transport again becomes safe, a future for our cities based on reduction in vehicle traffic and made safe for walking and cycling in addition to public transport is a future we can both imagine and realise.</p> <p>Building Back Fairer requires a sizeable reduction in private car use and greater active travel and use of public transport. Efforts</p>

Document	Key Messages/ Issues
	to support this are required urgently and would help to reduce Greenhouse Gas Emissions and lead to a more sustainable environment.
NPPF, 2021	<p>Paragraph 92 of the NPPF states:</p> <p><i>'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</i></p> <p><i>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</i></p> <p><i>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and</i></p> <p><i>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'</i></p>
Chartered Institution of Highways and Transportation (CIHT), Better planning, better transport, better places, 2019	Poorly located and designed new development seriously hinders healthy lifestyles. Physical inactivity directly contributes to one in six deaths in the UK, drives rising levels of obesity, and is the

Document	Key Messages/ Issues
	<p>fourth largest cause of disease and disability. It costs society an estimated £7.4 billion a year and places the national healthcare system under increasing financial strain.</p> <p>By enabling compact, higher density, and mixed-use patterns of development. This encourages more people to incorporate physical activity into their daily journeys, improving productivity and dramatically reducing ill health.</p>
<p>Transport, health, and wellbeing: An evidence review for the Department for Transport, 2019</p>	<p>There are three main mechanisms that link transport and health and wellbeing:</p> <ul style="list-style-type: none"> ■ Transport and access: Transport plays a key role in improving access to health services, particularly for vulnerable groups like older people. ■ Mode of transport: Mode of transport affects physical and mental health, via mechanisms including physical activity and commuting time. ■ Wider effects of transport and infrastructure: Transport can facilitate social interactions and promote social inclusion.
<p>Public Health England, Health Matters, Physical Activity: Prevention and management of long-term conditions</p>	<p>Regular physical activity provides a range of physical and mental health and social benefits, including:</p> <ul style="list-style-type: none"> ■ Reducing the risk of many long-term conditions ■ Helping manage existing conditions ■ Ensuring good musculoskeletal health ■ Developing and maintaining physical and mental function and independence ■ Supporting social inclusion ■ Helping maintain a healthy weight ■ Reducing inequalities for people with long-term conditions

Document	Key Messages/ Issues
	<p>The UK Chief Medical Officers (CMOs’) Physical Activity Guidelines state that for good physical and mental health, adults should aim to be physically active every day. Any activity is better than none, and more is better still.</p> <p>Regular physical activity can help to prevent and manage a range of chronic conditions and diseases, many of which are on the rise and affecting people at an earlier age.</p>
<i>Regional</i>	
<p>Mayor of London, The London Health Inequalities Strategy, 2018</p>	<p>The vision and aims set out in this strategy are derived from an analysis of health inequalities in London, including the variation in healthy life expectancy. It has been further informed by an IIA, and the large response to the public consultation on the draft strategy in 2017. Five key aims have been identified to tackle inequalities and achieve the mayor’s vision in London over the next ten years:</p> <ul style="list-style-type: none"> ▪ Healthy Children: Every London Child has a Healthy Start in Life ▪ Healthy Minds: All Londoners Share in a City with the Best Mental Health in the World ▪ Healthy Places: All Londoners Benefit from an Environment and Economy that Promotes Good Mental and Physical Health ▪ Healthy Communities: London’s Diverse Communities are Healthy and Thriving ▪ Healthy Living: The Healthy Choice is the Easiest Choice for All Londoners

Document	Key Messages/ Issues
<i>Local</i>	
<p>Tower Hamlets Health and Wellbeing Board: Tower Hamlets Health and Wellbeing Strategy 2021-2025</p>	<p>The Tower Hamlets Health and Wellbeing board is a statutory committee of the council. The board aims to improve the health and wellbeing of local people and tackle health inequalities. The Health and Wellbeing Strategy 2021-2025 is prepared based upon the needs identified within Tower Hamlets health and wellbeing profile.</p> <p>Ambitions for a ‘healthy borough’:</p> <ul style="list-style-type: none"> ▪ Everyone can access safe, social spaces near their home to live healthy lives a community ▪ Children and families are healthy happy and confident ▪ Young adults have the opportunities, connections, and local support to live healthy lives ▪ Middle aged and older people are supported to lived healthy lives and get support early if they need to it ▪ Anyone needing help knows where to get it and is supported to find the right help
<p>Tower Hamlets Spatial Planning and Health Needs Assessment, 2023</p>	<p>This Needs Assessment has been produced to provide detailed guidance on the application of Tower Hamlets existing Local Plan’s policies (2020) in respect of health-related matters. This document highlights the ways in which the planning system can contribute to protecting and improving people’s physical and mental health and promote the creation of healthy places. It explains how the relevant Local Plan policies can be applied to achieve better health outcomes and outlines or signposts other</p>

Document	Key Messages/ Issues
	strategies and initiatives that support and complement the Local Plan policies.

Table E-3 – Relevant Plans, Policies, strategies and Programmes – Economy and Employment

Document	Key Messages/ Issues
<i>National</i>	
Growth and Infrastructure Act (2013)	<p>The Act allows the modification or discharge of the affordable housing elements of section 106 agreements in order to make developments more viable.</p> <p>Contains measures to extend permitted development rights to allow single-storey extensions of up to eight metres.</p> <p>Reduces the volume of extra paperwork required with a planning application; removing over-lapping development consent regimes that require multiple extra permissions from different government agencies.</p>
NPPF, 2023	<p>To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including, but not limited to:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Those who require affordable housing; ■ Families with children; ■ Older people; ■ Students; ■ People with disabilities; ■ Service families; ■ Travellers; ■ People who rent their homes; and ■ People wishing to commission or build their own homes. <p>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.</p>
The Enterprise Act (2016)	<p>The Enterprise Act includes measures to:</p> <ul style="list-style-type: none"> ■ Establish a Small Business Commissioner to help small firms resolve issues. ■ Extend the Primary Authority scheme to make it easier for businesses to access tailored and assured advice from local authorities, giving them greater confidence to invest and grow. ■ Protect and strengthen apprenticeships by introducing targets for apprenticeships in public sector bodies in England, and

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ▪ Establish an Institute for Apprenticeships – an independent, employer-led body that will make sure apprenticeships meet the needs of business.
<p>UK Industrial Growth Strategy, 2017</p>	<p>The Industrial Strategy sets out a long-term plan to boost the productivity and earning power of people throughout the UK. It sets out how the UK Government is working towards building a Britain fit for the future – how they will help businesses create better higher-paying jobs in every part of the UK with investment in the skills, industries and infrastructure of the future.</p> <p>The strategy includes five foundations:</p> <ul style="list-style-type: none"> ▪ Ideas: the world’s most innovative economy ▪ People: good jobs and greater earning power for all ▪ Infrastructure: a major upgrade to the UK’s infrastructure ▪ Business environment: the best place to start and grow a business ▪ Places: prosperous communities across the UK <p>The UK Government will use this strategy to work with industry, academia and civil society over the coming years to build on the UK’s strengths, make more of untapped potential and create a more productive economy that works for everyone across the UK.</p>
<p>The Clean Growth Strategy, 2017</p>	<p>This Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of “clean growth”, i.e. deliver increased economic growth and decreased emissions. The Strategy has two guiding objectives:</p>

Document	Key Messages/ Issues
	<p>1. To meet our domestic commitments at the lowest possible net cost to UK taxpayers, consumers and businesses; and, 2. To maximise the social and economic benefits for the UK from this transition.</p> <p>In order to meet these objectives, the UK will need to nurture low carbon technologies, processes and systems that are as cheap as possible.</p>
<i>Regional</i>	
<p>Mayor of London, The London Plan 2021. Chapter 6: Economy</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community. Chapter 6: Economy includes:</p> <ul style="list-style-type: none"> ■ Policy E1 Offices ■ Policy E2 Providing suitable business space ■ Policy E3 Affordable workspace ■ Policy E4 Land for industry, logistics and services to support London’s economic function ■ Policy E5 Strategic Industrial Locations (SIL) ■ Policy E6 Locally Significant Industrial Sites ■ Policy E7 Industrial intensification, co-location and substitution

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy E8 Sector growth opportunities and clusters ■ Policy E9 Retail, markets and hot food takeaways ■ Policy E10 Visitor infrastructure ■ Policy E11 Skills and opportunities for all
<i>Local</i>	
<p>Tower Hamlets Council, Council Strategic Plan 2022-2026</p>	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. Tower Hamlets has a wealth of arts and sporting opportunities. Our local businesses and markets are the lifeblood of the community and should prosper alongside the international business hubs at Canary Wharf, Whitechapel and the City Fringe. At a time of economic uncertainty and rising costs, every resident should be able to access the opportunities on their doorstep.</p> <p>‘Priority 4: Boost culture, business, jobs and leisure’. Ambition is for residents from all backgrounds benefit from thriving sports, the arts, and local business.</p>
<p>Tower Hamlets Council, Tower Hamlets Growth and Economic Development Plan 2018-2023</p>	<p>The Tower Hamlets Growth and Economic Development Plan 2018-2023 aims to build an economy that works for local people and ensure everyone can benefit from the borough’s success. The council’s vision is to create a Tower Hamlets that delivers sustainable and inclusive economic growth enabling all of our residents and businesses to prosper.</p> <p>Priorities:</p> <ul style="list-style-type: none"> ■ Priority 1: Preparing our young people for success ■ Priority 2: Helping our working age residents to thrive

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> Priority 3: Creating the conditions for business growth

Table E-4 – Relevant Plans, Policies, strategies and Programmes – Housing

Document	Key Messages/ Issues
<i>National</i>	
NPPF,2023	<p>To support the Governments objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.</p> <p>Paragraph 65 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.</p> <p>Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</p>
Planning for the Future White Paper (2020)	<p>Proposes to reform the planning process bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed. The vision is to 'build better, greener and faster'.</p>

Document	Key Messages/ Issues
Housing Act 2004	<p>The Act covers housing conditions, and licensing of houses in multiple occupation and residential accommodation.</p> <p>It requires local housing authorities to assess the accommodation needs of Gypsies and Travellers in their area and produce a strategy on how these needs can be met.</p>
National Planning Practice Guidance (NPPG) – Housing and economic land availability assessment	<p>This Guidance sets out the method for assessing housing and economic land availability. This is used to identify future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.</p>
NPPG – housing and economic needs assessment	<p>This Guidance helps councils to assess their housing needs.</p> <p>The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.</p>
NPPG Housing needs of different groups	<p>This Guidance provides advice on planning for the housing needs of different groups.</p> <p>Authorities must also consider the implications of their duties under the Equality Act 2010, including the Public Sector Equality Duty.</p> <p>When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.</p>
NPPG – Housing for older and disabled people	<p>This Guidance provides advice in preparing planning policies on housing for older and disabled people.</p>

Document	Key Messages/ Issues
	<p>People are living longer lives and the proportion of older people in the population is increasing. The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.</p> <p>Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.</p> <p>Where an identified need exists, plans are expected to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing.</p>
NPPG – Housing supply and delivery	<p>This Guidance provides advice on the 5-year housing land supply and Housing Delivery Test.</p> <p>Authorities should use the standard method as the starting point when preparing the housing requirement in their plan. The purpose of the 5-year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years.</p>
Growth and Infrastructure Act 2013	<p>The Act allows the modification or discharge of the affordable housing elements of section 106 agreements in order to make developments more viable.</p>

Document	Key Messages/ Issues
	<p>Reduces the volume of extra paperwork required with a planning application, and removing over-lapping development consent regimes, to help to improve efficiency of the planning regulations.</p>
<i>Regional</i>	
<p>Mayor of London, The London Plan 2021. Chapter 4: Housing</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure.</p> <p>Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 4: Housing includes:</p> <ul style="list-style-type: none"> ■ Policy H1 Increasing housing supply ■ Policy H2 Small sites ■ Policy H3 Meanwhile use as housing ■ Policy H4 Delivering affordable housing ■ Policy H5 Threshold approach to applications ■ Policy H6 Affordable housing tenure ■ Policy H7 Monitoring of affordable housing ■ Policy H8 Loss of existing housing and estate redevelopment ■ Policy H9 Ensuring the best use of stock ■ Policy H10 Housing size mix ■ Policy H11 Build to Rent

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy H12 Supported and specialised accommodation ■ Policy H13 Specialist older persons housing ■ Policy H14 Gypsy and traveller accommodation ■ Policy H15 Purpose-built student accommodation ■ Policy H16 Large-scale purpose-built shared living
<p>Mayor of London, London Plan Guidance (LPG), Affordable Housing, 2023 (consultation draft)</p>	<p>The Affordable Housing LPG provides a further step to implement the London Plan, ensuring that developments assessed through the planning system maximise affordable housing delivery. It sets out how the threshold approach should work in practice and clarifies the requirements of different types of affordable housing and how they should be secured and monitored.</p> <p>Local planning authorities should apply the threshold approach to applications for sites that are capable of delivering 10 or more homes. When developing new policies on affordable housing, planning obligations and Community Infrastructure Levy (CIL) rates, local plans are required to be in general conformity with the London Plan. LPAs should apply the approach to affordable housing in the London Plan and in this LPG as a part of their plan and decision-making processes.</p>
<p>Mayor of London, London Plan Guidance (LPG), Development Vitality, 2023 (consultation draft)</p>	<p>The draft Development Viability LPG builds upon policy of the London Plan and provides a further step towards ensuring that developments assessed through the planning system maximises affordable housing delivery, setting out how viability assessment should be carried out where a planning application follows the Viability Tested Route. It is relevant to all planning applications where an applicant or planning authority needs to rely on viability</p>

Document	Key Messages/ Issues
	information and should be taken account of by planning authorities where area-wide viability testing is being carried out.
<i>Local</i>	
Tower Hamlets Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The housing crisis is the greatest challenge facing London today. In recent years, Tower Hamlets has delivered more homes than any other authority in England. However, there is an acute shortage of social homes. Too many residents live in overcrowded accommodation. The council will work alongside residents, housing providers and landlords to achieve real change.</p> <p>‘Priority 2: Homes for the future’. Ambition is that everyone in Tower Hamlets lives in a good quality home that they can afford.</p>
Tower Hamlets Council, High Density Living SPD, 2020	The High Density Living Supplementary Planning Document (SPD) provides guidance to shape high density development, so it supports good quality of life for Tower Hamlets’ residents.
Tower Hamlets Council, Central Area Good Growth SPD, 2021	The Central Area Good Growth SPD provides guidance to help the council deliver this housing growth, focusing specifically on design guidance to ensure that new developments respect and enhance the well-established character of this part of the borough. The Central Area Good Growth SPD is a material consideration to help determine planning applications for small-scale residential-led developments in the central part of the London Borough of Tower Hamlets.

Table E-5 – Relevant Plans, Policies, strategies and Programmes – Crime and Safety

Document	Key Messages/ Issues
<i>National</i>	
NPPF, 2023	<p>Paragraph 92 (b) of the policy states that policies should help to develop places that <i>‘are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas’</i>.</p> <p>Places and developments should also create safe spaces where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p>
National Networks National Policy Statement (NN NPS) (2014)	<p>Paragraphs 3.10 – 3.12 of the NN NPS advise that “<i>scheme promoters are expected to take opportunities to improve road safety, including introducing the most modern and effective safety measures where proportionate</i>”, and that it is the UK Government’s policy to ensure that risks of rail passenger and workforce accidents are reduced so far as reasonably practicable.</p>
Crime and Disorder Act, 1998	<p>The Crime and Disorder Act 1998 gave statutory responsibility to local authorities, the police, and key partners to reduce crime and disorder in their communities. Responsible authorities, commonly referred to now as Community Safety Partnerships (CSPs), were required to carry out audits every three years and to implement crime reduction strategies.</p>

Document	Key Messages/ Issues
Highways England Delivery Plan 2015-2020, 2015	<p>Whilst the number of people KSI on UK roads has generally been declining since 2005, over the last few years the number of fatalities has remained fairly consistent with a small increase in KSIs in 2013.</p> <p>Highways England recognise that they must continue to improve safety by investing in the road network, both to prevent incidents from occurring and to reduce the severity of those that do.</p> <p>By end of 2020, they aim to have reached a target of no more than 1,393 KSIs across the network in a year. This will be achieved by a year-on-year reduction in those harmed across the network.</p>
Department for Transport, Road Investment Strategy: for the 2015/16 – 2019/20 Road Period, 2015	<p>Safety is an important consideration for road users owing to the significant impact of serious and fatal accidents. A considerable economic cost is also associated with collisions on all roads, estimated at £15 billion annually to the UK economy.</p> <p>While driverless technology still has to mature, it clearly has the potential to transform the UK’s transport networks – improving safety, reducing congestion, and lowering emissions.</p> <p>Safety and the environment suffering as congested traffic is more polluting and there is an increased risk of accidents.</p> <p>The Strategic Road Network and local networks should work together to provide flexibility and door-to door connectivity for all users. Schemes such as the A453 upgrade highlighted below do just this, and we have also set aside funding in the ring-fenced Cycling, Safety, and Integration Fund to further support connectivity with local networks.</p>
<i>Regional</i>	

Document	Key Messages/ Issues
<p>Mayor of London, London's Police and Crime Plan 2022-25</p>	<p>The Mayor's Police and Crime Plan sets out his vision for a city in which Londoners are safer – and feel safer. It sets out the key priorities and objectives for policing and community safety in London over the next three years.</p> <p>The four key themes of the Plan are:</p> <ul style="list-style-type: none"> ■ Reducing and preventing violence – preventing and reducing violence affecting young people; making London a city in which women and girls are safer and feel safer; tackling the harm caused by drugs; reducing reoffending by the most violent and high-risk groups; preventing hate crime; and working together to prevent terrorism and violent extremism. ■ Increasing trust and confidence – increasing public trust in the Metropolitan Police Service (MPS) and reducing gaps in confidence between different groups; ensuring that the MPS engages with Londoners and treats them fairly; and ensuring that the MPS, borough councils and all community safety partners respond to neighbourhood crimes such as burglary and anti-social behaviour. ■ Better supporting victims – improving the service and support that victims receive from the MPS and the criminal justice service; working to ensure victims receive a better criminal justice response and outcome; and reducing the number of repeat victims of domestic abuse and sexual violence. ■ Protecting people from being exploited or harmed – reducing the number of young people and adults who are criminally exploited or harmed; keeping young people in the justice system supported and safe; and keeping people safe online.

Document	Key Messages/ Issues
<i>Local</i>	
Tower Hamlets Council, Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The council will assist the police in their fight against crime with more council-funded uniformed police officers, conduct regular surgeries and walkabouts to listen to the community, and lend support to police ward-based forums and increased community policing. Working as part of the Tower Hamlets Community Safety Partnership, the council will support safe spaces, and tackle substance misuse, hate crime, violence against women and girls, and safeguard people who are vulnerable from exploitation and radicalisation.</p> <p>‘Priority 6: Empower Communities and Fight Crime’. Ambition is for residents, workers and visitors of all backgrounds feel safe and welcome in Tower Hamlets.</p>
Tower Hamlets Council, Community Safety Partnership Plan (2021-2024)	<p>The CSP Plan 2021-24 sets out how the council will make Tower Hamlets a safer and more cohesive place to live. The plan has been developed in response to crime, anti-social behaviour, substance misuse and re-offending statistics, and the concerns of local people. In 2021- 2024 our community safety work will focus on:</p> <ul style="list-style-type: none"> ▪ Priority 1: Tackling neighbourhood crime and antisocial behaviour (ASB) ▪ Priority 2: Tackling hate crime, community tensions and extremism ▪ Priority 3: Reducing reoffending and tackling the drivers of crime ▪ Priority 4: Safeguarding those at risk of violence and exploitation

Table E-6 – Relevant Plans, Policies, strategies and Programmes – Transport and Accessibility

Document	Key Messages/ Issues
<i>National</i>	
NPPF, 2023	<p>Paragraph 104 - Transport issues should be considered from the earliest stages of plan-making and development proposals so that potential impacts and opportunities are addressed.</p> <p>Paragraph 105 - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</p> <p>Paragraph 106 – Planning policies should:</p> <ul style="list-style-type: none"> ▪ support an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities; ▪ be prepared with the active involvement of local highways authorities; ▪ identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; ▪ provide for attractive and well-designed walking and cycling networks; and ▪ recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time <p>Paragraph 112 - address the needs of people with disabilities and reduced mobility in relation to all modes of transport.</p>

Document	Key Messages/ Issues
	Paragraph 112 – Developments should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
Department for Transport, Transport Investment Strategy, 2017	<p>This Strategy sets out how the government will build on recent transport progress and how they intend to respond realistically and pragmatically to today’s challenges.</p> <p>They aim to create a more reliable, less congested, and better-connected transport network that works for the users who rely on it. Through investment they aim to achieve:</p> <ul style="list-style-type: none"> ▪ A network that is reliable, well-managed, and safe; ▪ Journeys that are smooth, fast, and comfortable; and ▪ The right connections in the right places
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 10: Transport	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 10: Transport includes:</p> <ul style="list-style-type: none"> ▪ Policy T1 Strategic approach to transport ▪ Policy T2 Healthy Streets

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy T3 Transport capacity, connectivity and safeguarding ■ Policy T4 Assessing and mitigating transport impacts ■ Policy T5 Cycling ■ Policy T6 Car parking ■ Policy T6.1 Residential parking ■ Policy T6.2 Office Parking ■ Policy T6.3 Retail parking ■ Policy T6.4 Hotel and leisure uses parking ■ Policy T6.5 Non-residential disabled persons parking ■ Policy T7 Deliveries, servicing and construction ■ Policy T8 Aviation ■ Policy T9 Funding transport infrastructure through planning
<p>Mayor of London, Mayor’s Transport Strategy, 2018</p>	<p>The Mayor’s Transport Strategy sets out the Mayor’s policies and proposals to reshape transport in London over the next two decades. The central aim of the Mayor’s Transport Strategy is for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041, and for all Londoners to do at least 20 minutes of active travel each day by 2041.</p> <p>Key themes of the strategy:</p> <ul style="list-style-type: none"> ■ Healthy streets and healthy people – Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates ■ A good public transport experience – Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport

Document	Key Messages/ Issues
	<p>could dramatically reduce the number of vehicles on London’s streets</p> <ul style="list-style-type: none"> ▪ New homes and jobs – More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone <p>The Healthy Streets Approach is the framework of the strategy. Boroughs can deliver the Healthy Streets Approach in ways that suits the needs and aspirations of their residents and the unique character of their streets through public realm improvements and local policies that promote sustainable travel and deduce the dominance of motorised traffic. Adopting the Healthy Streets Approach is also a requirement of Local Implementation Plan funding and will help boroughs to fulfil their public health duties.</p> <p>Practical steps to achieving healthy streets for London:</p> <ul style="list-style-type: none"> ▪ Improving local environments by providing more space for walking and cycling, and better public spaces where people can interact ▪ Prioritising better and more affordable public transport and safer and more appealing routes for walking and cycling ▪ Planning new developments so people can walk or cycle to local shops, schools and workplaces, and have good public transport links for longer journeys
TfL, Healthy Streets for London, 2017	Although the initial strategy is based in London, the approach is becoming more widely adopted nationally. The Healthy Streets Approach puts people and their health at the centre of decisions

Document	Key Messages/ Issues
	<p>about how we design, manage and use public spaces. It aims to make our streets healthy, safe and welcoming for everyone.</p> <p>The Approach is based on 10 Indicators of a Healthy Street which focus on the experience of people using streets. These are as follows:</p> <ul style="list-style-type: none"> ▪ Pedestrians from all walks of life; ▪ Easy to cross; ▪ People chose to walk, cycle and use public transport; ▪ Clean air; ▪ People feel safe; ▪ Not too noisy; ▪ Places to stop and rest; ▪ Shade and shelter; ▪ People feel relaxed; and ▪ Things to see and do.
<i>Local</i>	
Tower Hamlets Council, Transport strategy 2019-41	<p>Vision: Tower Hamlets has a healthy, safe and environmentally friendly transport system that is accessible and affordable for all who live, work, study and do business in the borough. Desired outcomes:</p> <ul style="list-style-type: none"> ▪ Outcome 1: Tower Hamlets is one of the best places to walk and cycle in London ▪ Outcome 2: Car use is reduced in favour of active, efficient and sustainable transport ▪ Outcome 3: Transport services meet the needs of residents, visitors, businesses and supports growth and the economy

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ▪ Outcome 4: People feel safe and confident when travelling in the borough ▪ Outcome 5: Air quality is improved and our surroundings are quieter and more appealing ▪ Outcome 6: Travel in Tower Hamlets is accessible and affordable for all

Table E-7 – Relevant Plans, Policies, strategies and Programmes – Biodiversity and Natural Capital

Document	Key Messages/ Issues
<i>International</i>	
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)	<p>The convention has three main aims which are stated in Article 1:</p> <ul style="list-style-type: none"> ▪ To conserve wild flora and fauna and their natural habitats; ▪ To promote cooperation between states; and ▪ To give particular attention to endangered and vulnerable species including endangered and vulnerable migratory species.
Conservation of Natural Habitats and Wild Fauna & Flora (the ‘Habitats Directive’) (1992)	<p>The identification of a European network of Sites of Community Importance to be designated as SACs. A SA would need to report on any potential effects on SACs and all development plans should aim to avoid adverse effects on them.</p>

Document	Key Messages/ Issues
<p>EU (2011) EU Biodiversity Strategy to 2020 – towards implementation</p>	<p>Aimed at halting the loss of biodiversity and ecosystem services in the EU by 2020, the strategy provides a framework for action over the next decade and covers the following key areas:</p> <ul style="list-style-type: none"> ■ Conserving and restoring nature; ■ Maintaining and enhancing ecosystems and their services; ■ Ensuring the sustainability of agriculture, forestry and fisheries; ■ Combating invasive alien species; and ■ Addressing the global biodiversity crisis.
<p>EU (2013) 7th Environment Action Programme (EAP) to 2020</p>	<p>The 7th EAP guided EU environmental policy up to 2020 and set ambitions for 2050. The Programme set the following as a priority objective: “to protect, conserve and enhance the Union’s natural capital.”</p> <p>The 7th EAP reflects the EU’s commitment to the preservation of biodiversity and the ecosystem services it provides for both its intrinsic value and its contribution to economic well-being.</p> <p>The Programme highlights that integrating the value of ecosystem services into accounting and reporting across the Union and its member states by 2020 will result in the better management of natural capital.</p>
<p>The Convention on Biological Diversity’s (CBD’s) Strategic Plan for Biodiversity 2011-2020</p>	<p>This plan provides an overarching framework on biodiversity, for all biodiversity-related conventions, the entire United Nations system and all other partners engaged in biodiversity management and policy development.</p> <p>The plan consists of five strategic goals of which 20 further Aichi goals which include:</p>

Document	Key Messages/ Issues
	<p>Strategic Goal A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across Government and society.</p> <ul style="list-style-type: none"> ▪ Strategic Goal B: Reduce the direct pressures on biodiversity and promote sustainable use. ▪ Strategic Goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity. ▪ Strategic Goal D: Enhance the benefits to all from biodiversity and ecosystem services. ▪ Strategic Goal E: Enhance implementation through participatory planning, knowledge management and capacity building.
<p>Ramsar Convention on the Conservation on Wetlands of International Importance (1971)</p>	<p>The Ramsar Convention covers all aspects of wetland conservation. It has three main pillars of activities:</p> <ul style="list-style-type: none"> ▪ The designation of wetlands of international importance as Ramsar sites; ▪ The promotion of the wise use of all wetlands in the territory of each country; and ▪ International co-operation with other countries to further the wise use of wetlands and their resources. <p>While the initial emphasis was on selecting sites of importance to waterbirds, now non-bird features are increasingly taken into account, both in the selection of new sites and when reviewing existing sites.</p>
<p>Kunming-Montreal Global Biodiversity Framework (GBF)</p>	<p>The 15th Conference of Parties to the UN Convention on Biological Diversity adopted the “Kunming-Montreal Global Biodiversity Framework” which includes four goals and 23 targets for achievement by 2030.</p>

Document	Key Messages/ Issues
	<p>The implementation of the Kunming-Montreal Global Biodiversity Framework will be guided and supported through a comprehensive package of decisions also adopted at COP 15. This package includes a monitoring framework for the GBF, an enhanced mechanism for planning, monitoring, reporting and reviewing implementation, the necessary financial resources for implementation, strategic frameworks for capacity development and technical and scientific cooperation, as well as an agreement on digital sequence information on genetic resources.</p> <p>In adopting the Kunming-Montreal Global Biodiversity Framework, all Parties committed to setting national targets to implement it, while all other actors have been invited to develop and communicate their own commitments. At the next meeting of the Conference of the Parties in 2024 in Türkiye, the world will take stock of the targets and commitments that have been set.</p>
<p>UNEP and ELD, State of Finance for Nature, 2022</p>	<p>Time to act: Doubling investment by 2025 and eliminating nature-negative finance flows. The State of Finance for Nature (SFN) 2022 report quantifies public and private finance flows to nature-based solutions (NbS) to tackle global challenges related to biodiversity loss, land degradation and climate change. The SFN 2022 report reveals that if the world wants to halt biodiversity loss, limit climate change to below 1.5C and achieve land degradation neutrality by 2030, current finance flows to NbS must urgently double by 2025 and triple by 2030.</p>
<p><i>National</i></p>	
<p>The Environment Act (2021)</p>	<p>The Environment Act, which became law in 2021, acts as the UK’s new framework of environmental protection. The Environment Act allows the</p>

Document	Key Messages/ Issues
	<p>UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>The Biodiversity Gain objective requires the biodiversity value attributable to a development to exceed pre-development biodiversity value by at least 10%.</p>
<p>HM Government, 25 Year Environment Plan, 2018</p>	<p>The 25 Year Environment Plan outlines the UK Government’s ambition to leave our environment in a better state than we found it and the steps proposed to take to achieve that ambition.</p> <p>The Plan includes ten key targets of which two focus on biodiversity.</p> <p><u>Thriving plants and wildlife:</u></p> <ul style="list-style-type: none"> ■ Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term; ■ Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits; ■ Taking action to recover threatened, iconic or economically important species of animals, plants and fungi and where possible to prevent human-induced extinction or loss of known threatened species in England and the Overseas Territories; ■ Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042. <p><u>Enhancing biosecurity:</u></p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Managing and reducing the impact of existing plant and animal diseases; lowering the risk of new ones and tackling invasive non-native species; ■ Reaching the detailed goals to be set out in the Tree Health Resilience Plan of 2018; ■ Ensuring strong biosecurity protection at our borders, drawing on the opportunities leaving the EU provides; and ■ Working with industry to reduce the impact of endemic disease.
<p>HM Government, Environmental Improvement Plan 2023</p>	<p>The 25 Year Environment Plan set out the ambition to refresh the plan every five years, a commitment set into law in the Environment Act 2021. This document continues to use the ten goals set out in the 25 Year Environment Plan; however, ‘Thriving Plants and Wildlife’ has since become the apex goal. It outlines the progress made so far and how Defra intends to deliver the framework and vision of the 25 Year Environment Plan.</p>
<p>Wildlife and Countryside Act (as amended 1981)</p>	<p>The Wildlife and Countryside Act 1981 consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive) in Great Britain (NB Council Directive 79/409/EEC has now been replaced by Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version).</p> <p>The Act provides for the notification and confirmation of SSSIs and the protection of wildlife.</p>

Document	Key Messages/ Issues
<p>Working with the grain of nature: A Biodiversity Strategy for England 2002</p>	<p>The Biodiversity Strategy for England sets a fundamental shift by ensuring that biodiversity considerations become embedded in all the main sectors of economic activity, public and private. The Strategy capitalises on the opportunities presented by the report of the Policy Commission on Food and Farming and the current review of the Common Agricultural Policy.</p> <p>The Strategy sets out a programme for five years for the other main policy sectors, to make the changes necessary to conserve, enhance and work with the grain of nature and ecosystems rather than against them. It takes account of climate change as one of the most important factors affecting biodiversity and influencing policies.</p>
<p>The Natural Environment White Paper (2011)</p>	<p>The aim of the White Paper is to set out a clear framework for protecting and enhancing the things that nature gives us for free.</p> <p>Four core themes:</p> <ol style="list-style-type: none"> 1. Protecting and improving our natural environment 2. Growing a green economy 3. Reconnecting people and nature 4. International and EU leadership
<p>Making Space for Nature: A review of England’s Wildlife Sites and Ecological Network: Chaired by Professor Sir John Lawton CBE FRS (2010)</p>	<p>Species and habitats should be restored and enhanced in comparison with 2000 levels.</p> <p>Improve the long-term sustainability of ecological and physical processes that underpin the functioning of ecosystems, thereby enhancing the capacity of ecosystem services.</p>

Document	Key Messages/ Issues
	Provide accessible natural environments rich in wildlife for people to enjoy and experience.
The Natural Choice: Securing the value of nature; HM Government (2011)	Protect and enhance biodiversity through Nature Improvement Areas (NIAs), biodiversity offsetting, Local Nature Partnerships and phasing out peat use. Place natural capital at the centre of economic decision making to avoid the unintended environmental consequences that arise from undervaluing natural assets.
NN NPS, (2014)	<p>NN NPS states that development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation to counteract impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.</p> <p>Paragraphs 3.2 to 3.5 of the NN NPS state that not only should national road and rail networks be designed to minimise social and environmental impacts, but that they should also seek to improve quality of life. In part this may be achieved by <i>“reconnecting habitats and ecosystems [...] improving water quality and reducing flood risk, [...] and addressing areas of poor air quality.”</i></p> <p>Paragraph 5.162 recognises the potential for developments to provide positive environmental and economic benefits through the provision of green infrastructure. Paragraph 5.175 of the NN NPS highlights that</p>

Document	Key Messages/ Issues
	green infrastructure identified in development plans should be protected and, where possible, enhanced.
NPPF, 2023	<p>Paragraphs 174 and 179 to 182 of the NPPF require development to protect and safeguard biodiversity, and advise that development should aim to conserve, restore and enhance biodiversity adequately through mitigation or, as a last resort, using compensation. Proposals which aim to conserve or enhance biodiversity should be supported.</p> <p>Recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the UK Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.</p> <p>Paragraph 174 of the NPPF requires that planning decisions should be taken to enhance the natural environment by recognising the wider benefits from natural capital and ecosystem services. Further, Paragraph 175 requires plans to take a strategic approach to maintaining and enhancing green infrastructure networks and improving natural capital at a catchment or landscape scale.</p>
The State of Natural Capital: Restoring our Natural Assets; Natural Capital Committee (2014)	<p>The report identifies that:</p> <ul style="list-style-type: none"> ■ Some assets are currently not being used sustainably and the benefits that we derive from them are at risk; ■ There are major economic benefits to be gained from natural capital and that their value should be incorporated into decision making; and ■ A long-term restoration plan is necessary to maintain and improve natural capital for future generations.

Document	Key Messages/ Issues
<p>The State of Natural Capital; Natural Capital Committee (2020)</p>	<p>In the report, the Natural Capital Committee sets out:</p> <ul style="list-style-type: none"> ■ Despite some improvements, only limited progress has been made towards the 25 Year Environment Plan’s goals. ■ Its advice to Government that biodiversity net gain should be expanded to environmental net gain. ■ Its advice that an England wide baseline of natural capital assets should be established to measure progress towards environmental goals. <p>Natural capital should be seen as infrastructure in its own right, in recognition of its contribution to economic wellbeing.</p>
<p>Natural Environment and Rural Communities (NERC) Act 2006</p>	<p>Makes provision about bodies concerned with the natural environment and rural communities, wildlife, sites of special scientific interest, National Parks and the Broads, rights of way, and other functions relating to the environment and rural affairs. Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (or the ‘Biodiversity Duty’) states that: “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.</p> <p>You should be able to show your duty to have regard for conserving biodiversity if you have identified ways to integrate biodiversity when you:</p> <ul style="list-style-type: none"> ■ develop policies and strategies and put them into practice ■ manage the planning system ■ manage: <ul style="list-style-type: none"> – your land and buildings

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> – woodlands and nature reserves – gardens, parks and public open space – community amenities e.g., sports grounds and cemeteries – waste and pollution – energy and water – wood and plant products <ul style="list-style-type: none"> ■ develop infrastructure, such as roads, buildings or flood defences ■ make decisions about procurement ■ implement economic, environmental and social programmes
<p>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</p>	<p>10.—(1) The appropriate agency must, for each river basin district, maintain, review and keep up to date a register of the protected areas lying (whether wholly or partly) within the district. (2) The register must include the following protected areas—</p> <p>(iv) areas designated for the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in the protection of the habitats or species.</p>
<p><i>Regional</i></p>	
<p>Mayor of London, The London Plan 2021. Chapter 8: Green Infrastructure and Natural Environment</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve</p>

Document	Key Messages/ Issues
	<p>relevant stakeholders, including the local community. Chapter 8: Green Infrastructure and Natural Environment includes:</p> <ul style="list-style-type: none"> ■ Policy G1 Green infrastructure ■ Policy G2 London’s Green Belt ■ Policy G3 Metropolitan Open Land ■ Policy G4 Open space ■ Policy G5 Urban greening ■ Policy G6 Biodiversity and access to nature ■ Policy G7 Trees and woodlands ■ Policy G8 Food growing ■ Policy G9 Geodiversity
<i>Local</i>	
Tower Habitats, Tower Hamlets Local Biodiversity Action Plan 2019-2024	The Local Biodiversity Action Plan (LBAP) for Tower Hamlets sets priorities and targets for conservation of species and habitats across the borough and provides details of what actions we will undertake to achieve these targets. Organisations signed up to these actions include Council departments, Tower Hamlets Homes and other housing associations, charities such as Thames21 and community groups such as the Friends of Tower Hamlets Cemetery Park.
Tower Hamlets, Green Grid Strategy, 2017	The Green Grid Strategy provides a framework for the design and delivery of appealing walking routes and associated green infrastructure across Tower Hamlets, to secure a healthy and attractive environment for residents, workers and visitors.



Document	Key Messages/ Issues
	The strategy proposes a number of borough-wide strategic actions, a set of overarching design principles, a number of site-specific improvements.

Table E-8 – Relevant Plans, Policies, strategies and Programmes – Landscape and Townscape

Document	Key Messages/ Issues
<i>International</i>	
<p>European Landscape Convention 2000 (Became binding March 2007)</p>	<p>The Council of Europe Landscape Convention promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. Specific measures include:</p> <ul style="list-style-type: none"> ▪ raising awareness of the value of landscapes among all sectors of society and of society's role in shaping them; ▪ promoting landscape training and education among landscape specialists, other related professions and in school and university courses; ▪ the identification and assessment of landscapes, ▪ analysis of landscape change, with the active participation of stakeholders; ▪ setting objectives for landscape quality, with the involvement of the public; and ▪ the implementation of landscape policies through the establishment of plans and practical programmes.
<i>National</i>	
<p>Accessible Natural Green Space Standards in Towns and Cities: A review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)</p>	<p>English Nature (now Natural England) recommends that provision should be made of at least 2ha of accessible natural greenspace per 1000 population according to a system of tiers into which sites of different sizes fit:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ No person should live more than 300m from their nearest area of natural greenspace; ■ There should be at least one accessible 20ha site within 2km from home; ■ There should be one accessible 100ha site within 5km; and ■ There should be one accessible 500ha site within 10km.
Guidance for Outdoor Sport and Play (2015)	Fields in Trust guidance, first published in the 1930s, is based on a broad recommendation that 6 acres (2.4 hectares) of accessible green space per 1,000 head of population enables residents of all ages to participate in sport and play; 75% of local authorities adopt this or an equivalent standard (2014 Fields in Trust / David Lock Associates Survey).
Local Green Infrastructure: helping communities make the most of their landscape: Landscape Institute for Green Infrastructure Partnership (2011).	Communities should identify green infrastructure requirements in their local area through addition to or creative enhancement of the existing network. Look to enhance local landscape character, heritage and biodiversity and ensure long term management is included in an overall strategy.
Green Infrastructure: An integrated approach to landscape use. Landscape Institute Position Statement (2013)	The Landscape Institute’s most recent position statement, ‘Green Infrastructure LI Position Statement 2013’ sets out why GI is crucial to our sustainable future. The publication showcases a range of successful GI projects and shows how collaboration is key to delivering multifunctional landscapes. It also illustrates why landscape professionals should take the lead on the integration of GI.

Document	Key Messages/ Issues
National Policy Statement for National Networks (2014)	Paragraph 5.149 states that when judging the impact of a project on landscape, the decision is dependent on the nature of the existing landscape likely to be affected and the nature of the effect likely to occur. The project should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
25 Year Environment Plan (2018)	Goal 6: Enhancing beauty, heritage and engagement with the natural environment, is to “safeguard and enhance the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.”
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 3: Design	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 3: Design includes:</p> <ul style="list-style-type: none"> ■ Policy D1 London’s form, character and capacity for growth ■ Policy D2 Infrastructure requirements for sustainable densities ■ Policy D3 Optimising site capacity through the design-led approach

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy D4 Delivering good design ■ Policy D5 Inclusive design ■ Policy D6 Housing quality and standards ■ Policy D7 Accessible housing ■ Policy D8 Public realm ■ Policy D9 Tall buildings ■ Policy D10 Basement development
<p>Mayor of London, The London Plan 2021. Chapter 7: Heritage and Culture</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community. Chapter 7: Heritage and Culture includes:</p> <ul style="list-style-type: none"> ■ Policy HC3 Strategic and Local Views ■ Policy HC4 London View Management Framework ■ Policy HC5 Supporting London’s culture and creative industries ■ Policy HC6 Supporting the night-time economy ■ Policy HC7 Protecting public houses
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The</p>

Document	Key Messages/ Issues
	<p>strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> ▪ London Plan ▪ Transport ▪ Housing ▪ Economic Development ▪ Culture ▪ Health Inequalities <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> ▪ Green infrastructure. London will be the world’s first National Park City, where more than half of its area is green, where the natural environment is protected, and where the network of green infrastructure is managed to benefit all Londoners
<i>Local</i>	
Tower Hamlets Council, Tall Buildings SPD (<i>Draft</i>)	The Tall Buildings SPD is a proposed planning document that will add guidance to the design, location and development of tall buildings and address the overall impact that this development can have on local residents.

Table E-9 – Relevant Plans, Policies, strategies and Programmes – Historic Environment

Document	Key Messages/ Issues
<i>International</i>	
UNESCO, The World Heritage Convention, 1972	This convention sets out a framework for the identification and designation of cultural or natural heritage sites of ‘outstanding universal value’ as World Heritage Sites.
The Valetta Convention, 1992	<p>This convention outlines protection measures for archaeological heritage assets, including the development and maintenance of an inventory of sites. The aim of this convention is to protect sites for future study, outlines the requirements to report ‘chance finds’, as well as controlling excavations.</p> <p>The input of expert archaeologists into the making of planning policies and decisions is also required under this convention.</p>
Convention for the Protection of the Architectural Heritage of Europe, Granada (1985)	<p>The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe’s heritage. It affirms the needs for European solidarity with regard to heritage conservation and is designed to foster practical co-operation among the Parties.</p> <p>The convention considers comprising the following permanent properties, which are stated in Article 1:</p> <ul style="list-style-type: none"> ▪ Monuments: all buildings and structures of conspicuous historical, archaeological, artistic, scientific, social or technical interest, including their fixtures and fittings; ▪ Groups of buildings: homogenous groups of urban or rural buildings conspicuous for their historical, archaeological,

Document	Key Messages/ Issues
	<p>artistic, scientific, social or technical interest, which are sufficiently coherent to form topographically definable units; and</p> <ul style="list-style-type: none"> ▪ Sites: the combined works of man and nature, being areas which are partially built upon and sufficiently distinctive and homogenous to be topographically definable and are of conspicuous historical, archaeological, artistic, scientific, social or technical interest.
<i>National</i>	
NPPF, 2023	<p>Paragraph 190 states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place”.

Document	Key Messages/ Issues
NN NPS (2014)	Paragraph 5.149 states that when judging the impact of a project on landscape, the decision is dependent on the nature of the existing landscape likely to be affected and the nature of the effect likely to occur. The project should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
25 Year Environment Plan (2018)	Goal 6: Enhancing beauty, heritage and engagement with the natural environment, is to “safeguard and enhance the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.”
Planning (Listed buildings and Conservation Areas) Act 1990	This is an Act relating to special controls in respect of buildings and areas of special architectural or historic interest.
1979 Ancient Monuments and Archaeological Areas Act	Where Ancient Monuments occur on agricultural land the following Act influences the extent of public control to ensure the protection of scheduled ancient monuments.
Historic England, The Historic Environment and Site Allocations in Local Plans	This advice note supports Local Plan development and outlines how to correctly implement historic environment legislation within Local Plans. The note also outlines how to minimise harm to the significance and setting of the historic environment through site allocations, including advice on evidence gathering and site selection methodology.

Document	Key Messages/ Issues
Historic England, Sustainability Appraisal and Strategic Environmental Assessment	Advice to support the assessment of plans on the historic environment and advice on heritage considerations for SA and (SEA processes. The advice note also offers guidance on implementing historic environment legislation appropriately within plans and assessments.
Historic England, The Setting of Heritage Assets	Guidance on managing the change within the settings of heritage assets through development. Outlines the role that setting plays in the significance of heritage assets and outlines how to incorporate heritage assets and their settings in decision making of developments.
Historic England Advice Note 4 Tall Buildings 2022	This Advice Note (HEAN 4) provides advice on planning for tall buildings within the historic environment. Its purpose is to support LPAs, developers, communities and other stakeholders in dealing with tall buildings proposals within the legislative and planning framework relevant to the historic environment.
Historic England, Managing Local Authority Heritage Assets	Guidance for local authorities regarding best practice guidance on how to safeguard and enhance heritage assets, as well as bringing them into productive use.
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 7: Heritage and Culture	The London Plan (2021) is London’s Spatial Development Strategy (SDS). It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social

Document	Key Messages/ Issues
	<p>infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 7: Heritage and Culture includes:</p> <ul style="list-style-type: none"> ■ Policy HC1 Heritage conservation and growth ■ Policy HC2 World Heritage Sites
<i>Local</i>	
<p>Tower Hamlets Council, Conservation Strategy 2017-2027</p>	<p>The Conservation Strategy aims to protect and enhance Tower Hamlets’ heritage and ensure that it can be appreciated and enjoyed by current and future generations. A key part of this is to ensure increased community engagement and involvement in the heritage as a critical part of ensuring its on-going sustainability. The Strategy also aims to enhance the contribution of the heritage to other strategic priorities of the borough, to ensure that heritage plays an active role in the borough’s on-going regeneration and development, thereby helping to improve quality of life for all.</p> <p>The vision for the Tower Hamlets Conservation Strategy consists of three aims:</p> <ul style="list-style-type: none"> ■ Aim 1 Understanding and appreciating our rich heritage, and recognising its contribution to the borough’s vibrancy and distinctiveness ■ Aim 2 Conserving and protecting the borough’s historic environment, and capitalising on opportunities for attracting investment, conservation-led regeneration and positive place shaping

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ▪ Aim 3 Enjoying, celebrating and engaging with our rich history, and promoting Tower Hamlets as a distinctive and welcoming place to live, work and visit for current and future generations
London Borough of Tower Hamlets conservation area appraisals	There are 58 conservation areas in Tower Hamlets. Each one has an adopted character appraisal and management guidelines document. These describe the architectural and historic character and significance of each area, and provide guidance to residents, businesses and other stakeholders about how the character can be preserved and enhanced.

Table E-10 – Relevant Plans, Policies, strategies and Programmes – Water Environment

Document	Key Messages/ Issues
<i>International</i>	
Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (“The Water Framework Directive”)	<p>The main aims of the Water Framework Directive (WFD) are to:</p> <ul style="list-style-type: none"> ▪ prevent deterioration and enhance status of aquatic ecosystems, including groundwater ▪ promote sustainable water use ▪ reduce pollution ▪ contribute to the mitigation of floods and droughts <p>The WFD requires the creation of River Basin Management Plans (RBMPs).</p> <p>Statutory objectives are set for Scottish waters through River Basin Management Planning. These objectives are based on ecological assessments and economic judgments. The plans cover all types</p>

Document	Key Messages/ Issues
	of water body, e.g., rivers, lochs, lakes, estuaries, coastal waters and groundwater.
Directive 2007/60/EC of the European Parliament and of the Council of 23 October 2007 on the assessment and management of flood risks	Requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk.
Directive 2006/118/EC of the European Parliament and of the Council of 12 December 2006 on the protection of groundwater against pollution and deterioration	This Directive establishes a regime which sets groundwater quality standards and introduces measures to prevent or limit inputs of pollutants into groundwater. The directive establishes quality criteria that takes account local characteristics and allows for further improvements to be made based on monitoring data and new scientific knowledge.
<i>National</i>	
NPPF, 2023 -	Paragraph 159 "... inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere".
The Environment Act (2021)	The Environment Act, which became law in 2021, acts as the UK's new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction. Objectives for targets under consideration

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> • reduce pollution from agriculture, in particular phosphorus and nitrate • reduce pollution from wastewater, in particular phosphorus and nitrate • reduce water demand • improve the quality of habitat on land, including freshwater and coastal sites, expressed through the condition of our protected sites (SSSIs) • improve the overall status of species populations on land and in freshwaters
<p>NN NPS (2014)- Paragraph 5.105</p>	<p>“... if there is no reasonably available site in Flood Zones 1 or 2, then national networks infrastructure projects can be located in Flood Zone 3, subject to the Exception Test. Both elements of the test will have to be passed for development to be consented...”</p>
<p>NN NPS (2014)- Paragraph 5.109</p>	<p>“Any project that is classified as ‘essential infrastructure’ and proposed to be located in Flood Zone 3a or 3b should be designed and constructed to remain operational and safe for users in times of flood; and any project in Zone 3b should result in no net loss of floodplain storage and not impede water flows”.</p>
<p>NN NPS (2014)- Paragraph 5.224</p>	<p>“Activities that discharge to the water environment are subject to pollution control”</p>
<p>NN NPS (2014)- Paragraph 5.225</p>	<p>“... impacts on the water environment should be given more weight where a project would have adverse effects on the achievement of</p>

Document	Key Messages/ Issues
	the environmental objectives established under the Water Framework Directive”.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)- Goal 2 ‘Clean and plentiful water’	“Improve at least three quarters of our waters to be close to their natural state as soon as is practicable by: [...] Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water”.
<i>Regional</i>	
London Sustainable Drainage Action Plan	<p>The London Sustainable Drainage Action Plan addresses a specific need to promote the awareness, and the retrofitting, of sustainable drainage systems right across London. It contains a series of actions to make our drainage system work in a more natural way which will bring a wide range of benefits including:</p> <ul style="list-style-type: none"> ▪ steadily reducing flood risks by easing the burden on our drains and sewers ▪ reducing pollution of our tributary rivers and streams ▪ creating more pleasant landscapes, streets and settings for London’s buildings ▪ providing opportunities to save water ▪ providing opportunities for school activities and studies related to the water cycle
Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure	The London Plan (2021) is London’s Spatial Development Strategy (SDS). It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs

Document	Key Messages/ Issues
	<p>should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> ▪ Policy SI 5 Water infrastructure ▪ Policy SI 12 Flood risk management ▪ Policy SI 13 Sustainable drainage ▪ Policy SI 14 Waterways – strategic role ▪ Policy SI 15 Water transport ▪ Policy SI 16 Waterways – use and enjoyment ▪ Policy SI 17 Protecting and enhancing London’s waterways
<i>Local</i>	
<p>AECOM, London Borough of Tower Hamlets Strategic Flood Risk Assessment, 2017</p>	<p>London Borough of Tower Hamlets Strategic Flood Risk Assessment (SFRA) identifies the spatial variation in flood risk across the borough thus allowing an area-wide comparison of future development sites with respect to flood risk considerations.</p>

Table E-11 – Relevant Plans, Policies, strategies and Programmes – Air Quality

Document	Key Messages/ Issues
<i>International</i>	
Ambient Air Quality Directive	The Ambient Air Quality Directive provides the current framework for the control of ambient concentrations of air pollution in the EU. The control of emissions from mobile sources, improving fuel quality and promoting and integrating environmental protection requirements into the transport and energy sector are part of these aims.
<i>National</i>	
The Environment Act (2021)	<p>The Environment Act, which became law in 2021, acts as the UK’s new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>Objectives for targets under consideration</p> <ul style="list-style-type: none"> • reducing the annual mean level of fine particulate matter (PM_{2.5}) in ambient air (as required by the Environment Bill) • in the long-term, reducing population exposure to PM_{2.5}
25 Year Environment Plan, HM Government (2018)	With regards to the transport sector, the 25 Year Environment Plan identifies four ‘early’ priorities through the ‘Future of Mobility Grand Challenge’. These include encouraging new modes of transport; addressing the challenges of moving from hydrocarbon to zero emission vehicles; and Preparing for a future of new mobility

Document	Key Messages/ Issues
	services, increased autonomy, journey-sharing and a blurring of the distinctions between private and public transport.
The Clean Growth Strategy, 2017	<p>This Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of “clean growth”, i.e., deliver increased economic growth and decreased emissions.</p> <p>Key Policies and Proposals in the Strategy:</p> <ul style="list-style-type: none"> ■ Develop world leading Green Finance capabilities; ■ Develop a package of measures to support businesses to improve their energy productivity, by at least 20 per cent by 2030; ■ Improving the energy efficiency of our homes; ■ Rolling out low carbon heating; ■ Accelerating the shift to low carbon transport; ■ Delivering clean, smart, flexible power emissions; and ■ Enhancing the benefits and value of our natural resources.
NN NPS (2014)- Paragraph 5.12	Accords air quality considerations substantial weight where, after taking into account mitigation, a scheme would lead to a significant air quality impact in relation to Environmental Impact Assessment (EIA) and/ or where they lead to deterioration in air quality in a zone/ agglomeration.
Clean Air Strategy 2019	Addresses action to reduce emissions from transport “as a significant source of emissions of air pollution”, in-particular oxides of nitrogen (NO _x) – which is responsible for high levels of NO ₂ in ambient air, especially in urban areas - and particulate (PM ₁₀ and PM _{2.5}) emissions.
<i>Regional</i>	

Document	Key Messages/ Issues
<p>Mayor of London, London Local Air Quality Management (LLAQM), 2019</p>	<p>The Mayor’s LLAQM framework is the statutory process used by local authorities to review and improve air quality within their areas. The new LLAQM made updates to:</p> <ul style="list-style-type: none"> ■ Ensure boroughs are taking ambitious action, which is properly co-ordinated at the regional level, and which supports Mayoral objectives including those set out in the London Environment Strategy; ■ Ensure that London boroughs continue to work towards achievement of World Health Organisation safe limits for pollutants even when legal limits are met; ■ Update information in the guidance documents to reflect new research, policies, and priorities; and ■ Update Cleaner Air Borough Status (a recognition scheme for boroughs that was introduced under the previous Mayor) so that it is transparent and fair, now promotes continual improvement, and clearly aligns with new LLAQM priorities. <p>As part of LLAQM, all London boroughs must submit Annual Status Reports (ASRs).</p>
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community. Chapter 9: Sustainable Infrastructure includes:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ▪ Policy SI 1 Improving air quality
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> ▪ London Plan ▪ Transport ▪ Housing ▪ Economic Development ▪ Culture ▪ Health Inequalities <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> ▪ Air quality. London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities
<p><i>Local</i></p>	
<p>Tower Hamlets Council, London Borough of Tower Hamlets Air Quality Action Plan 2022 – 2027</p>	<p>This Air Quality Action Plan (AQAP) has been produced as part of our responsibility under London Local Air Quality Management. The AQAP outlines the action to improve air quality in the London Borough of Tower Hamlets (LBTH) between 2022 – 2027.</p>

Document	Key Messages/ Issues
	<p>Priorities:</p> <ul style="list-style-type: none"> ■ Continue monitoring air pollutants and carrying out other core statutory duties to improve air quality within the Borough ■ Reducing emissions from developments and buildings ■ Increasing public health and awareness raising to reduce exposure to air pollution ■ Working with businesses in delivery servicing and freight to decrease air emissions ■ Reducing emission from Council fleet ■ Localised solutions such as expanding and improving green infrastructure, Low Emission Neighbourhoods (LENs) (subject to securing funding), replacing boilers and implementing insulation schemes in schools and Council properties, etc. ■ Improving cleaner transport within the Borough through transport and air quality policies, idling enforcement, car free days, pedestrianisation schemes projects, installation of electric vehicle charging points, and supporting walking and cycling.

Table E-12 – Relevant Plans, Policies, strategies and Programmes – Climate Change and Greenhouse Gases

Document	Key Messages/ Issues
<i>International</i>	
Kyoto Protocol to the UN Framework Convention on Climate Change (1992) Doha Amendment to the Kyoto Protocol (2012)	Developed countries commit themselves to reducing their collective emissions of six key greenhouse gases by at least 5%. Each country’s emissions target must be achieved by the period 2008-2012. Doha Amendment saw parties commit to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020.
The Paris Agreement, 2015	Aims to limit the global warming change to below 2°C above pre-industrial levels. However, countries aim to limit the increase to 1.5°C to reduce the impacts of global warming. The EU has committed to a binding target of a reduction of at least 40% in greenhouse gas emissions by 2030 compared to 1990
IEMA (2023) Practical steps for decarbonising local plans	<p>Toolkit to help close the gaps between climate action plans and the planning process, and to improve the plan’s evidence base. IEMA’s climate change and energy policy steering group has worked with IEMA members in the planning and infrastructure emissions fields to create a simple set of stages for local authorities to follow.</p> <ul style="list-style-type: none"> ▪ Stage one provides a clear understanding of baseline emissions and future carbon budgets. ▪ Stage two shows simple steps for calculating emissions linked to alternative policy options. ▪ Step three describes how the monitoring process feeds back into the review.

Document	Key Messages/ Issues
	Critically, the toolkit shows how each of the stages interacts with the authority’s climate action plan.
<i>National</i>	
NPPF, 2023	<p>Paragraph 154 of the NPPF states that “New development should be planned for in ways that:</p> <p>a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and</p> <p>b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the UK Government’s policy for national technical standards.”</p>
The Climate Change Act, 2008	<p>Improve carbon management and help the transition towards a low carbon economy in the UK.</p> <p>Demonstrate strong UK leadership internationally, showing the commitment to taking shared responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen in 2009.</p> <p>Greenhouse gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.</p>

Document	Key Messages/ Issues
<p>NN NPS, 2014</p>	<p>Paragraph 4.38 of the NN NPS states that “<i>New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure.</i>”</p> <p>The NN NPS also requires carbon impacts to be considered as part of the appraisal of scheme options, and an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. <i>It goes on to state that “it is very unlikely that the impact of a road project will, in isolation, affect the ability of UK Government to meet its carbon reduction plan targets.”</i></p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment, 2018</p>	<p>The 25 Year Environment Plan outlines the UK Government’s ambition to leave our environment in a better state than we found it and the steps proposed to take to achieve that ambition.</p> <p>Mitigating and adapting to climate change:</p> <p>Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases. The UK Climate Change Act 2008 commits us to reducing total greenhouse gas emissions by at least 80 per cent by 2050 when compared to 1990 levels;</p> <p>Making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century; and</p>

Document	Key Messages/ Issues
	Implementing a sustainable and effective second National Adaptation Programme.
UK Committee on Climate Change, Interim UK Carbon Budgets	<p>The UK has committed to an 80% reduction in its greenhouse gas emissions by 2050. In order to help meet this target, the UK Committee on Climate Change (CCC) has devised a series of interim UK “carbon budgets” as follows:</p> <ul style="list-style-type: none"> ■ 1st carbon budget (2008 to 2012): 23% reduction; ■ 2nd carbon budget (2013 to 2017): 29% reduction; ■ 3rd carbon budget (2018 to 2022): 35% reduction by 2020; ■ 4th carbon budget (2023 to 2027): 50% reduction by 2025; ■ 5th carbon budget (2028 to 2032): 57% reduction by 2030.
25 Year Environment Plan, HM Government (2018)	Goal 7 of the 25 Year Environment Plan, ‘Mitigating and adapting to climate change’, is to “take all possible action to mitigate climate change, while adapting to reduce its impact” by “continuing to cut greenhouse gas emissions including from land use, land use change...” and “making sure that all policies, programmes and investment decisions consider the possible extent of climate change this century”.
<i>Regional</i>	
Mayor of London, London Environment Strategy, 2018	The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.

Document	Key Messages/ Issues
	<p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> ▪ London Plan ▪ Transport ▪ Housing ▪ Economic Development ▪ Culture ▪ Health Inequalities <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> ▪ Adapting to climate change. London and Londoners will be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought ▪ Climate change and energy. London will be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> ▪ Policy SI 2 Minimising greenhouse gas emissions

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy SI 4 Managing heat risk
<i>Local</i>	
Tower Hamlets Council, Net Zero Carbon Plan, 2020	<p>The borough council is implementing its Net Zero Carbon Plan which sets out their goals and commitment to tackling the climate emergency. Objectives of the plan:</p> <ul style="list-style-type: none"> ■ A Net Zero Carbon Council by 2025 – In March 2019, Tower Hamlets Council declared a climate emergency. The Council is now aiming to be Net Zero Carbon by 2025. This report shows that it is possible but that it will require decisive action starting now to reduce direct emissions by 75%. The residual emissions will have to be offset ■ A Net Zero Carbon Borough by 2050 – This report also recommends that Tower Hamlets Council uses its powers, influence and leadership to put the Borough on the right track to achieve Net Zero Carbon by 2050 (or earlier if possible)
Tower Hamlets Council, Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The council is commitment to be carbon neutral by 2025 and a carbon neutral borough by 2045. The commitments mean will reduce and offset the amount of carbon created as a council and borough partnership.</p> <p>‘Priority 6: A clean and green future’. Ambition is that cleanliness and air quality improve, emissions and noise</p>



Document	Key Messages/ Issues
	nuisance reduce, and everybody benefits from parks and more trees.

Table E-13 – Relevant Plans, Policies, strategies and Programmes – Material Assets

Document	Key Messages/ Issues
<i>National</i>	
The Environment Act (2021)	<p>The Environment Act, which became law in 2021, acts as the UK’s new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>Objectives for targets under consideration</p> <ul style="list-style-type: none"> ■ increase resource productivity ■ reduce the volume of ‘residual’ waste we generate
NPPF, 2023	<p>Paragraph 174 states: “... <i>contribute to and enhance the natural and local environment by:</i></p> <ul style="list-style-type: none"> ■ Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils...; ■ Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability...; and ■ Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”. <p>Paragraph 17 also seeks to facilitate the sustainable use of minerals.</p>

Document	Key Messages/ Issues
	<p>Paragraph 210 encourages so far as practicable, planning policies should “<i>take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously</i>”.</p> <p>Paragraph 183 states: “<i>Planning policies and decisions should ensure that:</i></p> <ul style="list-style-type: none"> (a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation) (b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and (c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.
<p>NN NPS (2014)</p>	<p>Paragraph 5.117 requires land stability to be considered in respect of new development. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability.</p> <p>Paragraph 5.168 states “<i>Applicants should also identify any effects, and seek to minimise impacts, on soil quality, considering</i></p>

Document	Key Messages/ Issues
	<p><i>any mitigation measures proposed. Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this”.</i></p> <p>Paragraph 5.19 states “<i>Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout and use of materials) in both design and construction should be presented”.</i></p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment (2018)</p>	<p>Goal 5 ‘Clean and plentiful water’ involves using resources from nature more sustainably and efficiently. The plan states: “<i>Improve our approach to soil management: by 2030 we want all of England’s soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches”.</i></p>
<p>Our Waste, Our Resources: A Strategy for England (Dec 2018)</p>	<p>Sets out how the UK Government aims to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.</p>
<p><i>Regional</i></p>	
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social</p>

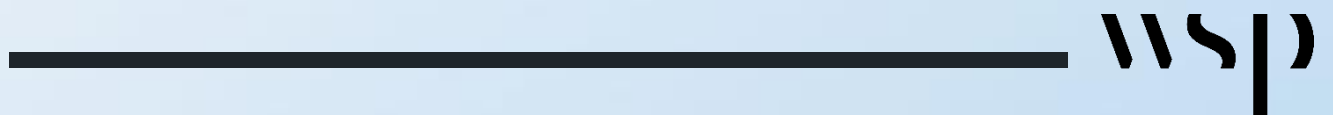
Document	Key Messages/ Issues
	<p>infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> ■ Policy SI 3 Energy infrastructure ■ Policy SI 7 Reducing waste and supporting the circular economy ■ Policy SI 8 Waste capacity and net waste self-sufficiency ■ Policy SI 9 Safeguarded waste sites ■ Policy SI 10 Aggregates ■ Policy SI 11 Hydraulic fracturing (Fracking)
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> ■ London Plan ■ Transport ■ Housing ■ Economic Development ■ Culture ■ Health Inequalities

Document	Key Messages/ Issues
	<p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> ■ Waste. London will be a zero waste city. By 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65 per cent of London’s municipal waste will be recycled <p>Chapter 7 sets out policies and proposals for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining.</p>
<i>Local</i>	
<p>Tower Hamlets Council, ‘Don’t let our future go to waste’ Waste management strategy 2018-30</p>	<p>The six key priorities framing the waste management strategy are intended to guide a series of policies and targets to help the council achieve better services for residents, leading to a cleaner, greener Tower Hamlets. These priorities are set to remain relevant until 2030 and will be reviewed every four years alongside the reduction and recycling plan. This will allow any key legislative or policy changes to be incorporated into the strategy if necessary. The waste management strategy sets out six priorities to guide the way the council develops and improves work over the next 12 years:</p> <ul style="list-style-type: none"> ■ Collaboration at the heart of change – The more we work together, the more waste we can reduce, reuse and recycle. ■ Supporting people to love their neighbourhood – We will design services with our users in mind to encourage everyone to love their neighbourhood and take responsibility for their own waste ■ Supporting people to reduce, reuse, and recycle – We will encourage and enable everyone to follow the three R’s in their daily lives to lower our environmental impact.

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Making waste a resource – We will provide opportunities for our service users to keep materials in use rather than throwing them away. ■ Reducing carbon and improving air quality – We will help improve local air quality by cutting emissions from our waste management activities. ■ Building our green economy – We will capitalise on ‘green opportunities’ for our residents and businesses where possible.
<p>Tower Hamlets Council, Reuse, Recycling & Waste SPD, 2021</p>	<p>The Tower Hamlets Reuse, Recycling and Waste SPD which sets out guidance for developers on how waste management should be addressed in proposals for new residential and mixed-use development. The SPD covers the entire borough and aims to re-examine and improve the way in which waste is produced and managed. The Reuse, Recycle and Waste SPD was prepared under Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>

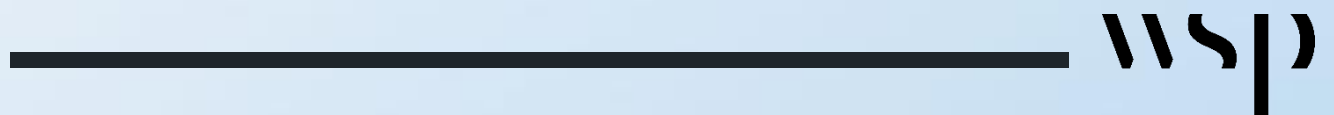
Appendix F

Assessment of Draft Policies



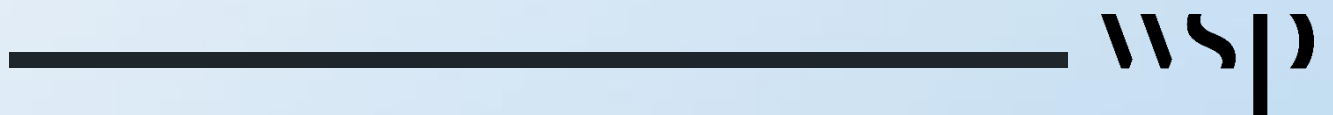
Appendix G

Assessment of Sites and Site Alternatives



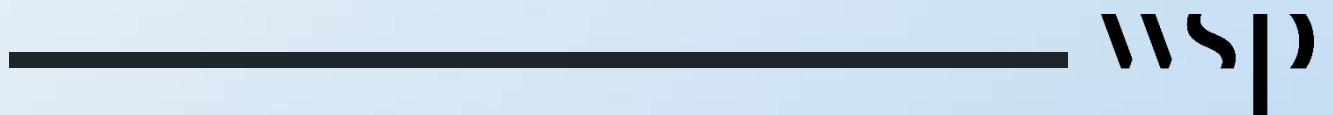
Appendix H

Equalities Impact Assessment



Appendix I

Health Impact Assessment





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London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix F - Assessment of Policies



London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix F - Assessment of Policies

Type of document (version) Public

Project no. 70103752

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Date: July 2024

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Quality control

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
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Prepared by	Charlotte Town	Emily Astins Emily Bonnett	Charlotte Town	Charlotte Town
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Signature				
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Signature				
Project number	70103752	70103752	70103752	70103752

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1 Introduction

1.1.1. This Appendix sets out the detailed findings of the assessment of the draft policies.

1.1.2. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 1-1** below. The performance of the draft policies against each IIA objective and **Tables 2-1 to 2-10** show the summary of significant effects based on each IIA objective.

Table 1-1 – Significance of Effect

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local / regional / national)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

2 Assessment of Draft Policies

2.1 Delivering the Local Plan

The assessment of the Delivering the Local Plan Policies are presented in **Table 2-1** below.

Table 2-1 – Delivering the Local Plan

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	L	D	L	I	P	LT	<p>Policy DV1 (areas of growth and opportunity within Tower Hamlets) requires development to provide community infrastructure, and upgrade utilities infrastructure. This will provide improved infrastructure for both the current and future populations.</p> <p>Similarly, Policy DV7 (utilities and digital connectivity) ensures sufficient infrastructure, including electricity water, sewage, and digital infrastructure, for current and future populations within development proposals.</p> <p>Policy DV6 (Social Value) aims to maximise the delivery of social value to positively contribute community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This can play a pivotal role in advancing equality.</p> <p>Similarly, Policy DV5 (Developer contributions) may also help to contribute to community project and facilities through Community Infrastructure Levy (CIL) payments.</p> <p>Policy DV8 (Site allocations) requires developers to discuss changes to social infrastructure and any alternative requirements as they arise on particular sites.</p>
IIA2: Human Health	++	M	D	R	I	P	LT	<p>Policy DV1 provides new community infrastructure, including health centres and leisure facilities. This improves healthcare provision and encourages physical activity amongst the population.</p> <p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes contributing to the development of healthy environments, encouraging physical activity and promoting good mental and physical wellbeing.</p> <p>Policy DV3 (healthy communities) requires developments to provide healthy environments for physical and mental wellbeing. This also includes the requirement for major developments to undertake a rapid health impact assessment. This is likely to result in positive developments for health and physical activity, resulting in improvements to physical and mental wellbeing amongst residents of the borough.</p> <p>Policy DV7 (utilities and digital connectivity) provides improvements to broadband infrastructure. This is likely to improve mental well-being for isolated communities.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy DV8 (Site allocations) ensures that required infrastructure is delivered on earlier phases of development as far as possible. This is likely to result in positive developments for health as access to services will be prioritised. The policy also improves health through the publicly accessible open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.
IIA3: Economy & Town Centres	++	M	D	R	I	P	LT	<p>Policy DV1 directs development proposals towards the borough's opportunity areas within the City Fringe, Poplar Riverside, Isle of Dogs and South Poplar. This is likely to boost economic investment and growth within these areas. The policy also promotes a thriving economy through supporting development within the borough's strategic industrial locations, local industrial locations, and non-designated industrial sites. There is also focus upon ensuring town centres provide a range of uses and are accessible.</p> <p>Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This could include opportunities to support local businesses and enterprises.</p>
IIA4: Employment & Skills	++	M	D	R	I	P	LT	<p>Policy DV1 protects and enhances employment locations within the borough, as well as supporting a mix of employment opportunities across the borough. This also includes promoting affordable work space, to encourage a diverse range of employment opportunities.</p> <p>Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This could include opportunities to support local enterprises, businesses and training opportunities.</p>
IIA5: Housing	+	M	D	R	I	P	LT	Policy DV5 states that development proposals will be required to enter into Section 106 agreements to provide affordable housing. It also states that as vacant building credit has the potential to adversely impact the borough's ability to meet the affordable housing target, it will not apply and act as an exemption from its application in the borough.
IIA6: Crime & Safety	+	M	D	L	R	T	MT	Policy DV2 aims to empower the local community and deliver healthier, more inclusive, safer and cleaner spaces throughout the borough. Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. An example provided by the policy includes demonstrating spatial and environmental improvement works that improve health and well-being, adopt gender inclusive design and create safer spaces.
IIA7: Sustainable Transport	+	M	D	R	I	P	LT	<p>Policy DV1 directs developments towards locations with good public and active travel links. This is likely to encourage a modal shift away from private vehicles and encourage utilisation of public and active travel. This is also encouraged through the development of green grid projects.</p> <p>Policy DV2 includes the support for developments where they contribute towards a clean and green future. This includes delivering social and transport infrastructure improvements.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A8: Accessibility	++	M	D	R	I	P	LT	<p>Policy DV1 directs developments towards locations with good public and active travel links. It also aims to improve the transport network and wider strategic and local connections. This is likely to encourage a modal shift away from private vehicles and encourage utilisation of public and active travel and support greater accessibility to the borough's services.</p> <p>Policy DV1 provides new community infrastructure, including health centres and leisure facilities. This will provide greater access to facilities and services within the borough.</p>
I/A9: Biodiversity & Natural Capital	+	M	D	R	I	P	LT	<p>Policy DV1 supports Green Grid projects which will deliver appealing walking routes (such as the Lea River Park and Whitechapel Green Spine) and associated green infrastructure across the borough. This will help to provide new green infrastructure and a variety of new habitats.</p> <p>Policy DV4 (Planning and construction of new development) requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which includes consideration for urban ecology.</p> <p>Policy DV8 (Site allocations) require development proposals on site allocations to provide new publicly accessible open space of at least 0.4ha, and where strategic publicly accessible open spaces are required, provision of at least one hectare of contiguous open space. This can contribute to habitat creation and will be of importance to habitat connectivity, assisting statutory requirements to retain and enhance biodiversity.</p>
I/A10: Landscape & Townscape	+	L	D	L	R/I	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes preserving and enhancing the character and setting of the area.</p>
I/A11: Historic Environment	+	L	D	L	R	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes not resulting in unacceptable impacts on the historic environment.</p> <p>Policy DV4 requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which includes consideration for archaeology and built heritage.</p>
I/A12: Flooding	++	L	D	L	I	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes mitigating flood risk.</p> <p>Policy DV4 requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which include flooding.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy DV8 includes the requirement for development in close proximity to water courses to incorporate buffer zones to support flood risk management, mitigating flood risk.
I/A13: Water Quality	+	L	D	L	R	T	MT	Policy DV4 requires all major development proposals should sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which include water pollution.
I/A14: Air Quality	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes reducing the impacts of poor air quality. Additionally, zero carbon construction is likely to contribute to reduced emissions and minimisation of poor air quality associated with construction.
I/A15: Climate Change & Resilience	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes zero carbon construction, low carbon energy and heat production, this contributes to reducing the embodied carbon within developments. Policy DV7 (utilities and digital connectivity) supports decarbonised heat networks and net zero carbon emissions for energy systems. This reduces the waste heat from developments.
I/A16: GHG Emissions	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes utilising local goods and services, supporting low carbon energy and heat production, zero carbon construction, reducing GHG emissions. Policy DV8 (Site allocations) require development proposals on site allocations to provide new publicly accessible open space of at least 0.4ha, and where strategic publicly accessible open spaces are required, provision of at least one hectare of contiguous open space. The addition of open space can improve climate resilience and help to reduce the Urban Heat Island (UHI) effect.
I/A17: Waste	+	L	D	L	R	P	LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes utilising circular economy principles and reusing and recycling of buildings and resources.
I/A18: Efficient use of Land	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> These Policies are likely to have positive in-combination effects with the majority of policies within the NLP, most notably Community Infrastructure, Town Centres and Inclusive Economy and Good Growth Policies. <p>Inter-project:</p> <ul style="list-style-type: none"> The polices are expected to have concordant outcomes with the associated London Plan Policies and will resultantly lead to positive cumulative effect for LBTH. 							

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> The London Plan policy D1 seeks to understand the existing context of the borough in order to inform the areas capacity and needs for growth. In doing so, the policy ensures that development will be inclusive. This aligns with policy DV2 from the NLP which seeks to contribute towards inclusive environments throughout the borough. 							
Mitigation and Enhancement Measures	No mitigation measures have been outlined for these policies. Mitigations are likely to be based on site specific information once development sites have come forward.							
HIA and EqIA Findings/considerations	<p>EqIA</p> <ul style="list-style-type: none"> Mitigations are likely to be based on site specific information once development sites have come forward. New and improved facilities will likely be accessible and therefore beneficial to all borough residents. Consideration of social value added will ensure community, culture and diversity are upheld through development. <p>HIA</p> <ul style="list-style-type: none"> The Delivering the local plan policies outlined set out a holistic approach to the development of the NLP, and as such, are anticipated to bring about a high degree of positive effect across numerous social groups. By ensuring developers maximise contributions to the delivery of affordable housing, a greater proportion of the borough's population will be positioned to access housing. Social value contributions also include the adoption of gender inclusive design and creation of safer spaces, which will be of particular benefit to women and girls. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income. There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities. The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile. LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness There is a need to provide more greenspaces and high-quality public realm which can provide social spaces 							
Recommendations	Policy DV6 could incorporate community engagement within the policy. It is implied within the supporting text but the important role it plays in adding social value to new developments isn't overly clear.							

2.2 Homes for our Community

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-2** below.

Table 2-2 – Homes for Our Community Policies Assessment

Policy Grouping	Homes for our Community							
Policy Codes	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	H	D	R	I	P	LT	<p>The policies aim to provide an appropriate mix of different sized homes, specialist and supported living, shared living and the protection of gypsy and traveller sites will help to reduce inequalities with access to housing, particularly for those in the community that are most vulnerable.</p> <p>Policy HF1 (Meeting housing needs) aims to prioritise specific groups including families with children, older people, disabled and vulnerable, key workers and service families, students and gypsies and travellers. In addition, the policy supports estate regeneration schemes that deliver homes across all tenures and provide improved social facilities, areas of high quality and multifunctional public realm and enhanced environmental amenity.</p> <p>Policy HF2 (Affordable housing and housing mix) requires development proposals to optimise the delivery of affordable housing, with the expectation of meeting the target of 50% affordable housing. The policy supports the reduction of poverty and inequalities in the borough and facilitates improvements in access to housing for low income groups.</p> <p>Policy HF9 (Housing Standards and Quality) also states that affordable housing should not be externally distinguishable in quality from private housing, which will ensure that low income groups will not be discriminated against. The policy also includes measures for wider accessibility within developments, ensuring inclusive access for all residents.</p>
I/A2: Human Health	++	H	D	R	I	P	LT	<p>The policies aim to provide an appropriate mix of different sized homes, specialist and supported living, shared living and the protection of gypsy and traveller sites. As housing is a social determinant of health, significant positive effects will also result.</p> <p>Policy HF4 (Supported and specialist housing and housing for older people) aims to seek opportunities to integrate the development into the wider area should also be explored to encourage a sense of belonging (especially among people from different generations) as well as to protect against the health impacts of loneliness and isolation.</p>
I/A3: Economy & Town Centres	++	M	I	R	I	P	LT	<p>The provision of new housing will benefit the local economy as the connectivity between employment centres and housing markets will be improved, and spending within the local communities will increase.</p>

Policy Grouping		Homes for our Community						
Policy Codes		HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA4: Employment & Skills	+	H	D	R	R	T	MT	All policies support the provision of a variety of new housing, which will indirectly provide employment opportunities. The construction and maintenance of these housing developments will likely provide high numbers of jobs.
IIA5: Housing	++	H	D	R	I	P	LT	<p>All policies will help to deliver at least 52,095 (+ London Legacy Development Corporation (LLDC)) new homes across the borough between 2023-2038, which exceeds the target of 34,730 new homes between 2019/20 and 2028/29. These will ensure a variety of housing will be delivered to meet the needs of all residents inclusively.</p> <p>In addition to the delivery of new housing, Policy HF3 (Protection of existing housing) aims to protect existing housing, particularly ensuring that the supply of self-contained homes and in particular family-sized homes is maintained.</p> <p>Policy HF7 and HF8 require development proposals for large-scale purpose-built shared living spaces and houses in multiple occupation (HMOs) to provide a cash-in-lieu contribution to the provision of affordable housing elsewhere in the borough. A monetary solution will be unlikely to address the issue of spatial availability in the borough and so the provision of affordable housing may be compromised in some locations by this suggestion.</p>
IIA6: Crime & Safety	+	L	I	L	R	T	MT	Policy HF5 (Gypsy and traveller accommodation) the proposed site is suitable for housing and in an accessible, safe location. This will help to ensure the safety of this often marginalised group. Policy HF9 (Housing Standards and Quality) states that any community amenity space associated with major developments must be overlooked by habitable rooms to ensure safety and surveillance. This may help to deter crime and improve overall feeling of safety.
IIA7: Sustainable Transport	+	L	I	L	I	P	LT	Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected and in close proximity to public transport. This will help to encourage the use sustainable transport modes and reduce private car use.
IIA8: Accessibility	+	L	I	L	I	P	LT	Policy HF1 (Meeting housing needs) will help to ensure that where possible development will be in highly accessible locations along transport corridors. Similarly, Policy HF5 (Gypsy and traveller accommodation) states that development proposals must demonstrate that they are accessible in terms of location and individual mobility needs. This will help to ensure older people can remain independent. Policy HF8 (Housing with shared facilities (houses in multiple occupation)) states that developments should be located are located in an area of high transport accessibility.
IIA9: Biodiversity & Natural Capital	+/-	H	D/I	R	R/I	P/T	ST/L T	Depending upon the location of sites, there may also be temporary disturbances to habitats and species during construction. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. This could result in increases in biodiversity and natural capital through the provision of habitats and green infrastructure.

Policy Grouping		Homes for our Community						
Policy Codes		HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/L T	There is potential for housing developments to detract from the landscape and townscape, through land take and poor design. Depending upon the location of sites, there may also be temporary loss to the setting and tranquillity of some areas of the borough which have high landscape and townscape values, from dust, construction traffic, noise and vibration. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. If sensitively designed this could help to improve the setting of the local landscape and townscape adding to its value.
I/A11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>There is potential for housing developments to result in the loss of heritage assets (designated, non designated and buried archaeology), through land take as well as possible degradation from poor design. Depending upon the location of sites, there may also be temporary disturbances to the setting of heritage assets during construction from dust, construction traffic and noise and vibration. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. If sensitively designed this could help to improve the setting of the local historic environment adding to its value.</p> <p>Policy HF5 (Gypsy and traveller accommodation) is the only policy that ensures that developments employ high quality design and are sympathetic to local character and heritage. It is not clear whether other sites will also have the same level of consideration to the historic environment. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented, though it is expected that they will be single storey in nature and should not impact greatly on the setting of neighbouring heritage assets.</p>
I/A12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	Policy HF5 (Gypsy and traveller accommodation) is the only policy that ensures that developments are located away from areas of high flood risk (flood zone 3). It is not clear whether other sites which may come forward as a result of these policies will have the same considerations. Urban intensification and additional housing in the borough could increased flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.
I/A13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A14: Air Quality	+/-	M	D/I	R	R/I	P/T	ST/ LT	Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected to public transport. This will help to encourage the use sustainable transport modes and reduce private car use. Allowing residents to live more locally may also reduce emissions and improve overall air quality. The inclusion of parks and green spaces as per Policy HF1 will also help to improve air quality. However, construction of housing is likely to result in temporary worsening of air quality during construction.

Policy Grouping		Homes for our Community						
Policy Codes		HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	+	L	I	L	I	P	LT	<p>Policy HF1 (Meeting housing needs) aims to create sustainable places and quality living environments, however, it is not clear whether this will ensure climate resilient design.</p> <p>Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected to public transport. This will help to encourage the use sustainable transport modes and reduce private car use. Allowing residents to live more locally may also reduce emissions and improve. The inclusion of parks and green spaces as per Policy HF1 (Meeting housing needs) will also help to reduce levels of overheating within the borough.</p>
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	The development of housing is likely to result in significant levels of embodied carbon. Policy HF1 (Meeting housing needs) aims to create sustainable places and quality living environments, however, it is not clear whether this will include measure that will reduce GHG emissions and include renewable energy generation. As many of these measures will be determined by scheme level design, uncertain effects have been identified.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Housing development proposals which will come forward as a result of these policies are likely to be resource intensive and could generate a significant amount of construction waste. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
IIA18: Efficient use of Land	+/-	H	D	R	I	P	LT	As stated in Policy HF1 (Meeting housing needs), although housing growth will be primarily focused in the locations which may result in the repurposing of some land, the borough's limited area requires optimising delivery capacity where opportunities arise, which will be achieved by the regeneration of previously developed land, the intensification of the built form in opportunity areas.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There is potential for negative cumulative and synergistic effects on biodiversity, landscape and townscape, historic environment, air quality, GHGs, flooding and efficient use land if multiple developments were to come forward. These may conflict with policies PS6, PS7, PS8, BO1, BO2, CG1 and CG9. Cumulative increases in hardstanding which surfaces may also increase flood risk within the borough. Multiple housing developments are also likely to be resource intensive and significantly increase levels of embodied carbon as well as emissions associated with construction. The delivery of housing is likely to have positive effects in combination with policy DV1 and DV2. <p>Inter-plan:</p> <ul style="list-style-type: none"> Positive cumulative effects are expected to arise from the London plans policy on housing quality (D6) and the NLPs housing standards and quality policy (HF9). Housing that is fit for purpose is at the forefront of both polices, with HF9 setting out the requirements for space and accessibility standards as provided by the London Plan itself. Included in this is requirements for private internal space, access to external open space, and adequate daylight and privacy. housing in the NLP aligns with policy D7 in the London Plan. Both seek to provide housing that is genuinely suitable for London's diverse population, including at least 10% if dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. The positive cumulative effects of these policies will aid the borough population in need of specialist housing including the elderly and disabled groups. A strong focus on play and recreational space across both the London Plan and NLP will drive positive cumulative effects. The shared aim for residential developments to incorporate good-quality, accessible play provision within policy HF1 and S4 will generate positive effects for the greenspace accessibility of residents throughout the borough. 							

Policy Grouping	Homes for our Community							
Policy Codes	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> There is the potential for negative cumulative effects to arise on housing in combination with London Plan 2021 policies. London Plan Policy SD5 does not promote the provision of off-site affordable housing or cash-in-lieu contributions, unless under exceptional circumstances; conflicting with NLP Policies (HF7 and HF8). 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible. Mitigation for IIA11 is likely to be offered by proposed Policy PS6 which aims to reduce the potential impacts on the historic environment. Mitigation for IIA12 is likely to be offered by proposed Policy CG6 which aims to manage flood risk from all sources. 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> The emphasis on affordable family sized housing with a view to combat overcrowding in the borough is also beneficial to families with children. Estate regeneration should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out. The provision of specialist housing to offer supported living to those with additional needs will support a range of protected characteristics in the borough. <p>HIA</p> <ul style="list-style-type: none"> The policies are anticipated to bring about a high degree of positive effect across numerous social groups. Social cohesion is highly supported by this theme. Regeneration as well as new provision is required to provide residents with a high-quality built environment, including access to community facilities. The requirement of development proposals to maximise the delivery of affordable homes under this theme will be especially beneficial to the health and wellbeing of low-income groups who are reliant on affordable housing. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> There is significant need for affordable properties to buy and rent, however, rising costs of living and above average house prices are affecting the number of residents able to afford to buy. There are significant levels of overcrowding in the borough The Covid-19 pandemic and rising cost of living is increasing levels of homelessness. The lack of affordable housing means that young people and/or lower income groups are missing out. 							
Recommendations	<ul style="list-style-type: none"> It should be noted that the Decent Home Standard is currently applicable to the social rented sector whilst the Decent Homes Standard in the private rented sector is undergoing consultation. More information could be provided on what the policies mean by 'sustainable' residential development i.e., does this include renewable energy regeneration, use of sustainable materials, well located to sustainable transport etc. Policy HF5 (Gypsy and traveller accommodation) is the only policy that makes ensures that developments employ high quality design and is sympathetic to local character and heritage - this should also be included in Policy HF1. 							

2.3 Clean, Green Future

The assessment of the Clean, Green Future Policies are presented in **Table 2-3** below.

Table 2-3 – Clean, Green Future Policies Assessment

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	L	I	R	R	P	LT	The Clean and Green Future policies will help to provide adaptation and mitigation measures which will support the borough's population both now and in the future. Provision energy efficient buildings (CG2 Low energy buildings, CG3: Low carbon energy and heating) and retrofitting (CG4 Embodied carbon, circular economy and retrofit) will help to support better quality housing stock and present energy/ cost savings for residents.
IIA2: Human Health	++	L	D/I	L	R	P	LT	Provision energy efficient buildings (CG2 Low energy buildings, CG3 Low carbon energy and heating) and retrofitting (CG4 Embodied carbon, circular economy and retrofit) will help to improve residents' health by reducing exposure to cold and air pollutants, as well as overheating within developments. Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living. Policy CG10 (noise and vibration) contributes to indirect positive effects on wellbeing through a reduction in noise within Tower Hamlets. Reductions in noise reduce the nuisance to residents, improving mental wellbeing. Policy CG11 (contaminated land and storage of hazardous substances) also acknowledges the risks that contaminated land poses to human health. This policy includes remediation measures for contaminated land and restrictions to hazardous substance use, preserving human health.
IIA3: Economy & Town Centres	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA4: Employment & Skills	+	L	I	L	R	T	MT	Design requirements as part of the Clean and Green policies could indirectly result in job opportunities particularly within the construction and renewable energy sectors.
IIA5: Housing	+	L	I	L	I	P	LT	Generally, policies within Clean and Green Future will indirectly contribute to improved housing quality within the borough, through higher quality building standards during construction, including through additional noise reduction measures, heating measures and climate resilience measures.
IIA6: Crime & Safety	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA7: Sustainable Transport	+	L	D	R	R	P	MT	Policy CG9 (air quality) outlines the promotion on low and zero emissions transport. The supporting policy text also includes the encouragement of sustainable movement patterns, this is likely to include the use of public and active transport modes. Additionally, the policy promotes the use of electric vehicles.
IIA8: Accessibility	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Policy Grouping		Clean and Green Future						
Policy Codes		CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A9: Biodiversity & Natural Capital	++	L	I	L	R	P	MT	<p>Policy CG9 (air quality) contributes to indirect positive effects upon biodiversity through improvements to air quality, improving the environment for species and habitats. The policy also includes utilising nature-based solutions to reduce air pollution. This will also contribute to increasing the biodiversity within the borough as well as protecting existing habitats from the adverse effects of air pollution.</p> <p>Additionally, Policy CG10 (noise and vibration) includes measures to minimise disturbance from new construction, this is likely to have minor positive indirect effects on local biodiversity.</p>
I/A10: Landscape & Townscape	+	L	I	L	R	P	MT	<p>Policy CG6 aims to include nature-based drainage systems and planted landscapes, which in addition to natural flood they can provide positive landscape features within the borough.</p> <p>Policies CG9 and CG10 encourages developments which will mitigate and improve poor air quality and reduce exposure to noise and vibration. Both noise and air pollution can contribute to reductions in tranquillity and the setting of townscapes and landscapes.</p>
I/A11: Historic Environment	+	L	I	L	R	P	MT	<p>The improvements to air quality outlined in Policy CG9 (air quality) contribute to indirect positive effects upon the historic environment as poor air quality contributes to the degradation of heritage assets. Therefore, improving air quality is likely to reduce degradation of assets within Tower Hamlets.</p>
I/A12: Flooding	++	M	D	R	I	P	LT	<p>Policy CG6 (flood risk) within Clean and Green Future addresses flood risk within the borough and sets out the requirements for developments that may occur within flood zones, including flood risk assessments and the restriction of highly vulnerable uses within flood zone 3a and 3b.</p> <p>The policy also sets out requirements for developments to include flood risk mitigation measures, improving resilience in flood events.</p> <p>Policy CG7 (sustainable drainage) also contributes to reducing flood risk through the implementation of SuDS and greenfield run-off rates, as well as reducing surface water run-off.</p>
I/A13: Water Quality	++	L	I	R	R	P	MT	<p>Policy CG8 requires development proposals to seek to reduce the pressure on the fresh and wastewater systems through reducing demand and increasing water efficiency. Conserving water can help to reduce the risk of environmental pollution, improve water quality and also save energy.</p> <p>Inclusion of SuDs as per CG7 can also help to improve water quality, as they mimic natural drainage regimes and reducing the transport of pollution to the water environment. This policy also supports proposals for zero discharge developments.</p>
I/A14: Air Quality	++	M	D	R	R/I	P	MT/LT	<p>Policy CG9 (air quality) addresses the poor air quality within the borough and the need for developments to mitigate and improve air quality, including promoting low or zero emission transport and reducing vehicle reliance. This is likely to contribute to improvements to air quality within the borough.</p>

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	++	M	D	R	I	P	LT	All policies within Clean and Green Future contribute to improving the climate resilience within the borough, particularly CG1 (Mitigating and adapting to a changing climate), CG5 (overheating), CG6 (which acknowledges the impact of climate change on flood risk). Climate change is likely to result in increased heating and rainfall events, therefore these policies increase the resilience to this through prevention of overheating and the consideration of flood risk within developments, including the implementation of SuDS.
IIA16: GHG Emissions	++	M	D/I	L	I	P	LT	The majority of policies within Clean and Green Future contribute to reducing GHG emissions through the reduction in energy usage, and vehicle reliance. Policy CG3 (low carbon energy and heating) also contributes to positive effects due to reductions in fossil fuel usage. Policy CG4 also contributes to reductions in embodied carbon.
IIA17: Waste	++	L	D	L	R	P	MT	Policy CG4 will require all major development proposals to demonstrate how waste will be minimised in the design and construction of the building, through reuse of materials on-site or ensuring new materials are sustainably sourced and low impact. The policy also encourages circular economy approaches within design and construction. Policy CG1 aims to support development proposals which minimise the use of natural resources, by promoting more efficient use of materials in the construction process in line with the principles of the circular economy, minimising waste and consumption throughout the lifecycle of a building.
IIA18: Efficient use of Land and Resources	++	L	D	R	I	P	LT	Policy CG11 (contaminated land and storage of hazardous substances) outlines the requirements to remediate contaminated land. This is likely to improve the quality of land within Tower Hamlets and contribute to the utilisation of brownfield land. Policy CG1 aims to support development proposals which minimise the use of natural resources, by promoting more efficient use of materials in the construction process in line with the principles of the circular economy, minimising waste and consumption throughout the lifecycle of a building.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are potential positive cumulative effects upon air quality, human health, housing, and climate change in conjunction with other policies. This is likely to result in improved air quality, and improvements to housing standards within the borough. There are also potential positive cumulative improvements to biodiversity, in conjunction with Biodiversity and Open Space policies. <p>Inter-plan:</p> <ul style="list-style-type: none"> Positive cumulative effects are expected from the overlapping requirements of the Clean, Green Future policies and the London Plan Policy SD1 on Opportunity Areas. Opportunity Areas are identified by the London Plan as significant locations with development capacity to accommodate housing, infrastructure and commercial development. The identification of such areas and the significant effect they have the potential to enact allows for the promotion of clean green principles in their development in order to support sustainability in the borough. This includes the development of brownfield sites in order to make the best use of land available. 							
Mitigation and Enhancement Measures	No mitigation or enhancement measures have been identified for these policies.							

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> • Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers. <p>HIA</p> <ul style="list-style-type: none"> • In general, Clean Green Future results in positive impacts upon health determinants. There are a number of resulting beneficial health effects, particularly upon older people, infants, children and young people including care leavers, people with long term health conditions and low-income groups. 							
IIA Issues addressed	<ul style="list-style-type: none"> • Increases in light, air, and noise pollution from increasing development in the borough • Frequent heat episodes as a result of climate change can contribute to the worsening of air quality • Climate change is likely to increase the occurrence of flooding from all sources • The impacts of the UHI generated in will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households • There is the need to reduce GHG emissions of new infrastructure and housing • There is a need to ensure climate resilience of the infrastructure in LBTH • Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the already stressed capacity of sewer systems 							
Recommendations	<ul style="list-style-type: none"> • Policy CG4 Part 6 could be clearer on retrofitting proposals as it is not clear what developments these actually apply to - are these only applied to those undergoing redevelopment or applied to all existing housing stock? • Policy CG6 Part 8 could be reworded to '<i>Nature based solutions such as natural drainage systems and planted landscapes...</i>' • Policy CG9 could benefit from including the promotion of public or active travel modes within the policy, rather than just stating electric vehicles or sustainable movement patterns. 							

2.4 People, Places and Spaces

The assessment of the People, Places and Spaces Policies are presented in **Table 2-4** below.

Table 2-4 – People, Places and Space Policies Assessment

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	I	P	LT	<p>Policies within People Places and Spaces contribute to significant positive effects upon IIA1. PS1 (Design and Infrastructure Led Approach to Development) results in positive effects on communities as the policy supports the borough's growing population. Additionally, the policy outlines community engagement measures to ensure development suits community needs, and gender inclusive design.</p> <p>Policy PS5 (creating inclusive places) results in positive effects through improvements to equalities, ensuring all genders are able to access community spaces equally.</p> <p>Additionally, Policy PS4 (Attractive Streets, Spaces, and Public Realm) provides a range of public spaces for community use within developments. This improves the local facilities available for growing communities in the borough.</p>
IIA2: Human Health	++	M	D/I	R	I	P	LT	<p>Policy PS2 (tall buildings) indirectly improves health through the communal open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.</p> <p>Policy PS3 (Securing Design Quality) aims to ensure that developments do not result in unacceptably harmful impacts arising from overheating, wind, air pollution, light pollution noise pollution, or odours. All of these aspects can have harmful effects on human health, therefore reducing harmful impacts will have positive effects on the health of neighbouring populations. Additionally, the policy ensures developments consider the health and wellbeing of all users, including vulnerable people, throughout the design process. This further aids in reducing harmful impacts of development.</p> <p>Policy PS5 (creating inclusive places) includes measures for well-designed open spaces, which are accessible to all genders. This is likely to benefit health through reducing isolation of genders, for example mothers, and provide space for socialisation and activity outside, improving physical and mental health.</p>
IIA3: Economy & Town Centres	+	L	D	L	R	P	MT	<p>Policy PS9 (shopfronts) outlines the need for active shopfronts which will help to improve the economic diversity within the borough and encourage multi-use shopfronts, building the local economy. This is also reinforced by a number of other policies within the grouping.</p>
IIA4: Employment & Skills	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA5: Housing	+	L	D	R	I	P	LT	<p>Policy PS3 is likely to result in improved housing, particularly through improvements to privacy for residents, creating more habitable rooms and provision of a mix and range of communal and publicly</p>

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								accessible open spaces and water spaces. Policy PS2 supports the development of tall buildings, which could present opportunities to deliver greater housing densities.
IIA6: Crime & Safety	++	M	D/I	R	R	P	MT	<p>A number of policies within this group provide improvements to safety both directly and indirectly. Generally, they support public realm and high quality design which can engender a sense of pride in a place, which in turn can help to discourage crime.</p> <p>Policy PS2 (tall buildings) considers public safety within the design of tall buildings, including through evacuation routes.</p> <p>Policy PS4 incorporates secured by design principles which will help to improve safety and perception of safety for pedestrians. Additionally, the policy encourages a healthy streets approach. As part of this the 'people feel safe' indicator will help to ensure that whole community should feel comfortable and safe at all times and people should not feel worried about road danger or experience threats to their personal safety.</p> <p>Policy PS5 also includes lighting and signage measures, as well as design to make areas safe for all genders, particularly reducing the fear of crime.</p>
IIA7: Sustainable Transport	+	L	I	L	R	P	MT	Policy PS4 encourages better connectivity and permeability around sites, encouraging people to easily and safely get around the borough. It encourages connectivity to public transport hubs, town centres, open spaces, employment and community facilities. This could help to reduce the demand for use of private vehicles and facilitate a modal shift to more sustainable modes.
IIA8: Accessibility	++	L	D	R	R	P	MT	Policy PS4 outlines the requirements for development to maintain accessible street networks and enhance connectivity through developments. This includes connectivity to public transport hubs and improving accessibility around the borough. The application of the 'healthy streets' approach will ensure that public places are accessible for all.
IIA9: Biodiversity & Natural Capital	+	L	D	L	R	P	LT	<p>Policy PS2 requires new development to provides communal open space which may enhance local natural capital. The policy also requires development to have no adverse effect on biodiversity in the local area, preserving species and habitats.</p> <p>PS4 encourages tree planting and the maximisation of planting and soft landscaping to provide visual and environmental relief from hard landscaping. This is likely to provide small scale habitat creation and ecological networks.</p>
IIA10: Landscape & Townscape	+	H	D	R	R/I	P	LT	There are a number of policies within this group that contribute to significant positive effects on IIA10. Policy PS1 requires the appropriate scale of new developments, this will protect the borough's landscape and views. Similarly, policy PS2 requires tall buildings to provide high quality development that considers landmarks, key views and historic skylines, protecting the borough's views. However, there is no specification within the policy regarding building heights. Therefore, in the short term there is the potential for development to negatively impact the borough's landscape and views depending on the location of tall

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								buildings and the sensitivity of design. In the long term, there is potential for the borough to develop its own unique skyline. Policies PS3 and PS4 support high quality design, the creation of attractive streets, spaces and public realms, as well as active frontages. This contributes to improved landscape and townscape within the borough and an improved streetscape value. Policy PS8 requires the management of key views within the borough. The policy also ensures the value of landmarks are protected. This means that new development is unlikely to negatively impact the local landscape and views. Policy PS9 also requires active shopfronts, which positively contributes to the local townscape.
I/A11: Historic Environment	++	M	D	R	R	P	LT	Policy PS6 specifically outlines the preservation and enhancement of designated and non-designated heritage assets, including archaeological areas and heritage at risk. However, the policy will under some circumstances allow the loss of heritage assets if they meet a stringent criterion. Policy PS7 (world heritage sites) also requires the safeguarding of the two world heritage sites within the borough, resulting in positive effects.
I/A12: Flooding	+	L	I	L	R	P	MT	Supporting text for Policy PS1 states that a design led approach will question whether proposals be built to meet high sustainability standards, and to maximise green spaces and effectively manage flood risk. General improvements to the public realm. Policy PS4 aims to ensure that all new streets contain trees and maximise planting and soft landscaping to provide visual and environmental relief. This could help to intercept rainfall and decrease surface run-off.
I/A13: Water Quality	+	L	I	R	R	P	MT	Policy PS3 supports efficient design, which could include water efficiency, however, this isn't necessarily clear. Supporting water efficient design can help to reduce the risk of environmental pollution, improve water quality and also saves energy. Policy PS2 requires new developments of tall buildings to have no adverse effect on water bodies, which is likely to maintain current water quality. PS4 encourages tree planting and the maximisation of planting and soft landscaping to provide visual and environmental relief from hard landscaping. This is likely to help indirectly improve water quality as trees, shrubs, ground cover and other plants can help filter out pollutants and reduce the amount of pollution that is washed into surface water bodies.
I/A14: Air Quality	+	L	I	R	R	P/T	MT	Policy PS3 (part f) states that use design and construction techniques to ensure that the development does not result in unacceptably harmful impacts arising from air pollution. Policy PS2 requires new development to provide communal open space which may enhance local natural capital. Urban greening will help to support air purification and dust suppression which could help to reduce levels of air pollution within the borough.

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	+	L	D	R	I	P	LT	Policy PS3 requires the high-quality design of new developments, including the resilience to overheating. This is likely to contribute to improving the resilience of new developments to heating as a result of climate change. Supporting text for Policy PS1 states that a design led approach will question whether proposal be built to meet high sustainability standards, and to maximise green spaces and effectively manage flood risk. General improvements to the public realm. Policy PS4 aims to ensure that all new streets contain trees and maximise planting and soft landscaping to provide visual and environmental relief. Tree planting and green infrastructure can help to reduce the urban heat island effect.
IIA16: GHG Emissions	+	L	D	L	I	P	LT	Policy PS3 supports the optimisation energy and waste efficiency, which could help to reduce GHG emissions. Part 11 of Policy PS6 aims to retrofit heritage assets to achieve greater levels of energy efficiency and reductions in carbon emissions.
IIA17: Waste	+	L	D	L	I	P	LT	Policy PS4 requires integrated refuse and recycling within new developments. This would contribute to encouraging recycling within new developments, and waste management within the borough.
IIA18: Efficient use of Land and Resources	+	M	D	R	I	P	LT	Policy PS2 supports the development of tall buildings, which can make efficient use of land by delivering greater housing densities and could reduce pressure on the borough's green spaces. Policy PS3 (part d) supports the use of high-quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are potential for cumulative effects upon IIA15, IIA10 and IIA11 when applied in combination with other policy groups such as Biodiversity and Open Space. There is potential for improved resilience to overheating, positively affecting IIA15. There are also likely to be cumulative improvements to the townscape within the borough, improving streetscape value, as a result of positive development design improving the public realm. This is likely to have positive effects in combination with the Town Centre, Biodiversity and Open Space and Community Infrastructure Policies. There are also positive cumulative effects upon IIA1 (population and equalities) through improved design and accessibility of developments, providing for the current and future population. <p>Inter-plan:</p> <ul style="list-style-type: none"> Positive cumulative effects are anticipated through the London Plan policy D9 on tall buildings and the equivalent NLP policy PS2, tall buildings. Both policies are geared towards selecting appropriate locations for the development of tall buildings, doing so in a way that avoids adverse visual impacts and fits into the spatial hierarchy of the borough. This Will work to ensure housing provision does not compromise the environment, and instead continues to protect and improve the townscape of the borough. Safety is also a key consideration in both the London Plan and the NLP. Design Out Crime initiatives working across both policies will result in positive cumulative effects for borough residents. 							
Mitigation and Enhancement Measures	No mitigation or enhancement measures have been identified.							

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> • Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users. • Securing design quality should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out. • Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered. <p>HIA</p> <ul style="list-style-type: none"> • The policies proposed within the People, Places and Spaces theme have the potential to result in positive health effects upon multiple social groups, primarily through improving housing provision within LBTH. • Improved quantity and quality of housing as well as associated access to open space will contribute positively to the physical health and wellbeing of the LBTH population. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> • Frequent heat episodes as a result of climate change can contribute to the worsening of air quality • The impacts of the UHI generated in will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households • There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH. • There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit. • There are significant health inequalities in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents. • There is a need to provide more greenspaces and high-quality public realm which can provide social spaces 							
Recommendations	<ul style="list-style-type: none"> • Policy PS5 (part G) it may be more inclusive to include all local groups and genders rather than specifically women. Policy supporting text could also include further statistics on LGBTQIA+ communities as it is currently quite focused on male and female genders. Additional reference could be made to the Tackling Violence Against Women and Girls Strategy (2021) and Inclusive Spaces and Places for Girls and Young People, An Introduction for Local Government (2023). • Policy PS1, PS3 and PS4 could incorporate elements of climate resilient design. This could include specific aspects such as rainwater and flood attenuation, SuDs, permeable paving, green roofs etc. Reference could also be made to urban creep. • PS3 touches on efficiency as part of design - this could be strengthened by inclusion (either within the policy or supporting text) on what type of efficiency measure these could include i.e. water efficient measures, energy efficient measures etc. 							

2.5 Inclusive Economy and Good Growth

The assessment of the Inclusive Economy and Good Growth Policies are presented in **Table 2-5** below.

Table 2-5 – Employment and Economic Growth Assessment

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	R	I	P	LT	<p>Policy EG1 (creating investment and jobs) includes closing the skills gap amongst the working population, improving equalities. The policy also includes affordable workspace, which provides opportunities for smaller, local businesses.</p> <p>Policy EG3 (affordable workspace) also supports those who may have smaller, local businesses, through affordable workspace. This is also likely to provide opportunities for different cultures, improving equalities. Supporting policy text also aims to support disadvantaged groups starting up in any sector</p> <p>Policy EG5 (railway arches) also improves equalities by preserving the railway arches for their current cultural uses, enabling different communities to have economic and employment space within the borough.</p>
IIA2: Human Health	+	L	I	R	I	P	LT	<p>All policies indirectly support human health. There is clear evidence that good employment improves health and wellbeing across people’s lives, not only from an economic standpoint but also in terms of quality of life.</p> <p>Policy EG1 (creating investment and jobs) results in indirect positive effects on human health. The policy closes the skills gap through improving local education levels. Improving education is likely to result in increased opportunities and positive effects on mental wellbeing.</p>
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	<p>All policies within Employment and Economic Growth contribute to increasing the economic growth within the borough.</p> <p>Policy EG1 (creating investment and jobs) provides a range of workspaces and employment locations. This also improves transport connectivity to employment opportunities. Developing new employment locations promotes growth within the borough.</p> <p>Policy EG2 (new employment space) also contributes to encouraging investment within the borough from businesses utilising the new employment space.</p> <p>Policy EG3 (affordable workspace) also encourages the investment of smaller businesses within the borough. Small business investment in Tower Hamlets encourages diversity of the economy and additional opportunities for economic growth.</p> <p>Policy EG5 (railway arches) also encourages a diverse economy within Tower Hamlets, preserving the industrial economy located in these areas, as well as food and drink, arts and culture that are located in these areas.</p> <p>Policy EG6 (data centres) provides increased provision for employment uses within Tower Hamlets.</p>

Policy Grouping		Inclusive Economy and Good Growth						
Policy Codes		EG1, EG2, EG3, EG4, EG5, EG6						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA4: Employment & Skills	++	H	D	R	I	P	LT	<p>All policies within Employment and Economic Growth contribute to increasing the number of employment opportunities within the borough. Policy EG1 (creating investment and jobs) provides improved job opportunities for all groups of the working population, including those with current low levels of education. The policy also provides jobs across the borough, providing jobs for a range of communities.</p> <p>Policy EG2 (new employment space) also creates new spaces for employment opportunities, increasing the number of jobs available within Tower Hamlets.</p> <p>Policy EG5 (railway arches) preserves railway arches within the borough. The railway arches provide employment opportunities for a range of sectors, namely industrial, food and drink, and arts and cultural employment opportunities.</p>
IIA5: Housing	-	M	I	L	I	P	LT	<p>The designation of Strategic Industrial Locations will protect the supply of space in Tower Hamlets for industrial usage. In doing so, other land uses such as housing will face competition for development within the borough. The protection and growth of Strategic Industrial Locations could, therefore, threaten the boroughs housing pipeline.</p>
IIA6: Crime & Safety	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA7: Sustainable Transport	++	M	D	R	R/I	P	LT	<p>Policy EG1 indirectly promotes sustainable transport by ensuring that the benefits of the Elizabeth line are a catalyst for growth within the borough. This is likely to encourage workers to utilise this line, and tube transportation, in order to access employment opportunities and economic opportunities within Tower Hamlets, resulting in positive effects.</p> <p>Policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 also ensures that active travel modes of walking and cycling are investigated within new developments involving railway arches. This encourages the use of sustainable transport access to areas, through improved walking and cycling facilities in these areas.</p> <p>All policies will help to reduce reliance upon the private vehicles and contribute to a modal shift.</p>

Policy Grouping		Inclusive Economy and Good Growth						
Policy Codes		EG1, EG2, EG3, EG4, EG5, EG6						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A8: Accessibility	+	M	D	R	I	P	MT	<p>Policy EG1 improves accessibility to jobs through the location of the borough's employment locations. The locations of these employment sites are located with considerations given to access to all, including through public transport.</p> <p>Policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 includes measures to ensure the accessibility to the railway arches by walking and cycling must be included within developments. This contributes to positive effects on accessibility due to walking permeability through the area, allowing those who rely on active and public transport modes, such as those on low incomes, to reach the area.</p>
I/A9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for some habitats to be lost as a result of the implementation of these policies. However, at this stage it is not clear where new development may come forward, therefore uncertain effects have been identified.
I/A10: Landscape & Townscape	+/-	L	D	L	I	P	LT	<p>Mixed positive and negative effects have been identified as there is potential for new employment developments to impact the local townscape and landscape setting.</p> <p>However, Policy EG2 requires that new employment space should contribute towards integrated place making, resulting in positive effects on the local townscape. Policy EG5 also ensures the preservation of railway arches and seeks for railway arches to make a positive contribution to the function of the area, improving the local townscape character and public realm.</p>
I/A11: Historic Environment	+/-	L	I	L	R/I	P	MT	<p>Mixed positive and negative effects have been identified as there is potential for new employment developments to impact the setting of local heritage assets if not sensitively designed.</p> <p>However, the positive placemaking proposed in policy EG2 may result in positive effects on the setting of local heritage assets. This is likely to be determined by individual schemes that may come forward. Policy EG5 also ensures the preservation of railway arches, which are a key heritage asset within the borough. This policy seeks for railway arches to make a positive contribution to the function of the area, improving the local character and public realm.</p>
I/A12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	Urban intensification and additional employment developments could increase flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.
I/A13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A14: Air Quality	+/-	M	D	R	R/I	P/T	LT	The construction of new employment developments may temporarily negatively affect air quality due to plant emissions and dust.

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>However, policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 also ensures that active travel modes of walking and cycling are investigated within new developments involving railway arches. This encourages the use of sustainable transport access to areas, through improved walking and cycling facilities in these areas.</p>
IIA15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of embodied carbon. As the number of developments and the detailed design is not currently available, uncertain effects have been identified.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. As the location of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
IIA18: Efficient use of Land and Resources	+	M	D	L	D	P	MT	Policies aim to protect existing employment floorspace and states that potential additional capacity exists within designated employment locations through the intensification of existing provision. This could help to make best use of existing land. Policy EG5 will also make good use of existing railway arches.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are opportunities for positive cumulative effects on the economy and employment from the increase in employment and economic growth across the borough. There are also potential cumulative effects upon sustainable transport due to the encouragement of a modal shift towards public and active travel modes. Potential positive cumulative effects are also anticipated for population and equalities due to improved opportunities and resources for current and future populations, including employment opportunities and improved education, meeting community needs. Positive cumulative effects are likely in combination with the Town Centre policies. <p>Inter-plan:</p> <ul style="list-style-type: none"> A high level of positive cumulative effects is expected resulting from the synergy of London Plan and NLP policies relating to Inclusive Economy and Good Growth. Both policies strive to provide suitable business spaces, including flexible and hybrid working spaces. These spaces are likely to be well suited to SME's and small independent businesses in both growing sectors and creative businesses looking to set up in the borough. Importantly, the affordability of workspaces is stressed by both the NLP and London Plan, including those targeted towards start-up and early stage businesses. Positive cumulative effect will be resultant of efforts towards ensuring a wide range of economic opportunities all to make the borough fairer, and more inclusive. Finally, both policies put forward plans to improve digital connectivity. Positive cumulative effects of enhanced broadband throughout the borough and assurance that connectivity will meet growing demands of development will be felt by all borough residents. 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Mitigation to loss in housing is likely to be solved by the application of housing policies. Mitigation measures for IIA9, IIA10, IIA11 and IIA12 are likely to be based on site specific information once development sites have come forward, but positive placemaking and inclusion of green spaces/ small habitats could help to alleviate negative effects. 							

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). Mitigation for IIA12 is likely to be offered by proposed Policy CG6 which aims to manage flood risk from all sources. 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> Jobs creation must be evenly distributed across space within the borough to ensure all groups are able to easily access employment. New employment spaces should be a diverse and equal mix of office space and spaces for small businesses to thrive. The accessibility of disabled groups must also be considered when ensuring the walkability of the area. Footpaths must not be obstructed to allow space for wheelchair users to travel through. <p>HIA</p> <ul style="list-style-type: none"> The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough's employment spaces. The policies also supports the provision of education and upskilling opportunities throughout the borough. In doing so the current skills gap amongst the working population will likely diminish and a wider range of jobs will be accessible to a greater proportion of the population. The protection and growth of Strategic Industrial Locations could, threaten the boroughs housing stock. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> LBTH is a major location for employment in London, attracting a large daytime population of employees. Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount is employed. It is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough. 							
Recommendations	<ul style="list-style-type: none"> Inclusive Economy and Good Growth policies would benefit from including additional notes to the development of town centre economies and the preservation of these areas. 							

2.6 Town Centres

The assessment of the Town Centre Policies are presented in **Table 2-6** below.

Table 2-6 – Town Centre Policies Assessment

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	R	P	LT	<p>Policy TC1 (Supporting the network and hierarchy of centres) includes community uses within town centres. This provides facilities for the community and is likely to suit community needs. It sets out plans for Whitechapel to become a civic hub for the borough through the new Town Hall and provide a concentration of health-related community services</p> <p>Policy TC2 (Protecting the diversity, vitality and viability of our town centres) also preserves retail uses within town centres, providing services and amenities for local communities.</p> <p>Policy TC7 (Evening and night time economy) also includes the development of 24 hour shops in close proximity to the borough's centres with night workers (Whitechapel and Brick Lane). This not only provides amenities for the local community but it also ensures that services are more widely available to those workers in the night-time economy who cannot access them during normal business hours.</p>
IIA2: Human Health	+	L	I	R	R	P	MT	<p>All policies help to support social cohesion across the borough, encouraging opportunities for social interaction between community members.</p> <p>Policy TC1 indirectly improves health through providing areas for socialisation, entertainment and culture. This contributes to improving mental wellbeing. There is potential for negative effects on the mental wellbeing of local residents as a result of the night time economy, and noise during night time hours. However, Policy TC7 includes mitigation requirements for night time economy venues, including mitigating noise, reducing the negative health impact upon local residents.</p> <p>Policy TC5 (Food and drink) includes the development of cafes and restaurants. These areas are likely to provide places for socialisation and meeting places, also improving mental wellbeing.</p>

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	<p>All policies within Town Centres contribute to improving the diversity of the economy within Tower Hamlets, and encouraging economic growth through a range of sectors across the borough. Policy TC1 improves the vitality and resilience of the town centres within Tower Hamlets, through promoting different uses and frontages to ensure diverse uses and promote economic growth.</p> <p>Policy TC2 supports the retail function in specialist centres. This contributes to bringing visitors back to the high street and improving the economy of town centres. Encouraging retail also preserves their uses and improves the diversity of town centres.</p> <p>Policy TC7 also improves night time economy within town centres. As the borough has a number of town centres playing a significant role in the night time economy, improvements to the night time economy are likely to have significant positive effects on the borough's overall economy.</p> <p>Policy TC8 (Short-stay accommodation) promotes visitors to Tower Hamlets and is likely to improve the visitor economy.</p> <p>Policy TC4 (Markets) preserves the markets within Tower Hamlets, also preserving cultural diversity within the borough and promoting a diverse economy.</p>
IIA4: Employment & Skills	++	M	D	R	I	P	LT	<p>Additional town centre developments could contribute to the availability of additional employment opportunities within the borough.</p> <p>Policy TC1 directly provides opportunity for employment in retail and hospitality across Tower Hamlets. It also increases employment for night-time workers as a result of the night time economy. A large proportion of town centres in Tower Hamlets provide night time economy areas, improving employment opportunities. Policy TC7 also is likely to result in an increase in employment opportunities as part of the night time economy.</p>
IIA5: Housing	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA6: Crime & Safety	+/-	M	D	R	R	P	MT	<p>Policy TC1 promotes inclusive design, too ensure vulnerable users feel safe during the day and night. The policy also improves accessibility and wayfinding within town centres, improving safety and the feeling of safety.</p> <p>Policy TC7 requires night time economy developments to mitigate against any negative impacts, including noise, odours and anti-social behaviour. This is likely to minimise crime in these areas, particularly from anti social behaviour. New developments are also encouraged to improve the safety of these activities through the 'Ask for Angela' and National Pubwatch schemes. This is also likely to improve the feeling of safety.</p>

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Indirect positive impacts on crime and safety are also likely as a result of improving the active frontages within the borough, preventing vacant areas and reducing the likelihood of crime.
I/A7: Sustainable Transport	+	M	D	R	I	P	LT	<p>All policies outlining development within town centres are likely to indirectly encourage public transportation use as these areas are well connected to existing public transportation.</p> <p>Policy TC6 (Entertainment uses) promotes the development of entertainment uses out of the town centre where there is good public transport accessibility.</p> <p>Policy TC7 also outlines that any out of town centre night time economy developments should have good public transport accessibility (within 400m of a night bus or tube stop).</p> <p>Policy TC8 requires public transport linkages to short stay accommodation to encourage visitors to use public transport.</p>
I/A8: Accessibility	+	L	D	L	R	P	MT	Whilst the Town Centres policies do not include a specific policy addressing accessibility, policy TC5 requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users.
I/A9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A10: Landscape & Townscape	+	M	D	R	I	P	LT	<p>All policies place restrictions on developments out of town centres, which will help to preserve the existing townscapes and landscapes within the borough, provided design is sensitive to the existing townscape.</p> <p>Policy TC1 promotes active primary and secondary frontages. This contributes to improving the townscape value and public realm.</p> <p>Policy TC2 preserves town centre usage and is likely to attract visitors and increase footfall, as well as improving frontages and the public realm.</p> <p>Similarly, Policy TC5 prevents the over proliferation of hot food takeaways, also improving the diversity of the townscape.</p> <p>Policy TC9 preserves markets, ensuring a diversity within landscapes and improving the public realm.</p>
I/A11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain if the development of town centres, and associated spaces, will contribute to improvements to the setting of the local historic environment. There is potential that sensitively designed developments could improve the setting of heritage assets, equally they may also erode the historic character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.
I/A12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A14: Air Quality	+	M	I	R	R	T	MT	Policy TC2 seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
I/A15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A16: GHG Emissions	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A17: Waste	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A18: Efficient use of Land	+	L	D	R	I	P	LT	<p>Policy TC2 outlines that where a vacant site is not utilised, the site is to be supported for other uses to make use of the space. This promotes the use of brownfield/ previously developed land within the borough.</p> <p>Similarly, Policy TC9 outlines that the development of new markets outside of town centres will be supported where they bring vacant sites back into use, further supporting the use of brownfield land/ previously developed land.</p>
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> • Potential for positive cumulative effects on economy and employment through revitalising and boosting town centres and night time economy. • Positive potential effects on landscape in conjunction with other policies through improvements to the public realm. • There are also potential positive effects upon crime and safety as a result of improvements to town centre areas, in conjunction with other policies such as People, Places and Spaces. • Positive cumulative effects are likely in combination with the Inclusive Economy and Good Growth policies. <p>Inter-plan:</p> <ul style="list-style-type: none"> • There are potential positive cumulative effects on population and equalities with London Plan 2021 policies (SD4, SD6, SD7, SD8), driving improvements to social infrastructure, including employment opportunities and improved education, meeting community needs. • Town centre policies in combination with London Plan 2021 policies (E9, E10) have the potential for positive cumulative effects on the economy, creating a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services. Improvements to the night time economy are likely to have significant positive effects on the borough's overall economy in combination with London Plan 2021 policies (HC5, HC6). • Sustainable transport measures are likely to be specific to each development, but there may be cumulative benefits if implemented across plans (as set out in London Plan policies) (SD4, SD6). • The preservation of the historic environment is encouraged by London Plan 2021 policies (HC5) whereby the temporary use of vacant buildings (including heritage assets) for creative workspace and activities is encouraged, resulting in positive cumulative effects. This policy supports the restoration of listed buildings; retaining their character for community uses. 							

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs. The TfL Healthy Street Principles should be applied and the Healthy Streets Tool should be utilised where appropriate as set out in Policy MC2 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres and is necessary to meet the immediate convenience needs of local people and/or support the function of designated employment locations. This policy requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users. The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis. Operation of the evening economy should be considered in tandem with safety measures to protect groups who could be more likely to be a victim of hate crimes. This includes women, LGBTIQ+ people, and people of different ethnicities. Night time venues can do this through the use of the 'Ask for Angela' and National 'Pubwatch' schemes, for just one example. This is also likely to improve the feeling of safety. Ensure accessibility standards are adhered to in short-stay accommodation. <p>HIA</p> <ul style="list-style-type: none"> The policies outlined within the Town Centres theme are likely to have mixed impacts upon the selected health determinants. These impacts are likely to be predominantly positive, with positive effects expected for young people including care leavers, older people, new and expectant mothers, women and girls, people with disabilities, low-income and unemployed groups and socially isolated groups. Policies support social cohesion across the borough, with existing routes being prioritised and new venues being developed to encourage opportunities for social interaction between community members. Services are also being made more widely available to those workers in the night-time economy who cannot access them during normal business hours through the requirements for late-opening and 24-hour services. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour. There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours. There are opportunities to increase the safety of active transport modes such as cycling and walking. Vulnerable road users such as cyclists and pedestrians are more likely to be casualties. Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping. 							
Recommendations	<ul style="list-style-type: none"> More emphasis should be placed on ensuring that night time uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as citizen type patrols, CCTV and lighting. 							

2.7 Community Infrastructure

The assessment of the Community Infrastructure Policies are presented in **Table 2-7** below.

Table 2-7 – Community Infrastructure Policies Assessment

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	M	D	R	I	P	LT	<p>All policies within Community Infrastructure contributes to providing community facilities for current and future populations.</p> <p>Policy CI1 (supporting community infrastructure) protects, maintains and enhances existing community facilities and increases the capacity of existing community facilities where other development will increase demand. This improves the provision for the local community and considers both the current and future community needs as well as delivering social value to the community through a range of services and opening hours.</p> <p>Policy CI3 (new and enhanced community facilities) also outlines the development of new community facilities, that will fit local needs and serve the changing needs of the local community.</p>
I/A2: Human Health	++	M	D/I	R	R/I	P	MT/ LT	<p>There are both direct and indirect positive effects on human health as a result of Community Infrastructure policies, through improving physical health and mental wellbeing.</p> <p>Policy CI1 outlines improvements to community facilities, including healthcare and sports and leisure facilities. This improves physical health through encouraging physical activity, as well as improving mental wellbeing through improving spaces for socialisation and encouraging activity.</p> <p>Policy CI3 will help to improve physical health through providing new community facilities and leisure facilities. This also improves mental wellbeing through new social facilities. Additionally, new early education and care facilities will also be located in areas of acceptable air quality, indirectly improving health. This is particularly of note as young people and older people are most at risk of respiratory illnesses such as asthma as a result of poor air quality.</p>

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA3: Economy & Town Centres	++	M	D	R	I	P	LT	<p>Policy CI1 states that new community facilities will be directed towards centres. This promotes the diversity of town centre services and improves visitor numbers to centres, including social facilities like libraries, cultural facilities. This also includes facilities such as public houses, boosting the economy of town centres.</p> <p>Policy CI3 also focuses the development of new and enhanced community facilities in town centres, further boosting and diversifying the economy in Tower Hamlets centres.</p> <p>Policy CI4 (public houses) preserves public houses. This boosts the local economy and provides a diverse range of uses within town centres. Preserving public houses also improves the nighttime economy within Tower Hamlets.</p> <p>Policy CI5 (arts and culture facilities) also outlines that new arts and cultural facilities will be focussed in town centre locations, providing diversity to town centre economies and boosting the nighttime economy.</p>
IIA4: Employment & Skills	++	M	D	R	I	P	LT	<p>The policies within Community Infrastructure contribute to improving education amongst the population of Tower Hamlets.</p> <p>Policy CI1 includes preservation of the existing provision of education facilities, and the development of new facilities in line with community needs. The policy also outlines improving the accessibility of education facilities. This is likely to result in increased educational levels across the borough.</p> <p>Policy CI3 also includes the provision for new early education facilities where required, providing early years educational spaces for young children. Additional adult and higher education facilities are also proposed, improving educational levels across both children and adults within the borough.</p>
IIA5: Housing	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA6: Crime & Safety	+	L	D	R	I	P	LT	<p>Policy CI3 aims to ensure that new community facilities are designed to facilitate and encourage wider community use and do not look and feel exclusive to the occupants of the development. It aims to ensure safety by giving consideration of the use of street facing active frontages and presenting openness to the wider community whilst enhancing a feeling of safety on the streetscape through passive surveillance.</p>
IIA7: Sustainable Transport	+	M	D	R	I	P	LT	<p>All policies aim to improve accessibility to community facilities, which will allow residents to live their lives more locally. This in turn will reduce the reliance upon motorised vehicles and support a modal shift.</p> <p>Policy CI3 aims to ensure that new facilities will be directed towards locations which are accessible to their catchment areas through strong public transport links and by prioritising active travel. This will help to reduce the demand for use of private vehicles and help to support a modal shift.</p>

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	++	M	D	R	R	P	LT	<p>Policy CI2 includes the development of accessible, inclusive new facilities. This includes allowing public access. This is likely to improve access to facilities to all groups of the public, including disabled and low income users.</p> <p>Policy CI3 states that new facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility.</p>
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for community infrastructure developments to result in the loss of biodiversity and natural capital. As the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain if the development of community infrastructure, will contribute to improvements to the setting of the local townscape and landscape character. There is potential that sensitively designed developments could improve townscape, equally they could erode the townscape and landscape character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>It is currently uncertain if the development of community infrastructure, will contribute to improvements to the setting of the local historic environment. There is potential that sensitively designed developments could improve the setting of heritage assets, equally they could erode the historic character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.</p> <p>Policy CI4 (public houses) promotes the preservation of the character of public houses, where development is permitted. Preserving the nature of these assets also has the potential to preserve designated and undesignated heritage assets. However, this is to be determined by individual developments that may arise.</p>
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+	M	I	R	R	T	MT	Policy CI3 seeks to ensure that development proposals for new community facilities take into account air quality levels as part of the relevant guidance from the Department for Education and Sport England. Additionally, the location of early education and care facilities must meet the needs of young children and promote their development, involving their locating away from areas of poor air quality.
IIA15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of embodied carbon. As the number of developments and the detailed design is not currently available, uncertain effects have been identified.

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. As the location of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
IIA18: Efficient use of Land	+	L	I	L	R	P/T	MT/ LT	Policy CI3 permits the utilisation of vacant land sites for community uses, which promotes the use of existing sites within the borough.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are potential positive cumulative effects on the economy as a result of developments within town centres, diversifying the economy. There are also positive cumulative effects upon health (both physical and mental wellbeing) through the increased provision of community spaces, in conjunction with improved physical activity and places for mental wellbeing. The development of additional community facilities, fitting future community needs, also has positive cumulative effects in conjunction with People Places and Spaces and Homes for the Community policies. There is potential for negative cumulative and synergistic effects on biodiversity, landscape and townscape, historic environment, air quality, GHGs, flooding and efficient use land if multiple developments were to come forward. These may conflict with policies PS6, PS7, PS8, BO1, BO2, CG1 and CG9. There is potential for negative cumulative effects upon water quality, air quality and GHG emissions due to increased works and potential land take within the borough, however this is dependent on individual development sites that may come forward. Multiple developments are also likely to be resource intensive and significantly increase levels of embodied carbon as well as emissions associated with construction. <p>Inter-plan:</p> <ul style="list-style-type: none"> There are potential positive cumulative effects resulting from the provision of social infrastructure including new community facilities and services if implemented across plans (as set out in London Plan policies) (S1, S2, S3, S4, S5). There are potential for minor negative cumulative effects of high concentrations of licensed premises on crime and safety, anti-social behaviour, noise pollution, health and wellbeing and other issues for residents and nearby uses in combination with London Plan 2021 policies (HC5, HC6). However, Design Out Crime initiatives working across both policies will result in positive cumulative effects for borough residents. The Agent of Change principle is also a key consideration in both the London Plan and the NLP. Sustainable transport measures are likely to be specific to each development, but there may be cumulative benefits if implemented across plans. London Plan policies (HC6) promote boroughs to ensure night-time economy venues are well-served with safe and convenient night-time transport, in line with 24-hour goals. This could have associated benefits for businesses: expanding into night-time economic opportunities. The preservation of the historic environment is encouraged by London Plan 2021 policies (HC5) whereby the temporary use of vacant buildings (including heritage assets) for creative workspace and activities is encouraged, resulting in positive cumulative effects. This policy supports the restoration of listed buildings; retaining their character for community uses. There is potential for positive cumulative effects upon efficient use of land in combination with London Plan 2021 policies (S17), with developments encouraged to make effective use of the site to maximise the opportunities for multi-purpose and shared use facilities. 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible. Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). Application of Policy BO1 will likely help to reduce effects on biodiversity and open spaces. 							

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply and future planned supply is sufficient in supporting the new community. 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities. New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility. <p>HIA</p> <ul style="list-style-type: none"> These policies will have predominantly positive effects upon the community of LBTH. These policies are anticipated to benefit children and young people, older people, people with disabilities, people with long term health conditions, and socially excluded groups. The improvement of social infrastructure such as parks and sports centres will also increase social cohesion and safety within the borough. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income. There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities. The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile. LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness There is a need to provide more greenspaces and high-quality public realm which can provide social spaces 							
Recommendations	<ul style="list-style-type: none"> Within Policy CI2, the explanation of Part 2 could benefit from including further explanation as to how inclusive design can improve access to disabled users and those with mobility issues. Policy CI2, Part 2 could also benefit from including the promotion of schemes to provide access to low-income groups. 							

2.8 Biodiversity and Open Space

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-8** below.

Table 2-8 – Biodiversity and Open Space Policies Assessment

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	R	P	LT	<p>Policy BO1 (green and blue infrastructure) outlines improvements to the quality of open spaces within the borough, with areas of deficiency to open space being prioritised, therefore improving community facilities. The policy also includes the promotion of using water spaces for cultural and recreational use, providing spaces for the community.</p> <p>Policy BO2 (open spaces and the Green Grid network) provides community facilities within developments to open space, including playgrounds and outdoor gyms. These spaces will be accessible and will ensure high quality inclusive design.</p> <p>Policy BO3 (water spaces) also contributes to improving the local amenity space of riverbanks and dock edges, providing increases in publicly available spaces.</p> <p>Policy BO6 (play and recreation spaces) provides opportunities for sports, recreation and play areas that meet the needs of the population, including providing spaces for children and young people, disabled users, adults and carers. The policy also includes improving provision of play space in areas which have high deficiency to play space, ensuring improved access for all groups.</p> <p>Policy BO7 (food growing) provides spaces for community gardens, and includes the development of community facilities in major housing developments. This provides community spaces for food growing as well as social interaction.</p>
IIA2: Human Health	++	M	D	R	R	P	MT/LT	<p>Policy BO1 maintains and enhances green infrastructure and accessible open spaces. This contributes to improving both mental wellbeing and physical health through providing spaces for social interaction and physical activity. Additionally, this promotes recreation and leisure on blue spaces, improving health.</p> <p>Policy BO2 provides opportunities for physical activity and improvements in wellbeing through providing opportunities for outdoor sport, fitness and recreation. Point 2 (i) also includes the integration of food growing opportunities where feasible. This provides opportunities for healthy foods and promotes healthy lifestyles.</p> <p>Policy BO6 is likely to result in increased physical activity amongst children and young people, and adults, through improving the provision of sports and recreation facilities. This also includes designing spaces to reduce the harm caused by poor air quality. This is likely to reduce the exacerbation of respiratory illnesses amongst children.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy BO7 also improves physical and mental health through the increase in the provision of food growing spaces, and preservation of allotments and community gardens. These provide spaces for social interaction, as well as opportunities for healthy food.
IIA3: Economy & Town Centres	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA4: Employment & Skills	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA5: Housing	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA6: Crime & Safety	+	L	D	L	I	P	LT	<p>Policy BO1 includes the requirement for new green spaces designed to be safe to users. However, it is uncertain what measures will be included to improve safety within open spaces as this is likely to be determined by scheme design.</p> <p>Policy BO3 (specifically point 2 f) improves the safety of the borough's water spaces, including the provision of lifesaving equipment, improved lighting and wayfinding, and managing competing spaces between users. This is likely to improve user safety, and reduce the number of incidents along the borough's water environments.</p> <p>Policy BO6 includes safe design to ensure the safety of users, including children.</p>
IIA7: Sustainable Transport	+	L	D	R	I	P	LT	<p>PO2 outlines developments to the green grid, this contributes to improving the appeal of walking networks, and encouraging active travel.</p> <p>PO3 point 3 also includes the requirement for developments to integrate with the waterside environment, including walkways, cycle paths and towpaths. The integration of these areas is likely to result in improved connectivity of the active travel network, encouraging active travel and promoting sustainable transport modes.</p>
IIA8: Accessibility	+	M	D	R	I	P	LT	<p>Policy BO1 maintains and enhances 'accessible open spaces' throughout the borough, including at Lea River Park as well as improving way-finding to water spaces. This provides spaces for the general public, including all social groups.</p> <p>Policy BO2 also contributes to the delivery of new or enhanced publicly available open space. These spaces are to be designed to be enjoyed by people of all ages and physical abilities.</p> <p>PO6 includes designing spaces for all abilities and ages, addressing barriers to play through inclusion and equality. However, the specific measures proposed will be determined by individual scheme design.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	++	H	D	R	R	T	LT	<p>All policies within Biodiversity and Open space contribute to improving biodiversity and natural capital across the borough, including improving and enhancing blue and green spaces, green infrastructure, and contributing towards biodiversity net gain (BNG).</p> <p>Policy BO1 requires developments to improve green infrastructure and open space in line with local biodiversity action plans, and improves the green grid network, providing ecological corridors. The policy also enhances blue spaces and improves the ecological and biodiversity values of the borough's water spaces, including rehabilitating and rewilding. Additionally, it outlines requirements for all development proposals to achieve minimum urban greening factor and BNG targets.</p> <p>Policy BO2 enhances biodiversity through improvements to open spaces and the green grid network, this also includes preserving the ecological value of open spaces.</p> <p>Policy BO3 requires developments to enhance the biodiversity of the water space within the borough, as well as rewilding and re-naturalisation, further resulting in improvements to local biodiversity and ecology in the water areas of Tower Hamlets.</p> <p>Policy BO4 protects and retains existing habitats and biodiversity. It also outlines the replacement where preservation is not possible. Additionally, the policy requires developments to deliver a BNG of 30%. There is also a requirement for development proposals to preserve designated European sites, and undertake a Habitat Regulations Assessment where adverse effects are likely. The policy as a whole therefore directly results in preservation and enhancement of biodiversity and natural capital within the borough. Additionally, it contributes to eradicating invasive species where possible.</p> <p>Policy BO5 contributes to developing areas for habitats and biodiversity within the borough, including increasing the provision of trees. Trees provide habitats for a range of species, and increase canopy connectivity, reducing habitat segregation.</p>
IIA10: Landscape & Townscape	++	M	D	R	I	P	LT	<p>Policy BO1 maintains the character of MOL, contributing to preservation of the landscape character. Additionally, preserving green and blue spaces enhances the landscape of Tower Hamlets, proving a range of high quality open spaces. Improving the water environment (point 3) is also likely to improve the appearance of these landscapes, further contributing to positive landscape character.</p> <p>Policy BO2 also provides new or enhanced open space, that is of high quality design and complements local character. These developments are likely to improve the public realm through improvements to open spaces and landscaping.</p> <p>Policy BO3 also contributes to conserving and improving the landscape of Tower Hamlets through enhancements to the setting of water spaces, as well as improving the river banks.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A11: Historic Environment	+	L	D	L	R	P	MT	<p>Policy BO2 requires developments to not have adverse impacts on the heritage value of the borough's open spaces. This policy is also likely to preserve the setting of the borough's open spaces and local heritage assets in these areas.</p> <p>Policy BO3 also contributes to the preservation of the heritage value of water spaces, preserving the historic environment of Tower Hamlets.</p>
I/A12: Flooding	++	L	I	L	I	P	MT/LT	<p>Policy BO2 (specifically 2e) includes the incorporation of soft landscaping and sustainable urban drainage systems (SuDS). This contributes to improving flood resilience within new open space.</p> <p>Policy BO3 has considered flood risk within developments, requiring developments to provide suitable setbacks from water space edges. This contributes to mitigating flood risk and prevents the severance of walkways, cycle paths and canal towpaths during flood events.</p>
I/A13: Water Quality	++	M	D	R	R	P	LT	<p>Policy BO1 seeks to protect the integrity, improve the ecological and biodiversity, and water quality of water spaces within Tower Hamlets. This results in direct positive effects upon water quality.</p> <p>Policy BO3 protects the water environment and ensures that development must not adversely effect the water quality within the borough. Additionally, enhancing the quality of the water space through ecological, biodiversity and aesthetic methods is likely to result in improvements to water quality.</p>
I/A14: Air Quality	+	M	I	R	R	T	MT	<p>Policy BO4 states that development proposals must enhance biodiversity and contribute to nature recovery within the borough. Urban greening and the provision of living building elements is considered especially beneficial in areas of sub-standard air quality throughout the borough.</p>
I/A15: Climate Change & Resilience	++	M	I	R	R	T	LT	<p>Policy BO5 provides opportunities for climate resilience, from measures such as green roofs and walls, SuDS, and trees. These measures can increase drainage and reduce surface runoff, as well as providing shade reducing the risk of overheating.</p>
I/A16: GHG Emissions	+	M	I	R	R	T	LT	<p>Policies BO1, BO4 and BO5 all aim to protect and enhance biodiversity and blue green infrastructure within the borough. The application of green infrastructure presents an opportunity to reduce GHG emissions using a multi-faceted ecosystems-based approach</p>
I/A17: Waste	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A18: Efficient use of Land	+/-	M	D	R	R/I	P/T	MT/LT	<p>Policy BO1 restricts 'inappropriate' development proposals on MOL. This preserves MOL and encourages efficient use of existing brownfield land in the borough. However, Policy BO2 does support development on MOL in specific circumstances. This has the potential to result in the loss of MOL, depending on the nature of schemes that come forward.</p> <p>Policy BO7 provides opportunities for the use of vacant sites as new allotments for food growing spaces. This contributes to making efficient use of land through the utilisation of existing vacant sites.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p><i>Intra-project:</i> There are potential positive cumulative effects anticipated for population and equalities, health and wellbeing, biodiversity, landscape, water quality, and efficient use of land as a result of the proposed policies. There is likely to be an increase in biodiversity across the borough, and improved community open spaces, as well as improvements to physical and mental health.</p> <p><i>Inter-project:</i></p> <ul style="list-style-type: none"> Positive cumulative effects on Population and Equalities are identified as a result of NLP policies (BO7) and London Plan policies (G8). These policies provide provision for community gardens and food production, improving social integration and community cohesion. This may also lead to positive cumulative effects on Human Health, promoting more active lifestyles and better diets. Urban greening is encouraged by London Plan policies (G5) and complements NLP policies (BO1) that require all development proposals to achieve minimum urban greening factor (UGF) resulting in an increase in green cover throughout the borough. NLP policies (BO1, BO4) require developments to provide a minimum 2.5 biodiversity unit (BU) per hectare increase or deliver biodiversity net gain (BNG) of 30%, exceeding minimum BNG requirements of 10% and managing impacts on biodiversity as outlined in London Plan policies (G6) generating positive cumulative effects. Positive cumulative effects are anticipated through the London Plan policies (G3) and NLP Biodiversity and Open Space policies (BO1), protecting Metropolitan Open Land (MOL) from inappropriate development. The London Plan also supports the extension of MOL where appropriate. NLP policies (BO2) also work harmoniously with London Plan policies (G4) to create areas of publicly accessible open space that complements local character. These developments are likely to improve the public realm. Enhancements to Water Quality are encouraged through NLP policies (BO3) and London Plan policies (SI17), with positive cumulative effects identified. London Plan policies require developments that facilitate river restoration to be supported, concurrently providing habitats and protecting biodiversity. 							
Mitigation and Enhancement Measures	No mitigation measures have been outlined for these policies. Mitigations are likely to be based on site specific information once development sites have come forward.							
HIA and EqIA considerations	<p><u>EqIA</u></p> <ul style="list-style-type: none"> New parks and open spaces should be accessible to all members of the public. Design should consider safety by including appropriate lighting, accessible pathways and access and egress points. Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility. Accessible surfacing should be considered for mobility aid users and people with mobility restrictions. Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces. Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities. Accessible surfacing should be considered for mobility aid users and people with mobility restrictions. Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health. <p><u>HIA</u></p> <ul style="list-style-type: none"> These policies are anticipated to impacts on most health determinants, including positive effects for children and young people, older people, people with disabilities and mobility impairments, and socially isolated groups including new and expectant mothers. Improved access to these spaces under this theme will enhance the benefit experienced through socialisation and physical activity opportunities. Opportunities for education arise from the inclusion of the food growing policy, with young children particularly benefitting from this. 							

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> • There is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation. • Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas • New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity. • The inclusion of BGI can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island effects and help to make developments more climate resilient, especially when it comes to flood mitigation. • Future growth could risk compromising landscape and townscape character and features. • The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat. 							
Recommendations	<ul style="list-style-type: none"> • Policy BO1 (b) could be changed to "maintain and enhance" the open character of Metropolitan Open Land (MOL) • Policy BO1 (d) (ii) could be amended to include safety measures, such as lighting and clear lines of sight. • Policy BO6 (2) (b) could include ways to tackle barriers to inclusion and equality. • Policy BO4 should make reference to the requirements of BNG under the Environment Act 2021 and Defra's Biodiversity Metric. Part 2 of the policy is quite complicated and some of the text could be moved to the supporting text. 							

2.9 Movement and Connectivity

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-9** below.

Table 2-9 – Movement and Connectivity Policies Assessment

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D/I	R	R	P	LT	Developing active and sustainable travel networks, as outlined within Policies MC1 (sustainable travel) and MC2 (active travel and healthy streets) contribute to providing services to fit the needs of the current and future population of Tower Hamlets. Additionally, both MC1 and MC2 provide improved accessibility to all social groups, including disabled, elderly, women and girls and other marginalised groups.
IIA2: Human Health	++	M	D	R	I	P	LT	<p>Policy MC1 encourages active travel. This directly results in improvements to human health through improved physical activity rates. Additionally, the policy outlines that active travel developments should utilise the Healthy Streets approach, improving health and wellbeing through the design of developments.</p> <p>Policy MC2 (active travel and healthy streets) also contributes to improving the quality and connectivity of the active travel network. This is likely to improve physical health, as well as implementing the Healthy Streets approach. Additionally, encouraging a modal shift away from private vehicles, as is promoted by all policies within Movement and Connectivity, improves air quality. Air quality improvements also contribute to improving physical health, particularly amongst children and young people, the elderly, and those with respiratory illnesses.</p> <p>Policy MC3 also improves health through the promotion of active travel, improving physical activity. The policy also ensures a reduction in environmental impacts such as improving air quality, improving health and reducing exacerbation of health conditions as a result of poor air quality.</p>
IIA3: Economy & Town Centres	+	M	I	L	I	P	LT	<p>Policy MC1 aims to prioritise the needs of all pedestrians and cyclists, enabling people to choose active travel modes as the primary mode of travel for short trips within the borough, in line with 15-minute city principles. Whilst Policy MC2 states that development proposals must be designed to maximise the contribution of the public realm to encourage and enable active travel modes. It also encourages the use of the Healthy Streets principles to ensure that the development is inclusive and accessible to all groups.</p> <p>Improvements to the public realm and ensuring greater accessibility to all groups, will help to encourage more walking and cycling and increase footfall and potential improve the vitality within the town and district centres.</p>
IIA4: Employment & Skills	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA5: Housing	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA6: Crime & Safety	++	M	D	R	I	P	LT	Policy MC2 outlines the requirements for new developments to provide 2m wide footways and segregated routes for pedestrians and cyclists where possible. This is likely to result in improvements to user safety due to enabling safe overtaking and reducing user conflicts. Point 3 (e) also includes considering the design and safety of women, girls and gender diverse people. This is likely to improve feelings of safety amongst the

Policy Grouping		Movement and Connectivity						
Policy Codes		MC1, MC2, MC3, MC4, MC5						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								population. There are also measures to ensure good sight lines and surveillance, further reducing the likelihood of crime. Policy MC4 (parking and permit-free) outlines requirements for secure cycle parking. This is likely to reduce bicycle theft in the borough.
IIA7: Sustainable Transport	?	M	D	R	I	P	LT	Policy MC1 promotes the development of the sustainable travel network, including active travel. This encourages a modal shift away from private transport and towards sustainable transport modes. Additionally, Policy MC2 (active travel and healthy streets) promotes the expansion of walking and cycle network, improving active travel and further encouraging the modal shift from private vehicles. Policy MC4 outlines plans for parking management throughout the borough in order to address issues of congestion as well as respond to the needs of the community. A car free approach will be considered in areas of Tower Hamlets where the PTAL is high (4 or above). However, in those areas where PTAL scores are low, parking will be delivered in line with the London Plan maximum parking targets. This could result in an increased reliance upon private vehicles in those areas in the north and south of the borough, where scores range between 1-3. This will work against the achievement of this IIA objective.
IIA8: Accessibility	++	M	D	R	I	P	LT	Policy MC1 contributes to improving public transport, including enabling walking, wheeling and cycling. This is likely to improve access to all users, including those with mobility issues. Improving public and active transport also allows those on low incomes to access areas of the borough. The policy aims to reduce severance and increase permeability across the borough. Policy MC2 outlines the requirement for new active travel routes will be required to have footways 2m wide or using the Transport for London Pedestrian comfort level tool, whichever is greater. This is likely to improve access to disabled users and users with pushchairs, improving accessibility. Point 3 (e) also includes inclusive design for elderly, disabled and all genders. This also improves connectivity throughout the borough through the development of cycle lanes, including for adapted bicycles, contributing to improved accessibility for all groups. Policy MC4 aims to meet the needs of those community members who rely on private vehicle usage in areas of poor public transport accessibility are also accounted for through the provision of maximum parking in these areas.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in the loss of biodiversity and natural capital. It is anticipated that as the majority of the proposals will be delivered within the existing highway boundary, that loss will be small scale. However, delivery of public realm improvements (as per Policy MC2) may include additional planting and green infrastructure which could provide small scale habitats. As the overall design of proposals is not yet known uncertain effects have been identified.

Policy Grouping		Movement and Connectivity						
Policy Codes		MC1, MC2, MC3, MC4, MC5						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A10: Landscape & Townscape	+/-	M	D	R	I	P	LT	<p>All policies support a modal shift and reduction of vehicles on the borough's roads. A reduction in vehicles is likely to result in a reduction of vehicular disturbance, such as noise and air pollution, and subsequently improve the landscape and townscape through reduced numbers of vehicles on roads.</p> <p>Policy MC2 includes development engagement with the Healthy Streets Approach. Utilising this approach, in addition to improving active travel networks is likely to result in positive effects on the local landscape, including improving the public realm, particularly through positive design and the requirements of healthy streets such as 'everyone feels welcome' and 'things to see and do'.</p> <p>Policy MC4 includes the development of electric charging on streets. The integration of electric charging on streets is likely to result in positive effects on the landscape through positive design.</p> <p>There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in negative effects on the landscape and townscape setting. It is however anticipated that that as the majority of the proposals will be delivered within the existing highway boundary.</p>
I/A11: Historic Environment	+/-	M	D	R	I	P	LT	<p>All policies support a modal shift and reduction of vehicles on the borough's roads. A reduction in vehicles is likely to result in reductions in pollution and disturbance, reducing the degradation of heritage assets and improving their overall setting.</p> <p>Policy MC2 includes the application of a Healthy Streets Approach, which is likely to result in positive effects on the public realm. This may help to improve the setting of heritage assets, however, public realm improvements will need to be sensitive to the historic environment.</p> <p>There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in negative effects on the historic environment setting. It is however anticipated that that as the majority of the proposals will be delivered within the existing highway boundary.</p>
I/A12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	Policy MC5 (sustainable delivery, servicing, and construction) has resulted in uncertain effects on water quality as a result of water freight. Increasing freight on water has the potential to reduce water quality. However, this is likely to be determined by the quantity of freight activity and the nature of freight being transported.
I/A14: Air Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	All policies encouraging active travel and contribute to a modal shift away from private car use and reduction in emissions are likely to contribute to improving air quality across the borough. Additionally, restricting car parking and encouraging car free developments as a starting point for all development proposals, will help to reduce reliance upon motorised vehicles. However, in those areas where PTAL scores are low, parking will be delivered in line with the London Plan maximum parking targets. This could result in an increased reliance upon private vehicles in those areas, and have subsequent effects on air quality.

Policy Grouping		Movement and Connectivity						
Policy Codes		MC1, MC2, MC3, MC4, MC5						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>There is also potential for the construction of new and upgraded active travel routes to result in increased to temporarily reduce air quality (from dust and plant emissions) during construction.</p> <p>Policy MC3 (impacts on the transport network) also acknowledges the improvements to air quality through new developments. Additionally, utilising the Healthy Streets Approach considers improving air quality through 'clean air', further contributing to indirect improvements on air quality.</p>
I/A15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A16: GHG Emissions	+/-	M	D	R	R	P	MT	<p>All policies within Movement and Connectivity contribute to encouraging modal shift away from private car use, therefore reducing GHG emissions from vehicles. However, there is potential for the construction of new and upgraded active travel routes to result in increased GHG emissions during construction and they are likely to have high levels of embodied carbon.</p> <p>Policy MC4 includes the provision of electric vehicle charging in new developments. This encourages sustainable vehicles and is likely to reduce GHGs from private vehicles.</p> <p>Policy MC5 also contributes to reducing GHGs. However, the development of new freight areas has the potential to increase emissions. Additionally, despite the policy stating that zero and low emissions freight vehicles should be used where possible, there is potential for the use of traditional freight vehicles and increases in freight activity within Tower Hamlets. This has potential to result in increased GHG emissions depending on the nature of freight vehicles used and increases in activity.</p>
I/A17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. If a preference for road network reallocation is sought there is potential for positive effects. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
I/A18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The location of some proposals that may come forward as a result of these policies is not yet known. Whilst it is likely that the majority may result in the reallocation of the existing highway network, there could be potential for some land take. If a preference for road network reallocation is sought there is potential for positive effects.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> • There are potential positive cumulative effects on sustainable transport and accessibility across the borough, as well as air quality improvements. This is likely to result in a modal shift away from private transport and towards public transport and active travel. • There are also potential positive effects on health through increased activity rates amongst residents. • There is a potential for a cumulative increase in car usage if parking provision is maximised. Making use of private vehicles more convenient could have adverse effects on air quality and GHGs in these locations. This works against Policy MC4. 							

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>Inter-plan:</p> <ul style="list-style-type: none"> There are likely to be positive cumulative effects on both Population and Equalities and Human Health with NLP policies (MC1, MC2) working in combination with London Plan policies (GG3, T2). Policies improve accessibility to cycling to all social groups, with development proposals encouraged to demonstrate how cycle parking areas will provide facilities for disabled cyclists. The Healthy Streets Approach prioritises health in all planning decisions at t The inclusion of the 'last-mile' principle aligns with policies stated in the London Plan. This is likely to generate positive cumulative effects as the beneficial environmental effects of this process will be more widespread. NLP policies (MC4) require the consideration of potential for residential car parking in areas with low PTALs (1-3) in accordance with the maximum parking standards set out within London Plan policies (T6). These policies will provide cumulative improvements to the provision of residential parking in less accessible areas, reducing barriers of isolation. Conversely, this is likely to result in cumulative negative effects on air quality, human health and GHGs. This also contradicts the borough's Transport Strategy, where Outcome 2 aims to reduce demand for on street car parking and the amount of car trips in the borough NLP policy MC1's intention to improve accessibility of water transport is also concordant with themes of water transport in the London Plan, although no detail is given as to how improved accessibility will be achieved in relation to this mode. As such, no cumulative effects are anticipated to occur. 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Where possible, the reallocation of the existing road network should be preferred for the development of new schemes, to avoid loss of greenspaces and habitats and support the efficient use of land. Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible. Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles. Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles. It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users. It is recommended that the Purple Badge Scheme is maintained to ensure there will be no negative impacts on protected groups, such as disabled people. Management should protect priority bays to maintain accessibility for protected groups. <p>HIA</p> <ul style="list-style-type: none"> These policies are anticipated to impacts on most health determinants, including positive effects for low-income groups and socially isolated groups including new and expectant mothers in particular. The theme is particularly supportive of improvements to settings for social cohesion throughout the borough. While climate change resilience is not directly built into the policies proposed under this theme, the reduced reliance on private vehicles brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> There is a need to improve sustainable transport modes (public and active) in line with LBTH's commitment to reach net-zero GHG emissions by 2045. Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs. Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender. 							

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation. Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases. Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality. 							
Recommendations	<ul style="list-style-type: none"> Policy MC2 could benefit from including mention of how sustainable transport can improve access to those on low-incomes. Policy MC5 could be made more stringent by replacing 'should' with 'will'. 							

2.10 Reuse, Recycling and Waste

The assessment of the Reuse, Recycling and Waste Policies are presented in **Table 2-10** below.

Table 2-10 – Reuse, Recycling and Waste Policies Assessment

Policy Grouping	Reuse, Recycling and Waste							
Policy Codes	RW1, RW2, RW3							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A2: Human Health	+	N/A	N/A	N/A	N/A	N/A	N/A	Policy RW2 (new and enhanced waste facilities) states that waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power. This may help increase the quality of new and existing housing stock and provide a more cost-effective heating solutions. Cost savings may help to reduce health inequalities and reduce the pressure of the rising cost of living.
I/A3: Economy & Town Centres	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A4: Employment & Skills	+	L	I	L	I	P	LT	The increase in waste facilities may result in employment opportunities for residents within the borough.
I/A5: Housing	+	L	I	L	I	P	LT	Policy RW2 (new and enhanced waste facilities) states that waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power. Whilst this policy does not support the development of new housing, it may help increase the quality of new and existing housing stock and provide a more cost-effective heating solutions.
I/A6: Crime & Safety	+	L	D	L	R	P	LT	Policy RW2 requires new waste facilities to provide on-site measures to ensure safety and security. This is likely to result in a reduction in accidents, and improvement of safety on waste sites.
I/A7: Sustainable Transport	+	L	D	R	R	P	MT	Policy RW2 requires new waste developments, or the development of existing waste sites, to prioritise rail and water transport, as well as utilising zero/ultra-low emission vehicles. This is likely to result in minor positive effects upon sustainable transport through reducing the reliance on HGVs.
I/A8: Accessibility	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for developments to result in the loss of biodiversity and natural capital. As the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
I/A10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	Policies could result in the development of new waste facilities and infrastructure which could negatively affect the landscape and townscape. Policy RW2 does, however, require high quality design for new waste facilities. This is to ensure the integration into local landscape settings. At this stage it is not clear on the design or location of new waste facilities and therefore uncertain effects have been identified.
I/A11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	Policies could result in the development of new waste facilities and infrastructure which could negatively affect the historic environment. Policy RW2 does, however, require high quality design for new waste facilities which could ensure the integration into local historic environment. At this stage it is not clear on the design or location of new waste facilities and therefore uncertain effects have been identified.

Policy Grouping	Reuse, Recycling and Waste							
Policy Codes	RW1, RW2, RW3							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	RW2 states that waste transport will prioritise rail and water transport over the road network. There is potential that increase waterborne transport could result in an increase in water pollution and decrease in overall water quality. At this stage the potential increase in water transport is not known, so uncertain effects have been identified.
IIA14: Air Quality	+/-	L	D	R	R	P	LT	Policy RW2 requires new waste sites to minimise air pollutants, noise, vibration, dust and odours and aims to it incorporate measures to minimise carbon emissions and maximise the use of lower-carbon energy sources. Additionally, the utilisation of zero/ultra-low emission vehicles reduces the negative impacts of new sites upon air quality. However, there is potential for negative effects from waste sites operations as their operation may increase levels of air pollutants.
IIA15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA16: GHG Emissions	+/-	L	D	R	R	P	LT	Policy RW2 results in positive effects on GHGs due to utilisation of zero/ultra-low emission vehicles and the shift towards prioritising rail and water transport over the road network. New waste sites should also minimise carbon emissions and maximise low carbon energy sources. However, there is potential for negative effects from waste sites operations as their operation may increase levels of GHGs and their construction may include significant levels of embodied carbon.
IIA17: Waste	++	M	D	R	I	P	LT	All policies within the Reuse, Recycling and Waste group result in improvements to waste management within the borough. Policy RW1 (managing our waste) preserves waste facilities within the area and maximises the capacity and efficiency of waste facilities. New development will also be expected to reuse and recycle resources, minimising waste. This policy contributes to meeting future waste management needs within the borough. Policy RW3 (waste collection facilities in new development) improves the facilities for recycling, organics, residual and bulky waste. The policy also improves the collection systems on site to encourage recycling through engagement and facilities. This is likely to reduce the amount of waste within the borough.
IIA18: Efficient use of Land	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There is potential for negative cumulative effects upon water quality, air quality and GHG emissions due to increased works and potential land take within the borough, however this is dependent on individual development sites that may come forward. <p>Inter-plan:</p> <ul style="list-style-type: none"> Policy D6 in the London Plan states requirements for housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste. Equivalent policies stated under the Reuse, Recycling and Waste policy theme of the NLP will ensure positive cumulative effects will result. 							

Policy Grouping	Reuse, Recycling and Waste							
Policy Codes	RW1, RW2, RW3							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> There is the potential for positive cumulative effects on Climate Change & Resilience through the implementation of NLP policies (RW2) and London Plan policies (SI7, SI8, SI9). Development proposals that demonstrate effective implementation of the waste hierarchy and its contribution to the circular economy will be supported: improving resource efficiency, preventing waste, and reducing carbon emissions. 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Sensitive design, as outlined in the Tower Hamlets Reuse, Recycling and Waste Supplementary Planning Document¹ should be considered for any new developments to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). Application of Policy BO1 will likely help to reduce effects on biodiversity and open spaces. 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management. New waste facilities to be constructed and utilise existing brownfield sites to reduce negative biodiversity and landscape impacts associated with new development. <p>HIA</p> <ul style="list-style-type: none"> Reuse, Recycling and Waste policies will have some positive effects on the health determinants identified across a selection of social groups within the borough. Primarily, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> The growing population and associated need for development is likely to increase the use of mineral resources and waste generation. Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population. 							
Recommendations	<ul style="list-style-type: none"> Policies could benefit from emphasising the requirement to reduce waste within the borough and improve recycling rates borough wide. Policy RW2 could also benefit from acknowledging and implementing circular economy principles within the development of new waste sites. 							

¹ Tower Hamlets Borough Council (2021) Reuse, Recycling and Waste Supplementary Planning Document. Available online at: <https://talk.towerhamlets.gov.uk/rrwp>



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London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix G - Assessment of Site Allocations and
Alternatives



London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix G - Assessment of Site Allocations and
Alternatives

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Introduction

This Appendix sets out the findings of both the red, amber, green (RAG) analysis and site assessments for both the Proposed Site and Alternative Site allocations.

RAG Analysis

An initial red, amber, green (RAG) assessment for both the site allocations and alternative sites was undertaken using spatial indicators for each of the IIA Appraisal Framework objectives.

Relevant data on spatial environmental, social and economic indicators, as well as those specifically relevant to health and equalities, have been loaded onto an online WebGIS platform, which has facilitated the site assessments.

It should be noted that the RAG assessment simply highlights the potential sensitivity of different indicators, it doesn't necessarily mean that the indicators are good or bad. For instance, an area of overall deprivation could be more highly sensitive to change so scored R, however, development of the site could in turn reduce levels of deprivation.

Due to this professional expertise has been used to review and validate this initial RAG rating to provide the final assessment of each site.

Site Assessments

The assessment of policies, spatial approaches and alternatives has considered the following:

- Overall effect significance (negative, positive, uncertain, potential for both negative and positive effect or negligible)
- Nature of effect (direct, indirect)
- Spatial Extent (local, regional, national)
- Reversibility of effect:
 - Reversible: The receptor can return to baseline condition without significant intervention
 - Irreversible: The receptor would require significant intervention to return to baseline condition
- Duration (short, medium or long term) – Short term: 0-5 years, Medium term: 5-10 years (up to the end of the plan period) Long term: 10+ years (beyond the plan period).

Table G-1 – Key to Assessment

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local – borough wide / regional – Greater London / national - England)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

It should be noted that where uncertain and negligible effects have been identified, it has not been possible to determine the nature of effect, the spatial extent, the reversibility or the duration of effect. In this instance, these cells have been left blank.

Proposed Site Allocations RAG Analysis

Due to the quantity of sites, RAG analysis results have been split into Table G-2 and Table G-3.

Table G-2 - Proposed Sites RAG Analysis results

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA1 Population Density	Amber	Amber	Red	Red	Amber	Red	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Red	Red
IIA1 Higher Education	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA1 Secondary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber
IIA1 Primary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA1 IMD Overall deprivation (LSOA)	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Red	Red	Amber
IIA2 Open Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Children Centres	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Red
IIA2 Community Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Allotments	Red	Red	Red	Green	Red	Red	Red	Green	Red	Green	Red	Red	Green	Green	Red	Green
IIA2 IMD Health (LSOA)	Amber	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red
IIA2 Life Expectancy Male	Red	Amber	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Green	Green	Red	Red
IIA2 Life Expectancy Female	Amber	Green	Amber	Red	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Red	Amber

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA2 Sport Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Healthcare Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Town Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Neighbourhood Parade	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red
IIA3/4 Primary Shopping Areas	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Red	Red
IIA3/4 Local Industrial Location	Red	Red	Green	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Tower Hamlets Activity Areas	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA3/4 Central Activities Zone	Green	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA3/4 IMD Income (LSOA)	Amber	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA3/4 IMD Employment (LSOA)	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Red	Red	Amber
IIA3/4 Strategic Industrial Locations	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green
IIA5 IMD Barriers to housing (LSOA)	Red	Red	Amber	Red	Red	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Amber
IIA5 House Price	Red	Red	Amber	Amber	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA6 Crime Rate	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA6 IMD Crime (LSOA)	Red	Amber	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA7/8 London Cycle Network	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Red	Red	Green	Green	Green	Green
IIA7/8 Tube Stations	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Red	Green	Green	Red	Green
IIA7/8 Train Stations	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 PTAL	Green	Amber	Amber	Green	Green	Green	Amber	Amber	Amber	Red	Red	Red	Amber	Amber	Red	Amber
IIA7/8 Bus Stops	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 National Cycle Network	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green
IIA7/8 EV Charger Points	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA9 Priority Habitat Inventory	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Red	Amber
IIA9 SAC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SPA	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SSI	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 LNR	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 NNR	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SINC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Green Belt	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrip Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA10 Metropolitan Open Land	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Local Open Spaces	Green	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green
IIA10 London View Management Framework	Red	Green	Red	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Tall Building Zone	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green
IIA10 London Squares	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Strategically Important Skyline	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Listed Buildings	Red	Red	Red	Red	Green	Red	Red	Green	Red	Green	Green	Amber	Green	Green	Red	Green
IIA11 Scheduled Monuments	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Heritage at risk	Red	Green	Green	Red	Red	Amber	Red	Amber	Green	Red	Green	Red	Green	Red	Green	Green
IIA11 Conservation Areas	Red	Green	Red	Red	Red	Red	Red	Amber	Red	Red	Green	Amber	Green	Red	Green	Red
IIA11 Parks and Gardens	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Archaeological Priority Area	Red	Red	Green	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrip Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA12 Flood Zone	Green	Red	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red
IIA12 Flood Risk Area	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA13 Water Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA13 Statutory Main River	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Amber	Green	Red	Red	Amber	Red
IIA14 NO2	Red	Red	Amber	Amber	Red	Amber	Amber	Green	Amber	Red	Green	Red	Amber	Amber	Red	Green
IIA14 PM10	Amber	Amber	Amber	Amber	Red	Green	Green	Green	Green	Amber	Green	Red	Amber	Amber	Red	Green
IIA14 Air Quality	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green
IIA15 Climate Risk	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA15 Heat Risk	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA17 Safeguarded Wharves	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Table G-3 - Proposed Sites RAG Analysis results

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
IIA1 Population Density	Red	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA1 Higher Education	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber
IIA1 Secondary Schools	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber	Amber
IIA1 Primary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA1 IMD Overall deprivation (LSOA)	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber
IIA2 Open Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Children Centres	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Red	Green	Green	Red	Red	Green
IIA2 Community Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Allotments	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Red
IIA2 IMD Health (LSOA)	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Red	Amber	Amber	Amber
IIA2 Life Expectancy Male	Red	Red	Red	No data	No data	Green	Green	Green	No data	No data	No data	Green	No data	No data	Green	No data	No data
IIA2 Life Expectancy Female	Amber	Amber	Red	No data	No data	Green	Green	Green	No data	No data	No data	Green	No data	No data	Green	No data	No data
IIA2 Sport Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Healthcare Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
I/A3/4 Town Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A3/4 Neighbourhood Parade	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
I/A3/4 Primary Shopping Areas	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A3/4 Local Industrial Location	Green	Green	Green	Green	Green	Red	Red	Green	Red	Red	Green	Green	Red	Red	Green	Red	Red
I/A3/4 Tower Hamlets Activity Areas	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Amber	Amber	Amber	Green	Green	Amber
I/A3/4 Central Activities Zone	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
I/A3/4 IMD Income (LSOA)	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Red	Amber	Amber	Amber
I/A3/4 IMD Employment (LSOA)	Amber	Amber	Red	Red	Green	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber
I/A3/4 Strategic Industrial Locations	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A5 IMD Barriers to housing (LSOA)	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A5 House Price	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A6 Crime Rate	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A6 IMD Crime (LSOA)	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
IIA7/8 London Cycle Network	Red	Green	Red	Red	Green	Green	Red	Red	Green	Red	Red	Red	Green	Red	Red	Red	Red
IIA7/8 Tube Stations	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green
IIA7/8 Train Stations	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 PTAL	Amber	Red	Amber	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Red	Amber	Green	Green
IIA7/8 Bus Stops	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 National Cycle Network	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Red	Red	Red	Red	Red	Red
IIA7/8 EV Charger Points	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA9 Priority Habitat Inventory	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber
IIA9 SAC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SPA	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SSI	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 LNR	Green	Green	Green	Green	Green	Red	Amber	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber
IIA9 NNR	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SINC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Green Belt	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Metropolitan Open Land	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Local Open Spaces	Green	Red	Red	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
IIA10 London View Management Framework	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Tall Building Zone	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA10 London Squares	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Strategically Important Skyline	Green	Green	Green	Green	Red	Green	Green	Red	Red	Green	Red	Green	Red	Green	Red	Red	Red
IIA11 Listed Buildings	Green	Green	Amber	Amber	Amber	Green	Green	Green	Green	Green	Red	Green	Red	Green	Amber	Green	Red
IIA11 Scheduled Monuments	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Heritage at risk	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Conservation Areas	Red	Red	Red	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green
IIA11 Parks and Gardens	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Archaeological Priority Area	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA12 Flood Zone	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA12 Flood Risk Area	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA13 Water Spaces	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
IIA13 Statutory Main River	Green	Red	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA14 NO2	Green	Green	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber
IIA14 PM10	Green	Green	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green
IIA14 Air Quality	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
IIA15 Climate Risk	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Amber	Green	Red	Amber	Green	Amber
IIA15 Heat Risk	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Red	Amber	Amber	Amber
IIA17 Safeguarded Wharves	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Proposed Site Allocations Assessment Summaries

Bishopsgate Goods Yard

Table G-4 - Bishopsgate Goods Yard

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 500 new homes, of which at least 35% will be affordable and the development will include wheelchair adaptable homes (number of which is tbc). In addition, there will be new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. The existing 5-a-side football pitches currently located on the site will be lost as part of development - it is not clear at this stage whether these will be re-provisioned elsewhere in the borough.
IIA2: Human Health	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, leisure facility, healthcare facilities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site will include a maximum of 11,500sqm of non-residential uses such as retail, workspace, community and cultural. This will include the provision of a leisure facility and an Idea Store, as well as public realm improvements at the ground and platform level. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The site will include employment space/ workshops as well as retail. It is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely increase employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 500 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include 10% wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having Public Transport Accessibility Levels (PTAL) scores ranging between 5 and 6b. Other than public realm improvements and increased wayfinding, there are no plans for additional transport provision.
IIA8: Accessibility	++	H	D	R	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to walking and cycling routes to and from the site will establish better connections with Shoreditch High Street Overground station, Brick Lane District Centre, Shoreditch Triangle and the new open space, and will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	++	M	D	R	I	P	LT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide a significant increase in greenspace and GI, through the provision of open space (with a minimum size of one hectare) integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park located above the Braithwaite Viaduct.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape. The site is located within two London View Management Framework (LVMF) areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Pauls Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. There is also potential for negative effects to arise depending on the height of developments at the site. Whilst development should be stepped down to the eastern end of the site, there is potential for the height of developments to negatively affect the local landscape and views.

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within an archaeological priority area, and partially located in the South Shoreditch, Redchurch Street and Brick Lane and Fournier Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The proposed site aims to restore and repair the existing Grade II listed Braithwaite Viaduct and adjoining structures. Enhancement to the public realm will also help to improve the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more green infrastructure (GI) and open space will help to reduce the Urban Heat Island (UHI) effect. The inclusion of sustainable drainage systems (SuDS) is expected, however specific details are not known at this stage. The design of the scheme will include measures to prevent overheating.
IIA16: GHG Emissions	+/-	M	D	L	I	P	LT	There are likely to be significant greenhouse gases (GHG) emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The scheme is expected to make use of Air Source Heat Pumps and be delivered via an electricity-led strategy. Buildings are expected to be energy efficient to reduce reliance on heating.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it will result in the loss of the 5-a-side pitches. It is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA1/2: If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Brick Lane and Pedley Street site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Brick Lane and Pedley Street site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Brick Lane and Pedley Street site.</p> <p>IIA14: If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Brick Lane and Pedley Street site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Brick Lane and Pedley Street is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/17: The 5-a-side football pitches should be re-provisioned elsewhere in the borough, to avoid a loss in community facilities.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum urban greening factor (UGF) and biodiversity net gain (BNG) targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the Construction Environmental Management Plan (CEMP). The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Table G-5 - London Dock

Site Name	London Dock							
Site Capacity	1800							
Site Source	Existing allocation							
Site Status	Consented, under construction.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The development as a whole could deliver up to 1,800 new homes of which a minimum of 35% will be affordable homes. It will be a mixed-use, predominantly residential development. This will include offices, restaurants, shops and a school within twelve multi storey buildings and a one to two storey basement across the footprint of the site. At least 10% of homes will be wheelchair accessible and adaptable. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. This includes Shadwell DLR station and Shadwell train station both, of which, are wheelchair accessible and within 1km of the site as well as nearby bus stops.
IIA2: Human Health	++	H	D/I	R	I	P	LT	As well as housing, the site includes up to 21,500sqm of non-residential floorspace which will provide new retail and employment opportunities, healthcare facilities new secondary school, new parks and open spaces and improvements to the public realm. It is also located within close proximity to existing healthcare and leisure facilities, as well as open spaces which includes Swedenborg Gardens and St George's Gardens that are under 0.5km away which would encourage walking and cycling. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. Homes that are made accessible and adaptable for disabled and wheelchair users would, therefore, increase human health. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	At present the site is located near to central activities zones which includes St Mellons Business centre and primary shopping areas as well as town centres. The development's provision of non-residential floor space such as those which support offices, restaurants and shopfronts. Considering this site is located in the 30-50% most employment deprived and 10-20% income deprived areas, the development will result in a significant increase in the number and diversity of jobs and will improve and enhance connectivity between business clusters and the housing market.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	Considering this site is located in the 30-50% most employment deprived and 10-20% income deprived areas, the development will result in a significant increase in the number and diversity of jobs and will improve and enhance connectivity between business clusters and the housing market. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 1800 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and at least 10% will include wheelchair accessible and adaptable homes. The size, type and tenure of housing takes into account different

Site Name	London Dock							
Site Capacity	1800							
Site Source	Existing allocation							
Site Status	Consented, under construction.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.
IIA6: Crime & Safety	+	M	D	L	R/I	P/T	ST/LT	The site is currently located within an area of moderate crime deprivation (30-50% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	R	I	P	LT	The site is well located to local facilities and services such as bus, rail and underground services within 0.8km and has a PTAL score between 2 and 4. Moreover, other than public realm improvements of pedestrian, cycle paths and increased wayfinding, there are no plans for additional transport provision.
IIA8: Accessibility	++	H	D	R	I	P	LT	The site already includes a range of facilities, and the proposal includes further provision for community facilities and services. Improvements to pedestrian, cycling and wayfinding will provide better access to the Thomas More Neighbourhood Centre, St Katharine Docks, Tobacco Dock and the Wapping Canal, and to improve walking and cycling connections across the Highway for all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. The site will also provide safe access routes to the new secondary school.
IIA9: Biodiversity & Natural Capital	++	H	D	L	R/I	P	LT	The proposed landscaping will provide a good diversity of nectar-rich flowers, including some night-scented species, which will provide forage for bees and other pollinators and contribute to Local Biodiversity Action Plan (LBAP) objectives. Priority habitats are located to the East (Wapping Woods), North-East (St George's Gardens) and south of the site (Wapping Gardens). On-site landscaping and green roofs proposed under this development are expected to provide a significant net gain in biodiversity, outweighing any potential adverse effects via overshadowing.
IIA10: Landscape & Townscape	+	H	D	L	R/I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm, particularly along the Highway and Vaughan Way, will enhance the quality and condition of the townscape and landscape. Overlooking from residential plots into the school playground would be controlled with high screens and dense vegetation. These would provide a barrier between the school and its surroundings at all levels. The screens are planted with species which would assist in improving the air quality and biodiversity of the area.
IIA11: Historic Environment	+/-	M	D	L	R/I	P/T	ST/LT	The Grade II listed Pennington Street Warehouse is located directly south east of the site. The site also falls to the west of the Tower of London, which is designated as a World Heritage Site. The site is located in close proximity to numerous conservation areas and within an archaeological priority area. A Scheduled monument (Roman Bath House, Shadwell) is also located to the east of the site. The proposed site aims to repair and modify the existing Grade II listed warehouse and adjoining structures. Enhancement to the public realm will also help to improve the setting of the historic environment. There is

Site Name	London Dock							
Site Capacity	1800							
Site Source	Existing allocation							
Site Status	Consented, under construction.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								potential of disturbance to archaeology from excavation works during construction and for construction works to adversely affect local heritage assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is situated in a flood risk area classing the development as more vulnerable as it sits in flood zone 3. Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	M	D	L	R/I	P/T	ST/LT	Air quality at this site has moderate levels of NO ₂ and PM ₁₀ and sits within an Air Quality Management Area (AQMA). The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. It is assumed that additional mitigation strategies will be incorporated considering the development of a secondary school on the site. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a medium to high overall climate risk and heat risk rating. Whilst the addition of more GI, open space and green roofs will help to reduce the UHI effect, not all climate resilience measures are known at this stage. The site is also situated in a flood risk area classing the development as more vulnerable as it sits in flood zone 3
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development is expected to make use of decentralised energy and solar PV, as well as incorporate energy efficient measures to reduce energy needs. Further design details are still required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	London Dock							
Site Capacity	1800							
Site Source	Existing allocation							
Site Status	Consented, under construction.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA1/2: If construction of this site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site will significantly increase the number of businesses and jobs.</p> <p>IIA5: In combination, this site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the neighbouring Tobacco Dock site</p> <p>IIA14: If construction of this site and the Tobacco Dock were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of this site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 10% accessible homes. A range of housing options to suit all housing needs within the community is necessary in line with policies HF1 and HF2. Development specific EqlAs should be undertaken to ensure inclusive housing is delivered.</p> <p>IIA1/2: Further assessment of part of scheme level design should incorporate an evaluation of the provision of healthcare to ensure that the current supply is sufficient in supporting new communities. The application of policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3: Where the site is located adjacent to a designated town centre, policies TC1-TC8 will ensure that development outside of the town centre will not detrimentally impact on the existing town centre, allowing centres to remain vibrant and sustainable and demonstrating vitality.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features and heritage assets.</p> <p>IA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: Development should be delivered in line with policy CG6, the NPPF and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Marian Place Gasworks and the Oval

Table G-6 - Marian Place Gasworks and the Oval

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	This site will provide up to 700 new homes of which 35% will be affordable housing. The development will also include 55 wheelchair accessible homes. In addition, the site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. This will also include 1.0 hectares of publicly accessible open space. The site will include new retail and employment opportunities and has current access to healthcare and community facilities; however, no new healthcare facilities are proposed for this site.
IIA2: Human Health	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health. As well as housing, the site includes a minimum of 4,000sqm of new non-residential floorspace, which will provide new retail and employment opportunities, and supports urban greening through the provision of new parks and open spaces to encourage and improvements to the public realm. It is noted that no new healthcare facilities are included within the development. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site will include active uses through the formation of new shopfront openings and public realm improvements at the ground floor level. The site will prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The site is not located within a main town centre; therefore, any main town centre uses must ensure they do not impact on the vitality of existing high streets. The site will provide a range of office, industrial and studio workspaces meeting the needs for businesses serving a more local need, start-ups, small to medium enterprises and creative industries.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The site will provide a minimum of 4,000sqm of new non-residential floorspace which will include employment space, in particular for start-ups, small and midsize enterprises (SMEs) and creative industry businesses, as well as retail, supporting further job opportunities in the area. The site will provide a range of office, industrial and studio workspaces meeting the needs for businesses serving a more local need, start-ups, small to medium enterprises and creative industries, therefore diversifying the labour market. The site is outside the Activity Area, and so will improve employment opportunities within the locality. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of up to 700 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities. In addition, the site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.
IIA6: Crime & Safety	+	M	I	L	R/I	P/T	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied. The site will include a range of uses and improving public realm including active uses at ground floor level, which will improve overall natural surveillance. Overall, it is considered that the development of the site will inherently improve the perception of safety within the area. The increase of passive surveillance and public foot and cycle traffic, through and around the site, will significantly improve the security of the area.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site has very good access to sustainable transport as it is located in close proximity to Cambridge Heath station, Bethnal Green underground station, a number of bus stops and a cycle hire scheme, as reflected in a PTAL score between 4-6a. The site includes a new cycle and pedestrian network around the perimeter to improve connectivity with the Cambridge Heath Neighbourhood Centre and along the waterfront at the Regents Canal. Long-stay cycle parking spaces will also serve the site.
IIA8: Accessibility	++	H	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. It is expected that improvements to wayfinding across the site including Legible London Signage which will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel due to improvements in connectivity with the Cambridge Heath Neighbourhood Centre and along the waterfront at the Regents Canal.
IIA9: Biodiversity & Natural Capital	+/-	M	D	R	R	P	LT	There are no statutory nor non-statutory designated sites of nature conservation interest within or adjacent to the development site. The Northern boundary of the development site adjoins Regent's Canal, which forms part of the London's Canals Site of Importance for Nature Conservation (SINC). The site is also located in close proximity to a number of other SINC's. The development site mainly comprises of areas of extension existing hardstanding and bare ground, with large areas devoid of any vegetation cover and a limited range of species. It is assumed that the potential impacts from pollution are avoided through good construction practice. The green roofs, landscaping and other biodiversity features will enhance the biodiversity of the site. In addition, all proposals for development within the site allocation will look to contribute to an overall provision of 1ha of new public open space

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								across the allocation as a whole, delivered through a number of smaller open spaces and pocket parks. This could help to increase biodiversity on site.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site aims to achieve high quality sustainable design for buildings, spaces and 1ha of publicly accessible public realm, which will improve the quality and condition of the townscape and landscape. The site is located within the alignment of the background Wider Setting Consultation Areas of the LVMF SPG views from West Minster Pier to St Paul's and the Queen's Walk to Tower of London. The development will re-use The Oval (which is designated as Local Open Space and Identified as a London Square) as a new public open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. There is also potential for negative effects to arise depending on the height of developments at the site. Whilst development should be stepped down around the former gasworks, there is potential for the height of developments to negatively affect the local landscape and views.
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is partially located in the Regent's Canal Conservation Area, and Adjacent to the Hackney Road Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. The proposed site will be built upon the existing gas holders, the guide frames no.2 and no.5 of which are located within and contribute positively to the Conservation Area; however, they are subject to a Certificate of Immunity from Listing and considered as non-designated heritage assets. Guide frames will be refurbished to ensure their long-term future, the proposed buildings will pay homage to the gasholder shapes and forms to reflect the industrial legacy of the site. Enhancement to the public realm will also help to improve the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+	M	D/I	L	R/I	P/T	ST/LT	The site is located in an area which has a high overall climate risk and heat risk rating. During construction and operation, the site will have a minor adverse residual effect on GHGs. The addition of more GI and open space will help to reduce the UHI effect. SuDS are expected to be delivered within the works at the site.

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	+	M	D/I	L	R/I	P/T	ST/LT	During construction and operation, the site will have a minor adverse residual effect on GHGs. The building fabric of the Proposed Development will incorporate energy efficient design and support opportunities for renewable energy production
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage, it is not clear the extent of re-use and re-cycling of materials.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The site includes brownfield land. The site will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Devons Road.</p> <p>IIA1/2: If construction of this site and the Devons Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Devons Road site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Devons Road site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Devons Road.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Devons Road.</p> <p>IIA14: If construction of this site and the Devons Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Devons Road site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Devons Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Devons Road is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further Assessment as part of the scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that current supply is sufficient in supporting new communities.</p> <p>IIA6: The development should be designed in accordance with the Secured by Design Principles and Policies PS3 and PS4.</p> <p>IIA9: Other policies in the Local Plan should help to avoid potential negative effects, e.g. Policies BO1, BO2, BO3, BO and BO5. The site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Whitechapel South

Table G-7 - Whitechapel South

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	L	I	P	LT	<p>The site will provide 837 new homes and has potential to provide at least 425 new rooms for students, which will work positively towards achieving the borough's housing target. The provision of student accommodation is harmonious with the position of the Queen Mary University of London campus. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the third most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public. Overcrowding is significant at this location, with 19965p/h compared to the borough average of 15,695p/h. The provision of communal amenity space under this development would be beneficial to residents. These units have the potential to benefit both students and the wider community, by delivering other priorities such as affordable housing. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>The site safeguards an existing health facility (Royal London Hospital) within the allocation and is also located within close proximity to other existing healthcare and leisure facilities. The site will also provide an NHS primary health care facility (including the re-provision of the existing sexual health and other services).</p> <p>As well as housing and healthcare, the site includes 93,000sqm non-residential floorspace, which will provide new retail and employment opportunities, and supports urban greening through the provision of open spaces to encourage and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.</p> <p>The site does have good access to healthcare and community facilities; however, it is not clear whether the current provision will meet the needs of the new student population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.</p>

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as within part of Whitechapel's bustling town centre and thriving night-time economy. The new town hall in Whitechapel and permanent Residents' Hub supports town centre revival. The site lies within Whitechapel district centre, with both Whitechapel High Street and Whitechapel Market designated as Conservation Areas. The High Street is characterised by small-scale retail and industrial enterprises, and the Market is one of the borough's main local shopping areas. The site will improve town centre viability, with main town centre uses and employment led development proposed within the site including the formation of new shopfront openings and public realm improvements. These measures can support the strategic role of Whitechapel as an emerging hub for life sciences, bio-tech and digital industries.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The site is within the Whitechapel Local Employment Location with an emerging creative, digital, and ICT hub. It is well located to existing employment areas including the City Fringe Activity Area and the Central Activities Zone. The proposal of an economic led development will provide 93,000sqm of non-residential floorspace which will increase employment opportunities, in particular within the life sciences sector. The site will also provide improved access to existing employment opportunities in the surrounding area. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	L	I	P	LT	The site provides a net gain of over 500+ dwellings, and therefore is sufficient enough to contribute to meeting LBTH's housing supply targets. The site will meet the minimum 35% target of affordable homes. This is beneficial considering its location within a high house price ward. However, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and antisocial behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport, enhanced by the nearby Elizabeth Line station, acting as a catalyst for investment within the ward. This is reflected by the site having a PTAL score ranging between 6a and 6b. The site will enhance connections to the Whitechapel North site allocation, Whitechapel High Street, as well as improved accessibility to the north and south and east and west of the site.

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	L	I	P	LT	The site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. This is particularly important for students who don't have access to their own private car. The site will enhance connections to the Whitechapel North site allocation, Whitechapel High Street, as well as improved accessibility to the north and south and east and west of the site. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	++	M	D	R	R	P	LT	The site will provide improvements to the green grid should be provided along Whitechapel High Street, Stepney Way, New Road, and Cavell Street, along with good quality connections to surrounding green grid routes. The development should contribute to the delivery of a new and improved green open space (the Green Spine) stretching from Philpot Street to the new civic centre. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new Green Spine to maximise its multi-functional use. This will help to significantly increase biodiversity on site.
IIA10: Landscape & Townscape	+/-	H	D/I	L	R/I	P/T	ST/LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The site will contribute to the delivery of the Green Spine (new green open space) stretching from Philpot Street to the new civic centre, which will help to improve visual amenity.
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within the Mile End Archaeological Priority Area (APA), and partially within the London Hospital Conservation Area that is listed on the Heritage at Risk Register. There are also a number of listed buildings within the site allocation, with the potential for a locally listed building to be brought back into use. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration; however, this is dependent on scale, massing, layout and materials. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts on the setting of the London Hospital Conservation Area.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage.
IIA16: GHG Emissions	+/-	M	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development is expected to be provided with a heat network and enhanced building fabric is expected to reduce energy consumption.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction to align with circular economy principles.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The site includes brownfield land. The site will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North and Watney Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward.</p> <p>IIA1/2: If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents. It is unknown if the existing population will respond positively to an increased student population in the area.</p> <p>IIA3/4: In combination, this site and the Whitechapel North and Watney Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents, whilst stimulating the economy and town centre of Whitechapel.</p> <p>IIA5: In combination, this site and the Whitechapel North and Watney Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of overcrowding and affordability.</p> <p>IIA10: If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel North and Watney Market site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Whitechapel North and Watney Market site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Whitechapel North and Watney Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel North and Watney Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable homes and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities, and specifically the new student population. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4, especially in relation to concerns of noise and ASB potentially generated by the new student population.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-8 - London Metropolitan University

Site Name	London Metropolitan University							
Site Capacity	520 student rooms							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site has potential to provide at least 520 new rooms for students, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. Overall deprivation is very high, so affordability needs to be a key consideration.</p> <p>The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will provide an additional 33,500 sqm of educational floorspace. However, it is unknown whether this will be open to the public.</p> <p>These units will, however, only benefit students and the delivery may compromise the ability to deliver other priorities, in particular affordable housing and facilities which will benefit the wider community. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new student population as well as the wider community. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.</p>
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the town centre. However, there are some businesses located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units may be a key concern.</p>
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely improve access for residents to employment opportunities. There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site has potential to provide at least 520 new rooms for students, which whilst this work positively towards achieving the borough's housing target, it will only benefit students and may compromise the ability to deliver affordable housing.</p>

Site Name	London Metropolitan University							
Site Capacity	520 student rooms							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL score of 6b. The site will help to improve walking and cycling routes to the underground stations at Aldgate and Aldgate East, Whitechapel High Street and to the north of the site at Wentworth Street.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The site will help to improve walking and cycling routes to the underground stations at Aldgate and Aldgate East, Whitechapel High Street and to the north of the site at Wentworth Street. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	+	M	D	R	R	P	LT	Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site will aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm. Although it may not achieve a minimum 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) compared with the pre-development baseline on site, there is potential for the addition of some small habitats.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located within two LVMF areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Paul's Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary, negative effects to the local landscape and townscape setting during construction. There is also potential for negative effects to arise depending on the height of developments at the site. Whilst development should be stepped down towards residential buildings, there is potential for the height of developments in the southwestern corner and north of the site to negatively affect the local landscape and views. Improved public realm and active frontages should be provided at principal entrances to key buildings, including along the Whitechapel High Street frontage, Goulston Street, and Old Castle Street. Due to the small size, the site aims to provide small 'pocket parks' of publicly accessible open space. This will help to enhance the quality and condition of the townscape and landscape within the area.

Site Name	London Metropolitan University							
Site Capacity	520 student rooms							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within the Aldgate and Portsoken APA, and partially located opposite the Wentworth Street and Whitechapel High Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts. This includes ensuring no negative impact on the backdrop of the view of the Tower of London, and the adaptive re-use of existing locally listed buildings to be explored.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands), allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	M	D	L	I	P	LT	Overall climate risk is medium, and the overall heat risk is high. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density student housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	London Metropolitan University							
Site Capacity	520 student rooms							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA1/2: If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA1/6: The site is located in close proximity to existing student accommodation on Whitechapel High St and Leman St which in combination with this site may cumulatively have adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour.</p> <p>IIA3/4: In combination, this site and the Brick Lane and Pedley Street site will significantly increase the number of business and jobs.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Brick Lane and Pedley Street site.</p> <p>IIA14: If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Brick Lane and Pedley Street site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Brick Lane and Pedley Street is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least deliver a minimum of 50% of units as affordable student accommodation in line with policy HF6.</p> <p>IIA1: The site should provide 10% of student rooms which are wheelchair accessible and adaptable, including access to a wheelchair-accessible shower room for independent use in line with policy HF6.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum urban greening factor UGF and BNG targets (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife) set out within the Plan.</p> <p>IIA10: Compliance with the requirements of the London View Management Framework is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Whitechapel North

Table G-9 - Whitechapel North

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	M	D	L	I	P	LT	The site will provide 1,225 new homes, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the third most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. Swanlea Secondary School sits on the border of the site, facilitating access to education. The site will enhance the NHS primary healthcare facility, re-provide and enhance the leisure centre, and provide a new community facility. At this location, issues of overcrowding are lower than the borough average. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
I/A2: Human Health	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, including Whitechapel Sports Centre and a pharmacy. The site will enhance the NHS primary healthcare facility, re-provide the leisure centre, and provide a new community facility.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as within part of Whitechapel's bustling town centre and thriving night-time economy. The new town hall in Whitechapel and permanent Residents' Hub supports town centre revival. The site lies within Whitechapel district centre, with both Whitechapel High Street and Whitechapel Market designated as Conservation Areas. The High Street is characterised by small-scale retail and industrial enterprises, and the Market is one of the borough's main local shopping areas. The site will provide a minimum of 4,500sm of retail space which will help to improve the viability of the town centre. The addition of market facilities as part of the proposed site, including the provision of parking, will help to provide further employment opportunities within the area as well as improving social cohesion of the town centre.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely improve access for residents to employment opportunities. The proposed site will provide at least 4,500sqm of retail space which will increase employment opportunities. There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	L	I	P	LT	The provision of 1,225 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail, with the Elizabeth Line station situated beneath the site. This is reflected by the site having PTAL scores ranging between 6a and 6b. Active transport is also encouraged via the London Cycle Network, central within the site. The site will enhance connections to the Whitechapel South site allocation Whitechapel High Street, Vallance Road, and Brady Street, along with good quality onward connections to surrounding green grid routes such as that along Old Montague Street. Parking for the re-provided supermarket will be provided in a way which minimises the negative impact on the public realm and on primary routes for pedestrians and cyclists.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The site will enhance connections to the Whitechapel South site allocation Whitechapel High Street, Vallance Road, and Brady Street, along with good quality onward connections to surrounding green grid routes such as that along Old Montague Street. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from any designated sites, however, there is potential for some adverse effects on some neighbouring small-scale habitats such as deciduous woodland during construction. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development likely improves townscape and landscape setting. There is also potential for negative effects to arise depending on the height of developments at the site. Whilst development should be stepped down surrounding the tallest points, there is potential for the height of developments to negatively affect the local landscape and views. However, building height is likely to be determined by individual design and is currently unknown.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has a number of heritage assets within its vicinity is predominantly located within the London to Colchester Roman Road TH APA, and partially within the Whitechapel Market Conservation Area. There are two Grade II listed buildings within the site allocation. During

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts. This includes the repairing and incorporating the locally listed building to the north of the Vallence Road within the development.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will also be a temporary negative effect on air quality due to dust generation and emissions from construction of the re-provisioned community facilities. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is predominantly on previously developed land will support the protection of the borough's green spaces. The site will support 1,225 new homes which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel South and Watney Market.</p> <p>IIA1/2: If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Whitechapel South and Watney Market site will significantly increase the number of businesses and jobs.</p> <p>IIA5: In combination, this site and the Whitechapel South and Watney Market site will significantly increase housing stock.</p> <p>IIA10: If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for a negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel South and Watney Market site.</p> <p>IIA14: If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Whitechapel South and Watney Market site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Whitechapel South and Watney Market site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel South and Watney Market is likely to result in a cumulative increase in waste.</p>							

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Brick Lane and Pedley Street

Table G-10 - Brick Lane and Pedley Street

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	L	I	P	LT	<p>The proposed site will provide the 800 homes as well as up to 33,000sqm of non-residential floorspace to include a five-storey office building with ground floor and first floor commercial units and two storey basements for provision of plant, servicing, storage and a gym. This will work positively towards achieving the borough's housing target It is currently unknown how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is very high, so affordability needs to be a key consideration.</p> <p>The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The proposed site will also provide new small public open spaces, such as pocket parks, and improvements to the public realm.</p>
IIA2: Human Health	+	M	D	L	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and additional provisions, however the site will provide new community facilities, enhancements to the public realm and improved connectivity to Allen Gardens, the Truman Brewery Estate and Shoreditch High Street station.</p>
IIA3: Economy & Town Centres	++	H	D	L	I	P	LT	<p>The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as being close to Spitalfields bustling town centre, market and thriving night-time economy. The site will provide a minimum of 33,000sqm of non-residential floorspace to include a five-storey office building with ground floor and first floor commercial units and two storey basements for provision of plant, servicing, storage and a gym. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p>
IIA4: Employment & Skills	++	H	D	L	I	P	LT	<p>The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site will provide a minimum of 33,000sqm of non-residential floorspace. This will likely improve access for residents to employment opportunities. There are a number of small businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	+	M	D	L	I	P	LT	The provision of 800 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6b. Improvements to walking and cycling connections will be provided to connect up Allen Gardens, the Truman Brewery estate, and Shoreditch High Street station. The site will also improve north-south and east-west connections through the existing large number of street bocks currently within the site, such as the Grey Eagle Street car park, the Truman Brewery estate, and the railway lines in the north of the site to improve connectivity.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. Improvements to walking and cycling connections and wayfinding will be provided to connect up Allen Gardens, the Truman Brewery estate, and Shoreditch High Street station. The site will also improve north-south and east-west connections through the existing large number of street bocks currently within the site, such as the Grey Eagle Street car park, the Truman Brewery estate, and the railway lines in the north of the site to improve connectivity. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	-	M	D	L	R/I	P/T	ST/LT	Allen Gardens falls within the Site boundary. Whilst this is designated as an area of open space it is likely to contain some small-scale habitats. There is potential for construction at the site to result in disturbance to this site, local habitat and species, through the inclusion of public open spaces and pocket parks. At this stage BNG is assumed but whether the site BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located within two LVMF areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Paul's Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. There is also potential for negative effects to arise depending on the height of developments at the site. Whilst development should be stepped down on the Fleet Street Hill site, there is potential for the height of developments to negatively affect the local landscape and views. The site will provide improvements to the public realm through the provision of new small public open space. Improvements to the public realm in this area will also include additional street lighting, wayfinding, and street furniture, to create a sense of place.

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within an archaeological priority area, and partially located in the Brick Lane and Fournier Street and Whitechapel High Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The impact of development on nearby heritage assets and conservation areas will be considered. There is potential that tall buildings may negatively impact the setting of the conservation area, however this is to be considered within development. The site will aim to protect and enhance heritage assets, in particular the character of the Fournier Street Conservation Area should be preserved and, where possible, enhanced.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a medium to high overall climate risk and heat risk rating. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is predominantly on previously developed land and will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Bishopsgate Goods Yard.</p> <p>IIA1/2: If construction of this site and the Bishopsgate Goods Yard site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Bishopsgate Goods Yard site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Bishopsgate Goods Yard site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Bishopsgate Goods Yard.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Bishopsgate Goods Yard site.</p> <p>IIA14: If construction of this site and the Bishopsgate Goods Yard site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Bishopsgate Goods Yard site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Bishopsgate Goods Yard is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable homes and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with Policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: Phase 1 habitat surveys should be undertaken to determine if there are any habitats/ species residing in Allen Gardens.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces Compliance with the requirements of the London View Management Framework is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Bow Common Lane

Table G-11 - Bow Common Lane

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	+/-	H	D	R	I	P	LT	The site will provide 1000 new homes, helping towards meeting LBTH's housing target. The ward sits in the second most deprived decile, meaning the high proportion of affordable housing at this site has potential to bring positive effects due to the ward's high levels of deprivation. The further construction of tall buildings, however, will exacerbate existing problems of overcrowding at this site. Overcrowding is significant at this location, with 20605p/h compared to the borough average of 15,695p/h. The provision of communal amenity space under this development will be beneficial to residents. There are also plans to develop a new sixth form centre, provide new retail and employment opportunities, and bring about improvement to the public realm through the enhancement of Bow Common.
I/A2: Human Health	+	H	D	R	I	P	LT	As well as housing, the site includes 2,500sqm of new retail and employment opportunities, new cultural and community facilities, and improvements to open space and public realm. The sites provision of new facilities and enhancement of existing spaces will improve physical and mental health and wellbeing and reduce levels of loneliness. Tall buildings shortcoming to provide a sufficient quantity of open space for all residents may limit the sites potential to provide accessible greenspace to all.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	As of present, the site is not located in or near a Central Activity Zone or Primary Shopping Area. As such, the developments provision of non-residential floor space such as those which support small to medium enterprise; including creative industries and retail will be highly beneficial to the local economy.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The sites inclusion of 2,500sqm employment space (Class B1) as well as retail will take the form of flexible commercial space, enabling a wide range of small to medium enterprises to set up here. This will generate a mix of commercial activity across the area that will in turn create a range of employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	++	H	D	R	I	P	LT	The provision of 1000 new homes will help towards meeting LBTH's housing target, including the provision of affordable housing At least 35% of all units will be affordable and 10% will include wheelchair accessible and adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	M	D	R	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	R	I	P	LT	Despite average PTAL scores (2-3) the site has relatively good access to public transport, with bus stops located in close proximity to the site on Bow Common Lane and Devons Road. Providing better wayfinding may also help to encourage more people to walk and cycle.
IIA8: Accessibility	++	H	D	R	I	P	LT	The site already includes a range of facilities, and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	H	D/I	R	I	P	LT	The site sits immediately south-adjacent to Tower Hamlets Cemetery Park Local Nature Reserve (LNR) and SINC, which contains priority habitat of 'created' chalk grassland, a habitat for particular invertebrates, including the Priority Species Small Blue butterfly. The addition of tall buildings at this Site will likely negatively affect the biodiversity present through overshading and increased visitors to the park. On-site landscaping and green roofs proposed under this development are expected to provide a significant net gain in biodiversity, outweighing any potential adverse effects via overshading.
IIA10: Landscape & Townscape	+	M	D	R	I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	-	H	D/I	R	R/I	P/T	ST/LT	The site does not lie within a conservation area or contain any statutory listed buildings. Tower Hamlets Cemetery Park located north adjacent to the Site comprises a Conservation Area and an Archaeological Priority Area. The site seeks the demolition of the locally listed building present in this area. During construction there is also potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	+	L	I	L	R	T	MT	The use of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers.
IIA13: Water Quality	+	L	I	L	R	T	MT	Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site outlines a car free development other than seven accessible parking spaces which will reduce private vehicle usage and encourage public transport usage amongst residents. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI including green roofs and open space will help to reduce the UHI effect. It is expected that measures for SuDS and minimising overheating will be delivered through the design of buildings and public spaces. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The proposed development seeks to implement energy efficiency measures and renewable energy technologies to deliver CO ₂ emission reductions. Further design details are required to fully assess the GHG reduction potential of these measures.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	++	H	D	R	I	P	LT	The development proposes to replace a vacant brownfield, former utilities site and will support the protection of the borough's green spaces. The sites function as high density housing will help to make the best use of the space.

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Devon Road.</p> <p>IIA1/2: If construction of this site and the Devon Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Devon Road site will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Devon Road site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Devon Road site.</p> <p>IIA14: If construction of this site and the Devon Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Devon Road site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Devon Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Devon Road is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-12 - Chrisp Street

Site Name	Chrisp Street							
Site Capacity	650							
Site Source	Existing allocation							
Site Status	Consented, Amendments under consideration							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 650 new homes, including the re-provision of 124 affordable residential units. The ward sits in the second most deprived decile, meaning the high proportion of affordable housing at this site has potential to bring positive effects due to the ward's high levels of deprivation. The provision of 20,000sqm of communal amenity space under this development will be beneficial to residents. There are also plans to increase commercial floorspace, bringing about new retail and employment opportunities, and provide new public realm, landscaping works and child play spaces.
IIA2: Human Health	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, extension of existing multi-use spaces for community usage, the provision of new child play spaces and improvements to open space and public realm. The sites provision of new facilities and enhancement of existing spaces will improve physical and mental health and wellbeing and reduce levels of loneliness.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The site will encourage a mix of town centre uses including evening and night-time use and a market which will boost the overall vibrancy of Chrisp Street. Enhancements to the existing district centre and market will generate significant new employment and additional annual spend within the area, boosting the local economy.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The sites inclusion of employment space (Class B1) as well as retail will take the form of flexible commercial space, enabling a wide range of small to medium enterprises to set up here. This will generate a mix of commercial activity across the area that will in turn create a range of employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 650 new homes will help towards meeting LBTH's housing target. This will include the re-provision of 124 affordable units which will be beneficial to low-income groups in the area. The development recognises that homes must be designed specifically to meet the needs of disabled people but does not set a specific target of what percentage of new units will be wheelchair accessible and adaptable.
IIA6: Crime & Safety	+	M	D	R	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.

Site Name	Chrisp Street							
Site Capacity	650							
Site Source	Existing allocation							
Site Status	Consented, Amendments under consideration							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	H	D	R	I	P	LT	The site has good accessibility to sustainable transport, with access to numerous bus tops on Chrisp Street and East India Dock Road, as well as All Saint DLR Station located 50m south east of the site and Langdon Park DLR Station located 160m north of the site. This will help to encourage the new population to seek sustainable transport alternatives. Improving accessibility to services will also help to reduce the need to travel.
IIA8: Accessibility	+	H	D	R	I	P	LT	The site already includes a range of facilities, and the proposal includes further provision for community facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+	L	D	L	R	P	MT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide a significant increase in greenspace and GI, which could help to provide new small-scale habitats.
IIA10: Landscape & Townscape	+	M	D	R	I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this Site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+	H	D	R	I	P	LT	The site sits within an Archaeological Priority Area. The developments intention to retain and enhance the existing heritage assets present at the site including the Festival of Britain housing and retail provision at ground floor level, the Clock Tower and the original 1950's Gibberd masterplan for the market will ensure the site does not damage the local heritage setting of the area
IIA12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.
IIA13: Water Quality	+	L	I	L	R	T	MT	Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
IIA14: Air Quality	-	H	D	R	I	P	LT	There will be temporary negative effects on air quality due to dust generation and emissions from construction. A number of existing residential receptors surround the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents. The site gives no detail as to how increases in operational air pollution will be managed.
IIA15: Climate Change & Resilience	+	M	D	R	I	P	LT	The site is located in an area which has a high overall climate risk and flood and heat risk rating and is likely to have diminishing resilience to climate change. Green walls, brown and green roofs, and street trees will improve urban greening and are expected to reduce the impacts of the UHI effect.

Site Name	Chrisp Street							
Site Capacity	650							
Site Source	Existing allocation							
Site Status	Consented, Amendments under consideration							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
IIA16: GHG Emissions	+/-	M	D	R	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Building efficiency measures are expected to reduce energy reliance. The scheme is also anticipated to make use of heating networks, including the use of combined heat and power and renewable energy, further details are yet to be confirmed.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites Aspen Way and Teviot Estate.</p> <p>IIA1/2: If construction of this site and the Aspen Way and Teviot Estate sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Aspen Way and Teviot Estate sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Aspen Way and Teviot Estate sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Aspen Way and Teviot Estate sites.</p> <p>IIA14: If construction of this site and the Aspen Way and Teviot Estate sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Aspen Way and Teviot Estate sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites Aspen Way and Teviot Estate is likely to result in a cumulative increase in waste.</p>							

Site Name	Chrisp Street							
Site Capacity	650							
Site Source	Existing allocation							
Site Status	Consented, Amendments under consideration							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-13 – Alisa Street

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site will provide 1450 new residential units, which will work positively towards achieving the borough's housing target. The site is located within the 10% most deprived LSOAs in the borough, meaning that development of this site could increase economic opportunities and reduce poverty. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.</p> <p>The site will also provide 6,500sqm commercial floorspace which will provide workspace, retail, and restaurant uses. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males and females.</p> <p>The site aims to deliver new retail facilities, workspaces and community facilities. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. This will help to improve the health and wellbeing for new residents and those living locally.</p>
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site is near Empson Street Strategic Industrial Location, one of London's main reservoirs of industrial and related capacity and is adjacent to Gillender Street Local Industrial Location. The site is not within a town centre, nor is it proposed for any town centre uses. The proposed land uses include the re-provision of existing employment, therefore retaining the current uses rather than revitalising the economy. Affordability of new units may be a key concern for existing business owners.</p>
IIA4: Employment & Skills	+	M	D	L	I	P	LT	<p>As well as housing, the site includes the re-provision of existing employment capacity on-site, including complementary commercial uses which support SME, creative industries and new retail. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 1450 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. The development recognises that homes must be designed specifically to meet the needs of disabled people which is reflected in the 10% wheelchair accessible and adaptable homes to be provided.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has relatively low PTAL scores ranging between 1b and 3, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13. The site will aim to facilitate a new or extended bus route through the site to enhance access to public transport, as well as improving access to public transport and walking and cycling routes across the River Lea.
IIA8: Accessibility	+	M	D	L	I	P	LT	There are plans to improve walking and cycling connections to, from and within the site, and support the provision of new and improved A12 and River Lea crossings, to encourage active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. Improvement in walking and cycling connections will improve accessibility, especially for the most deprived.
IIA9: Biodiversity & Natural Capital	+/-	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and The Limehouse Cut Conservation Area which is also designated a SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity along the water edges and within open spaces, which could help to provide new small-scale habitats.
IIA10: Landscape & Townscape	+	M	D	L	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The riverside frontage provides a key opportunity to provide high quality spaces that will become part of the public realm, and design principles highlight the need to improve riverside accessibility and the potential to improve access to the Lea River Park and Queen Elizabeth Olympic Park.

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, and adjacent to the Limehouse Cut Conservation Area. The site is close to a number of listed buildings, with the Former Bromley Hall School (Grade II) listed on the Heritage at Risk Register. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
IIA12: Flooding	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is directly adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. The site does, however, include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, the development will be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
IIA13: Water Quality	+/-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts during construction. Once operational, the incorporation of rain and stormwater harvesting could lessen the environmental impact of urbanisation on stormwater drainage systems and the River Lea, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+	H	D	L	I	P	LT	Overall climate risk and overall heat risk is high. The landscape design will include a mixture of shrub and tree planting and biodiverse roofs which will contribute towards reducing the UHI, measures to limit overheating are also expected to be delivered which will increase the climate resilience of the development. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	+-	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The design of the scheme will incorporate energy efficiency measures and will ensure that construction is undertaken efficiently. A centralised combined heat and power system is expected to be delivered. Solar PV has been identified as a suitable renewable energy source for the site.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has an existing safeguarded waste site, which may be released for other uses due to being an area of regeneration. Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The site includes brownfield land and is also identified as containing vacant land. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Teviot Estate, Aberfeldy Estate and Leven Road. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Teviot Estate, Aberfeldy Estate and Leven Road site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Teviot Estate, Aberfeldy Estate and Leven Road site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Teviot Estate, Aberfeldy Estate and Leven Road is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential. Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA13: Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Leven Road

Table G-14 – Leven Road

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site will provide 2800 new residential units, which will work positively towards achieving the borough's housing target. At least 35% will be affordable homes (70% affordable rent and 30% shared ownership). In addition, there will be new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site is located within the 10% most deprived LSOAs in the borough, meaning that development of this site could increase economic opportunities and reduce poverty. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.</p> <p>The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males and females.</p> <p>The site will include additional community facilities including a secondary school, strategic consolidated open space which should include space for sport and recreation. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. This will help to improve the health and wellbeing for new residents and those living locally.</p>
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	<p>The site allocation includes allowance for employment, through a variety of commercial units and 8,500sqm of commercial floorspace. The site is located near to Chrisp Street district centre and Poplar High Street neighbourhood centre, providing opportunities for residents to live locally and improve connectivity between the housing market and town centres. The proposed site will include the formation of new shopfront openings and public realm improvements at the ground and platform level. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p>
IIA4: Employment & Skills	+	M	D	L	I	P	LT	<p>As well as housing, the site includes the re-provision of existing employment capacity on-site. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 2800 new homes will help towards meeting LBTH's housing target. The site is proposed to meet the minimum 35% target of affordable homes. The development recognises that homes must be designed specifically to meet the needs of disabled people to this end, 10% of new units will be wheelchair accessible and adaptable.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community. The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.
IIA7: Sustainable Transport	-	M	D	L	I	P	LT	The site has low PTAL scores ranging between 1a and 2, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13.
IIA8: Accessibility	+	M	D	L	I	P	LT	There are plans to make cross river connection improvements, including the new 500m riverside walk, crucial to facilitate active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. Improvement in walking and cycling connections will improve accessibility, especially for the most deprived.
IIA9: Biodiversity & Natural Capital	+/-	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and near The Limehouse Cut Conservation Area. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity along the water edges and within open spaces, which could help to provide new small-scale habitats. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	++	H	D	R	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The riverside frontage provides a key opportunity to provide high quality spaces that will become part of the public realm, and design principles highlight the need to improve riverside accessibility. The site includes strategic scale open space provision, supporting the borough's strategy to reduce open space deficiency.

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, and near to the Limehouse Cut Conservation Area. The site is a former gas works, therefore retaining and integrating the characteristic gasholders in the provision of open space has associated benefits. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
IIA12: Flooding	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is directly adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. The site does, however, include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, the development will be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
IIA13: Water Quality	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts during construction. Once operational, the incorporation of rain and stormwater harvesting could lessen the environmental impact of urbanisation on stormwater drainage systems and the River Lea, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+	H	D	L	I	P	LT	Overall climate risk and overall heat risk is high. The delivery of the site is expected to be landscape-led and will provide a green infrastructure grid and large green spaces which will improve the UHI effect. Measures to reduce the risk of overheating have been incorporated into the design of residential homes. SUDs measures will include living roof and rainwater harvesting. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
IIA16: GHG Emissions	+/-	M	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. A site wide heat network is expected to be delivered. Measures to improve energy efficiency will reduce energy demand.,

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The site is derelict brownfield land. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p>							

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10/IIA11: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the World Heritage Site Management Plans is essential. Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Aberfeldy Estate

Table G-15 – Aberfeldy Estate

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	H	D	R	I	P	LT	The has potential to provide at least 1550 new homes, of which at least 35% will be affordable. In addition, there will be new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The needs of all groups are taken into account, with provision of a mosque nearby providing a vital cultural facility. The site has potential to provide additional community spaces, including a primary school, as well as the potential for extra-care accommodation or accommodation for people with learning disabilities. This will improve the provision of services for the community.
I/A2: Human Health	++	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. However, the development of new primary school provision, including playing fields and sports facilities is likely to improve the health and wellbeing of children around the site and Leaside area, providing play and educational facilities. Additionally, the site has potential to provide extra-care accommodation or accommodation for people with learning disabilities.
I/A3: Economy & Town Centres	++	H	D	L	I	P	LT	The site is well located, within Aberfeldy neighbourhood centre, near to Chrisp Street district centre and Poplar High Street neighbourhood centre, <1 km from Canary Wharf Major Centre, and the Isle of Dogs Activity Area. Aberfeldy neighbourhood centre provides a range of shops and services to meet the needs of its local catchment, with a higher proportion of convenience retail compared to comparison retail. The development aims to create a new local centre on Aberfeldy Street, with shops, workspaces, a community centre and mosque. New commercial space will include the provision of affordable workspace for local businesses.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The proposed site is partially located in a town centre (Aberfeldy neighbourhood centre) and is adjacent to a primary shopping area (Chrisp Street primary shopping area), providing opportunities for residents to live locally and improve connectivity between the housing market and town centres. The development aims to provide shops and new commercial space, including affordable workspace for local independent businesses. This will likely increase employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	+	M	D	L	I	P	LT	The provision of 1550 new homes will help towards meeting LBTH's housing target. The site is proposed to meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-30% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	-	M	D	L	I	P	LT	The site has relatively low PTAL scores ranging between 1b and 3, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13. The site will, however, provide improved walking and cycling connections to, from and within the site.
IIA8: Accessibility	+	M	D	L	I	P	LT	There are plans to improve walking and cycling connections to, from and within the site, and support repurposing the existing A12 underpass to create a new walking and cycling route to improve connectivity across Poplar. Creation of healthy streets will also encourage active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	++	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and near The Limehouse Cut Conservation Area. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity through creation of new public realm and upgrades to existing open spaces, which could help to provide new small-scale habitats. The site is expected to deliver an integrated approach to open space, biodiversity and the natural environment through the provision of GI.
IIA10: Landscape & Townscape	++	H	D	R	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The site includes strategic open space provision and has plans for new high-quality planting and landscaping, supporting the borough's strategy to reduce open space deficiency.
IIA11: Historic Environment	+/-	M	D	L	R/I	P/T	ST/LT	The site is located within the Lea Valley and Limmo APA, and near to a number of conservation areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment. Open space within the site will be maintained, and a larger provision of open and amenity spaces will also be provided, integrating new green development into the existing surrounding context. The site will have an overall positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area.

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA12: Flooding	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. No details are currently understood relating to flood risk measures for the site.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts.
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk is high and overall heat risk is medium. Development specific climate resilience measures are not known at this stage; however, the incorporation of GI will help to alleviate the UHI effect.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Teviot Estate, Ailsa Street and Leven Road. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Teviot Estate, Ailsa Street and Leven Road site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Teviot Estate, Ailsa Street and Leven Road site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p>							

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Teviot Estate, Ailsa Street and Leven Road site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Teviot Estate, Ailsa Street and Leven Road site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Teviot Estate, Ailsa Street and Leven Road site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Teviot Estate, Ailsa Street and Leven Road is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the World Heritage Site Management Plans is essential. Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-16 – Bromley by Bow

Site Name	Bromley by Bow							
Site Capacity	1300							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site has potential to provide approximately 1,300 homes, of which 35% will be affordable. This will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable.</p> <p>The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including educational provision and community facilities.</p>
IIA2: Human Health	++	H	D	L	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is in the top 30-50% nationally. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The provision of open spaces including a 1.2ha park is expected to deliver further health benefits for the population.</p> <p>Additionally, the site development states that residents of the proposed site would not be exposed to excessive noise or other pollution from Bow Free Wharf. This would minimise stress caused by excess noise and improve human health.</p>
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	<p>There are no town centres within 1km of the site, but Stroudley Walk primary shopping area is located 300m from the site. The site is anticipated to contain employment-generating business space, likely to improve the economy of the area.</p>
IIA4: Employment & Skills	+	M	D	L	I	P	LT	<p>The site is in the 10-20% least deprived nationally in terms of employment. The sites anticipated to contain employment-generating business space, and community and educational facilities to provide employment and upskilling opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>
IIA5: Housing	+	H	D	R	I	P	LT	<p>The provision of 1,300 new homes will help towards meeting LBTH's housing target. It is assumed that the site will provide 35% affordable housing, meeting the minimum target. Further details will be required regarding the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.</p>
IIA6: Crime & Safety	+	M	D/I	L	I	P	LT	<p>The site is located in the 30-50% most deprived nationally in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to</p>

Site Name	Bromley by Bow							
Site Capacity	1300							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community. Additionally, the site includes improvements to safety within the underpass beneath the A12, as well as improvements to at-grade pedestrian and cycle crossings. This will contribute to improving pedestrian safety at junctions, as well as the feeling of safety.</p> <p>The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.</p>
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station, the underground and the cycle network. This is reflected in the site having a PTAL level of between 3 and 6a. The site is well located to local facilities and services which will allow residents to live their lives more locally.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D/I	L	R/I	P/T	ST/MT	There is an area of priority habitat for mudflats located 30m east of the site. There is a potential negative effect on this habitat as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI; however, it is unknown whether the site will be in line with BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	+/-	M	D/I	L	R/I	P/T	ST/MT	The site is located 40m from an area of Local Open Green Space (St Leonard's Churchyard). It is therefore expected that the development of the site will respond to the existing character of the surrounding built environment, taking into particular consideration the massing of the surrounding area. There are likely to be temporary negative effects to the local landscape and townscape setting during construction, however, the site will incorporate GI as part of the design including the increase in public realm and public open spaces.
IIA11: Historic Environment	-	L	D/I	L	R/I	P/T	ST/MT	The site has a number of heritage assets within its vicinity, is adjacent to Three Mills Conservation Area and is located within Lea Valley Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.

Site Name	Bromley by Bow							
Site Capacity	1300							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The incorporation of GI will help to alleviate the UHI effect.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North.</p> <p>IIA1/2: If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Whitechapel North site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Whitechapel North site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Whitechapel North.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel North site.</p> <p>IIA14: If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Whitechapel North site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Whitechapel North site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel North is likely to result in a cumulative increase in waste.</p>							

Site Name	Bromley by Bow							
Site Capacity	1300							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further Assessment as part of the scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that current supply is sufficient in supporting new communities.</p> <p>IIA6: The development should be designed in accordance with the Secured by Design Principles and Policies PS3 and PS4.</p> <p>IIA9: Other policies in the Local Plan should help to avoid potential negative effects, e.g. Policies BO1, BO2, BO3, BO and BO5. The site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between public realm and open spaces.</p> <p>IIA10: Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA12: Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: The application of policy CG9 will help ensure that measures to improve air quality should be implemented on site during construction and operation</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Blackwall Trading Estate and Leamouth Road Depot

Table G-17 – Blackwall Trading Estate and Leamouth Road Depot

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	R	I	P	LT	The site has potential to provide approximately 775 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
IIA2: Human Health	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is in the top 30-50% nationally. Life expectancy for males and female are also lower than the national average. The site includes the development of a primary health care facility or community facility as required at the site. This will aid in ensuring that there is adequate healthcare and community infrastructure for the increasing population in and around the site.
IIA3: Economy & Town Centres	+	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the top 10-20% most deprived nationally in terms of income. The site is located near London City Island town centre. At this stage it is not known if the site will include any additional retail or business spaces.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the top 10-20% most deprived nationally in terms of employment. The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 775 new homes will help towards meeting LBTH's housing target. It is assumed that the site will provide 35% affordable housing, meeting the minimum target. Further details will be required regarding the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community. The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	L	D	L	I	P	LT	The site has average to good connectivity via public transport through bus and Overground rail, but the site is located 1.75km from the closest tube station. This is reflected in the PTAL score of between 2 and 5. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	H	D/I	R	R/I	P/T	ST/LT	Construction has potential to have temporary adverse effects on the adjacent Bow Creek Ecology Park SINC (across the River Lea in the London Borough of Newham) as well as the mudflat priority habitat, which falls within the site boundary. Habitats are likely to be affected by increase in noise and vibration, temporary reductions in air quality as well as potential land take and/or habitat fragmentation. However, the development aims to incorporate a 'significant amount' of riverside public open space, with elements of biodiversity that complement the adjacent Bow Creek Ecology Park SINC.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located near designated local open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting, particularly through the incorporation of riverside public open space.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Lea Valley archaeological priority area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	--	M	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The incorporation of GI will help to alleviate the UHI effect.

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the Leven Road site.</p> <p>IIA1/2: If construction of this site and the Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Leven Road site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Leven Road site will significantly increase housing stock.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Leven Road site.</p> <p>IIA14: If construction of this site and the Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Leven Road site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Leven Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring Leven Road site is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features or local heritage assets.</p> <p>IIA8: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA12: Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p>IIA13: Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to</p>							

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Hackney Wick Station

Table G-18 - Hackney Wick Station

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site will provide a minimum of 800 residential properties (300 within Tower Hamlets). The area is located within the 30-50% most deprived neighbourhoods, and it is expected that the site will deliver 35% affordable housing. This site may also be suitable for extra-care accommodation. A range of sizes of housing unit will meet housing requirements for all. It is expected that at least 10% of each tenure type will be designed to be wheelchair user dwellings and located where there is suitable access for parking.</p> <p>The site will be served by a nursery, library and associated community uses which will help to improve local access to services and bring communities together and supporting the changes demographics of the area.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and some community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. As well as housing, the site will include new employment opportunities, and will include new open spaces. The site will therefore reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness, ensuring that the needs of all groups will be met now and in the future.</p>
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	<p>The site will include the provision of active frontages and public realm improvements at ground floor level and prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The site is located within the Hackney Wick neighbourhood centre and so the addition of new retail spaces will improve the vitality of the high street. The site will also replace the existing employment, cultural, creative, retail and residential uses (including a theatre) with the aim to ensure no net loss in employment opportunities. It is expected that a variety of workspace typologies will be provided to meet the local demand.</p>
IIA4: Employment & Skills	++	H	D	R	I	P	LT	<p>The site will include employment space (Class B1, B2 uses) as well as retail. This will likely increase employment opportunities and improve town centre viability. All employment floorspace at the existing site will be replaced to ensure there is no net loss in jobs. A variety of workspace typologies will be provided, as well as a mixture of cultural uses to support existing and emerging demands for business spaces. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of over 800 new homes (300 in Tower Hamlets) will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include 10% wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities. This site may also be suitable for extra-care accommodation.
IIA6: Crime & Safety	+	M	D	L	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). It is assumed that the proposal will be designed in accordance with the Secured by Design Principles. The site will include a range of uses and improving public realm including active uses at ground floor level, which will improve overall natural surveillance. Overall, it is considered that the development of the site will improve perception of safety. Improvements to internal connectivity will increase passive surveillance through and around the site, which will improve the security of the area.
IIA7: Sustainable Transport	++	L	D	L	I	P	LT	The site is in close proximity to underground and overground stations, as well as a number of bus stops. The site connected to the London Cycle Network and the National Cycle Network. This is reflected in a PTAL score between 2-4. Cycle parking is expected to be delivered as part of the site's development. The site is also proposed to deliver a pattern of land use which prioritises walking and cycling and facilitates short trips.
IIA8: Accessibility	++	H	D	R	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The level of additional services provided on-site will deliver a pattern of land use which prioritises walking and cycling and reduces the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R/I	P/T	ST/LT	There are no statutory or non-statutory designated sites within the site, an area of prior habitat deciduous woodland is located to the south west of the site. The site is also located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide an increase in GI (particularly from the redevelopment of Queen's Yard), which could help to provide new small-scale habitats. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	+	M	D	L	R/I	P/T	ST/LT	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. Improvements to public realm and consideration of the design within will improve townscape and landscape setting.

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+	M	D	L	R/I	P/T	ST/LT	The site lies within the Hackney Wick and Fish Island Conservation Areas and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. It is expected that the site will reduce the number of vacant sites and buildings which currently have a negative impact on the designated heritage assets. The site will demonstrate buildings of industrial character, in-keeping with the existing site.
IIA12: Flooding	--	H	D	L	I	P	LT	The site lies within Flood Zones 2 and 3. It is expected that the site will achieve safety through the sequential allocation of development types and appropriate flood resilience measures. At this stage, flood risk and sustainable drainage measures have not been fully realised.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is adjacent to a main river, and so consideration to adequately mitigate against adverse impacts on water quality as a result of the development is key to the delivery of the site.
IIA14: Air Quality	+/-	M	D/I	L	R/I	P/T	ST/LT	Air quality at the site is good with low levels of NO ₂ and PM ₁₀ . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are high. Development specific climate resilience measures are not known at this stage. The addition of GI will help to alleviate the UHI effect, but more specific climate resilient design measures are not known at this time.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	++	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing and mixed-use development which will help to make the best use of the site.

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater</p> <p>IIA1/2: If construction of this site and the other allocated sites at Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites.</p> <p>IIA14: If construction of this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces. Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15/16: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Hepscott Road

Table G-19 – Hepscott Road

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	M	D	R	I	P	LT	The site is anticipated to provide up to 525 new homes, of which 35% will be affordable, this is key for the area as it falls within the 30-50% most deprived. The site has fair access to some community services which will help to bring communities together and support a changing demographic. The site will also include additional community and cultural facilities and may be potentially suitable for extra-care accommodation.
I/A2: Human Health	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health. Health deprivation is currently high, and the life expectancy for men is worse than the national average. The site will comprise of mixed-use development opportunities, supports urban greening through the provision of canal-side open space, and encourages improvements to the public realm. Community uses will also be included within the development site to meet the needs of the additional population. Overall, the site is expected to reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. The site will promote active travel through the provision of new walking and cycling routes by and providing connection to the Hertford Union Canal towpath, Roach Point Bridge, and Hackney Wick Station. It will ensure that the needs of all groups will be met both now and in the future.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site will include active uses through the formation of active frontage and non-residential ground floor frontage, prioritising mixed use development with residential properties above ground floor level, improving connectivity between business clusters. New shopfront openings and public realm improvements at the ground floor level. The site will prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The Site is located within close proximity to the Hackney Wick Neighbourhood Centre. The site will serve a range of business needs providing employment, creative and cultural uses.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The site will include employment space, supporting further job opportunities in the area. The site is expected to provide a range of employment, creative and cultural uses, meeting the needs for businesses and diversifying the labour market. The Site is outside the Activity Area, and so will improve employment opportunities within the locality. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	++	H	D	L	I	P	LT	The provision of approximately 525 new homes will help towards meeting LBTH and LLDC's housing target. At least 35% of all units will be affordable. It is expected that the size, type and tenure of housing takes into account different groups in the community, including but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	M	D	L	R/I	P/T	LT	The site is located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The Site will include a range of uses and will improve public realm including active uses at ground floor level, which will improve overall natural surveillance, particularly considering the existing waste management use of the site. It is expected that the development of the site would improve the perception of safety within the area compared to the existing nature of the site as a waste management facility. Improvements to connections for public foot and cycle traffic through the site are also expected to improve the security of the area
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is in a fairly sustainable location, located in close proximity to Hackney Wick Railway Station, a number of bus stops. The site is not connected to the London Cycle Network and is not in close proximity to EV charging infrastructure. This is reflected in a PTAL score between 2-3. The site includes the development of new walking and cycle routes providing connections to the Hertford Union Canal towpath, Roach Point Bridge and Hackney Wick Station.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel, the additional services to be provided on site is expected to sufficiently serve the new population of the area.
IIA9: Biodiversity & Natural Capital	++	M	D	L	I	P	LT	Areas of deciduous woodland are located <0.8km from the Site. The site is also located in close proximity to a number of SINC. There are no other statutory or non-statutory designated sites of nature conservation interest within or adjacent to the development site. A canal is located to the South of the Site. The development site mainly comprises of previously developed brownfield land, with most areas limited in vegetative cover. It is expected that there will be a minor adverse impact on ecology during construction. The site will include a linear park alongside the canal which will improve GI corridors and enhance the biodiversity of the site, which outweighs harm during the construction phase.
IIA10: Landscape & Townscape	+/-	M	D/I	L	I	P	LT	The site is located adjacent to MOL to the South and designated Open Space to the West. The site is expected to respond positively to the waterfront setting, enhancing the character of the canal and enhance strategic views west towards central London, and aims to achieve high quality public realm improvements.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Fish Island Conservation Area and the Lea Valley Archaeological Priority Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. It is anticipated that the development will make use of to ensure the retention and reuse of buildings of heritage value, and how development should preserve and enhance the conservation area, and where outside, enhance its setting.

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A12: Flooding	-	H	D	L	I	P	LT	The site is located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
I/A13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to Hertford Union Canal. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff.
I/A14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements will also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption to the local residents.
I/A15: Climate Change & Resilience	+	M	D/I	L	I	P	LT	Overall climate risk and overall heat risk are both high. Climate resilience measures are expected to reduce impacts of overheating risk and GI is a key element of the scheme to be delivered which should reduce the impacts of the UHI Effect. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
I/A16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
I/A17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
I/A18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater</p> <p>IIA1/2: If construction of this site and the other allocated sites at Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites.</p> <p>IIA14: If construction of this site and the Neptune Wharf Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 10% accessible homes. A range of housing options to suit all housing needs within the community is necessary in line with policies HF1 and HF2.</p> <p>IIA1/2: Further assessment of part of scheme level design should incorporate an evaluation of the provision of healthcare to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3: Where the site is located adjacent to a designated town centre, policies TC1-TC8 will ensure that development outside of the town centre will not detrimentally impact on the existing town centre, allowing centres to remain vibrant and sustainable and demonstrating vitality.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Sustainable Transport should be delivered as part of the development, in line with the requirements of policies MC1 and MC2.</p> <p>IIA9: In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA12: Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p>IIA13: Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon</p>							

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-20 – Sweetwater

Site Name	Sweetwater							
Site Capacity	775							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide up to 775 residential properties. The area is located within the 30-50% most deprived neighbourhoods, and 30% of the housing proposed will be affordable. A range of sizes of unit are proposed to meet housing requirements for all. At least 10% of each tenure type are designed to be wheelchair user dwellings and located where there is suitable access for parking. Access to services and facilities is generally good, and the site will be served by a nursery, library and associated community uses which will help to bring communities together and supporting the changes demographics of the area. The site will also be supported by public realm.
IIA2: Human Health	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health, including significant areas of parks and open spaces. Health deprivation is currently high, and the life expectancy for men is worse than the national average. The site will comprise of mixed-use development opportunities and supports urban greening through the provision of a canal-side walk, which will improve public realm and provide safe spaces for walking and cycling, and the provision of play spaces. A new NHS healthcare facility will also be provided. Other community facilities include a library and community centre and a nursery and outdoor play spaces. Overall, the site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The site lies in an out-of-centre location, with Hackney Wick Neighbourhood Centre being the closest to the site. The site will deliver non-residential floorspace so that the needs of residents are responded to and provide a mixture of uses to establish its own neighbourhood centre which will complement the wider Hackney Wick Area and introduce its own neighbourhood parade into the locality. The site will include active uses through the formation of active frontage and non-residential ground floor frontage, prioritising mixed use development with residential properties above ground floor level, improving connectivity between business clusters.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The site is within the 10-20% most deprived in terms of income, and the 30-50% most deprived in terms of employment. The site will include employment and commercial floor space, supporting further job opportunities in the area. The Site is outside the Activity Area and other industrial locations and so will improve and generate local employment opportunities. Ground floor uses will create its own neighbourhood centre, in an area where there are currently no neighbourhood parades within close vicinity to the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Sweetwater							
Site Capacity	775							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 775 new homes will help towards meeting LBTH and LLDCs housing targets. The site is within the 10-20% most deprived in relation to barriers to housing. At least 30% of all units will be affordable. 10% of residential units will be accessible homes. The site will include housing units in a range of sizes to suit all members of the community.
IIA6: Crime & Safety	+	M	D/I	L	R/I	P/T	ST/LT	The site is located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The site will include a range of uses and will improve public realm including active uses at ground floor level, which will improve overall natural surveillance. It is assumed the site has been designed in mind with measures to design out crime, and so the development will inherently improve the perception of safety within the area. Improvements to connections for public foot and cycle traffic through the site are also expected to improve the security of the area.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site is in a fairly sustainable location and is located in close proximity to Hackney Wick Railway Station, Pudding Mill Lane and Stratford International DLR stations, as well as a number of bus stops. The site connected to the London Cycle Network. There is little EV charging infrastructure at the site. This is reflected in a PTAL score between 2-3. The site will include 20% EV charging when operational. Also, walking and cycling routes are proposed, as well as secure cycle parking. The site is also proposed to deliver a pattern of land use which prioritises walking and cycling and facilitates short trips.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The level of additional services provided on-site will deliver a pattern of land use which prioritises walking and cycling and reduces the need to travel. Accessible parking bays will be provided for wheelchair accessible dwellings for 3% of accessible dwellings for up to an additional 7%.
IIA9: Biodiversity & Natural Capital	+/-	H	D	R	I	P	LT	There are no statutory or non-statutory designated sites within the site, an area of prior habitat deciduous woodland is located to the south of the site. The site is also located in close proximity to a number of SINCS. The site is expected to deliver an integrated approach to open space, biodiversity and the natural environment through the provision of GI. It is expected that during construction there will be an adverse impact on ecology. It is assumed that BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) will be delivered through the development of the Canal Park, the proposed liveable streets, and green roofs.
IIA10: Landscape & Townscape	++	M	D	L	R/I	P/T	ST/LT	Local Open Space within the site will be maintained, and a larger provision of open and amenity spaces will also be provided through the approved landscaping plan, integrating new green development into the existing surrounding context. The site will have an overall positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area. Active frontage would be created along the canal, and green landscapes areas will be maintained to set development back from the river frontage to maintain the character of the canal side.

Site Name	Sweetwater							
Site Capacity	775							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+	M	I	L	R/I	P/T	ST/LT	The site lies within close proximity to the Fish Island, Hackney Wick, and White Post Lane Conservation Areas and is situated within the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets, which must be mitigated against. The site will lead to the enhancement of existing views and greening which will have a positive impact on heritage assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a main river, and so consideration to adequately mitigate against adverse impacts on water quality as a result of the development is key to the delivery of the site.
IIA14: Air Quality	+/-	M	D	L	I	T	ST	Air quality is generally good at the site. The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions. Residential properties will be set back and separated from main vehicle circulation routes by street trees to reduce impact on the local community.
IIA15: Climate Change & Resilience	+	H	D	L	I	P	LT	The site is identified as being at high heat and climate risk. The addition of more GI and open space will help to reduce the UHI effect. It is expected that homes and non-residential units will be constructed to energy efficient standards and will make use of renewable energy. It is assumed sustainable construction practices will be used. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is uncertain if the development will include renewable energy sources.
IIA17: Waste	+	M	D	L	I	P/T	ST	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site The site will encourage sustainable use of materials through the use of recycled aggregated and materials
IIA18: Efficient use of Land	++	M	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. The site will encourage sustainable use of materials through the use of recycled aggregated and materials

Site Name	Sweetwater							
Site Capacity	775							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites at Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf, as well as other East Wick and Sweetwater development phases outside of the borough.</p> <p>IIA1/2: If construction of this site and the other allocated sites at Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf and other phases of the East Wick and Sweetwater development were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and other East Wick and Sweetwater phases, and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites, as well as other East Wick and Sweetwater development phases outside of the borough, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increases in the loss of heritage assets and buried archelogy from both this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites as well as other East Wick and Sweetwater development phases outside of the borough.</p> <p>IIA14: If construction of this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf and other East Wick and Sweetwater phases of development were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites as well as other East Wick and Sweetwater development phases outside of the borough is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate, Neptune Wharf sites and other East Wick and Sweetwater phases are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces. Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA13: The application of policy CG6, CG7 and CG8 will help to preserve water quality and mitigate impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15/16: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-21 – Teviot Estate

Site Name		Teviot Estate						
Site Capacity		1200						
Site Source		New allocation						
Site Status		New allocation						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 1,200 new residential units, which will work positively towards achieving the borough's housing target. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site aims to provide additional facilities, including community and faith facilities, as well as a new primary school. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
I/A2: Human Health	++	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. As well as housing, the site includes community and faith facilities, and supports urban greening through provision improvements to parks and open spaces at Langdon Park and Uamvar Street, as well as encouraging improvements to the public realm. The site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. The site will reduce levels of health inequalities and provide new facilities which will improve wellbeing and reduce levels of loneliness. The development of new primary school provision, including playing fields and sports facilities is likely to improve the health and wellbeing of children around the site and Leaside area, providing play and educational facilities.
I/A3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is near Empson Street SIL, one of London's main reservoirs of industrial and related capacity, and is adjacent to Barratt Industrial Estate, a Locally Significant Industrial Site. The site will aim to cluster of local retail and community uses could be reprovided along Zetland Street from the current location on Teviot Street, which may provide some additional employment opportunities, however, these are unlikely to be significant.
I/A4: Employment & Skills	+	L	D	R	I	P	LT	The site is well located close to Empson Street SIL, <1 km from Canary Wharf Major Centre, and the Isle of Dogs Activity Area, providing opportunities for access to employment. However, it is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	+	H	D	R	I	P	LT	The provision of 1200 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.
I/A6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and

Site Name	Teviot Estate							
Site Capacity	1200							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	?	N/A	N/A	N/A	N/A	N/A	N/A	Some access is available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 2 and 4. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision, however improved infrastructure is a proposed feature of the scheme.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on site and the current capacity of these facilities. There is potential for essential services to be stretched by a population increases. This may conversely increase the need to travel. Details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is adjacent to the River Thames and Tidal Tributaries SINCS and adjacent to areas of priority habitat including mudflat. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. Some new green spaces and play parks will be provided, but this will be small scale and at this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	+	M	D	L	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. There are proposals to create new green and play spaces which will deliver enhancements to the character and appearance of the surrounding area.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, partially within the Langdon Park Conservation Area, and adjacent to the Limehouse Cut Conservation Area. It is therefore anticipated that the built form will protect and enhance the setting of heritage assets. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets
IIA12: Flooding	--	H	D	L	I	P	LT	The site is partially located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. The site gives no detail as to how it intends to manage the flood risk of the area, however any measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the Limehouse Cut. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts.

Site Name	Teviot Estate							
Site Capacity	1200							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are high. Development specific climate resilience measures are not known at this stage. The addition of GI will help to alleviate the UHI effect, but more specific climate resilient design measures are not known at this time.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Ailsa Street, Aberfeldy Estate and Chrisp Street. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archology from both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site is likely to result in a significant cumulative increase in embodied</p>							

Site Name	Teviot Estate							
Site Capacity	1200							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Ailsa Street, Aberfeldy Estate and Chrisp Street is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential. Buildings within the London City Airport Aerodrome Safeguarded zone need adhere to stipulated height restrictions.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-22 – Aspen Way

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	I	P	LT	The site will provide 780 new residential units, which will work positively towards achieving the borough's housing target. However, it is not known whether there will be provision made for wheelchair adaptable homes. It is assumed that the site will meet the minimum 35% target of affordable homes. The site is within the 20-30% most deprived Lower Super Output Areas (LSOAs) in the borough so affordability should be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will also include additional community facilities, including sports, cultural and a college. Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD, which aims to address the social, economic and environmental disparities between Poplar and Canary Wharf.
IIA2: Human Health	+	M	D		I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and is directly adjacent to Poplar Recreation Ground, however, health deprivation is high and life expectancy is worse than the national average for males and females. It is not clear whether the current healthcare provision will meet the needs of the new population. However, the additional provision of community facilities, college and football pitches will contribute to improving the public realm and community facilities around the site. Additionally, reprovisioning the football pitches will encourage physical activity and improve health, particularly amongst children and young people.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The finer details of the development are not yet known; however the site is allocated for mixed use development and compatible commercial uses, which will include SME and retention of the existing Docklands Light Railway (DLR) depot. The site will improve and enhance connectivity between business clusters and the housing market.
IIA4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to existing employment areas, within the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. The proposal of mixed-use development to include commercial uses will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 780 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions. The addition of sustainable transport provision could reduce the number of vehicles on the borough's roads, thus supporting road safety measures to reduce the numbers of victims killed and seriously injured (KSI) on roads.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail, with Poplar DLR station within the site. It is uncertain if there are plans for additional transport provision. This is reflected by the site having a PTAL scores ranging between 3 and 5. However, the site includes improved walking and cycling connections to the surrounding area, including: Poplar DLR station, Poplar High Street, East India Dock Road and Canary Wharf Station. There are also proposed improvements to the pedestrian crossing over Aspen Way as part of the development.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. Active travel is encouraged with direct access to the National Cycle Network. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	+	L	D	L	R	P	MT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. The provision of strategic open space along with a public square green grid improvement, will help to increase biodiversity and natural capital on site.
IIA10: Landscape & Townscape	++	H	D	R	R/I	P/T	ST/LT	The current landscape/ townscape is of a low quality. The proposed site aims to create a positive sense of place with a public square and public green open space that integrates north-south links and Poplar DLR station and improve the quality of spaces around and between buildings and movement through the area.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is partially located within both Poplar and Isle of Dogs APA, and partially within St Matthias' Church Conservation Area. It is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II New City College within the site, as well as multiple adjacent listed buildings. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a Flood Risk Area. The site is low lying and therefore has a greater probability of flooding. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								water and enable discharge into the docks to the south. However, no details are understood relating to the specific measures this will include, or any additional flood risk mitigation.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has substandard air quality but provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk is medium and overall heat risk is high. Development specific climate resilience measures are not known at this stage, but the incorporation of green spaces and GI will help to reduce the UHI effect. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site North Quay and Billingsgate Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the North Quay and Billingsgate Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the North Quay and Billingsgate Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p>							

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the North Quay and Billingsgate Market site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the North Quay and Billingsgate Market site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the North Quay and Billingsgate Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site North Quay and Billingsgate Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the World Heritage Site Management Plans is essential.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Billingsgate Market

Table G-23 – Billingsgate Market

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	L	I	P	LT	<p>The site has potential to provide approximately 3000 homes, which will work positively towards achieving the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known. It is also not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.</p> <p>Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD, which aims to address the social, economic and environmental disparities between Poplar and Canary Wharf.</p>
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, including sports facilities. It is not clear whether the current provision will meet the needs of the new population. There is limited information on the level of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, it is expected the scheme will deliver open space, a community centre and retail complexes which will help to promote active and healthy lifestyles.</p>
IIA3: Economy & Town Centres	+/-	M	D	L	I	P	LT	<p>The site will prioritise mixed use development, and there is an allowance for employment on-site, including strategic office space with supporting uses such as gyms, hotels, restaurants and retail, along with compatible commercial uses, including SME, as well as industrial floorspace. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is adjacent to Canary Wharf Major Centre, and so it is imperative that development does not impact on the function of this retail centre. As part of the development, relocation of the wholesale market is required, the UK's largest inland fish market. Therefore, re-provision must be suitable to ensure it continues its legacy.</p>
IIA4: Employment & Skills	+	M	D	L	I	P	LT	<p>The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 3000 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, overground, underground and rail, with multiple Docklands Light Railway (DLR) stations nearby. The site has a PTAL score of between 4 and 5. Active travel is also encouraged via the London Cycle Network. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to transport, facilities and services. The development has aspiration for pedestrian and cycling priority access along a new dockside promenade, further facilitating active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	-	M	D	L	R	T	ST	The site is located adjacent to areas of mudflat priority habitat, along with a few SINCs, including Millwall and West India Docks SINC, Blackwall Basin SINC, and Poplar Dock SINC. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to Local Open Space and is within the Tall Building Zone and the Canary Wharf Strategically Important Skyline. It is currently uncertain if development of the site will provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown, this is likely to be determined by individual design. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II accumulator tower on the west side of Poplar Dock, within the site. Design principles will need to protect or enhance the accumulator tower. Coldharbour Conservation Area and the safeguarded Northumberland Wharf are located near to the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	-	H	D	L	I	P	LT	The site is predominantly located within Flood Zone 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface water and enable discharge into the docks to the south.
IIA13: Water Quality	-	H	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. The management of surface water and the enablement of discharge into the docks to the south of the site, may also impact on water quality. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	M	D	L	I	P	LT	Overall climate and heat risk is medium-high. Climate resilience measures such as GI, SuDs etc are not known at this stage. Measures to reduce the risk of overheating will need to be considered. The incorporation of accessible open space and GI may help to reduce the UHI effect.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Aspen Way and North Quay. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Aspen Way and North Quay site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Aspen Way and North Quay site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Aspen Way and North Quay site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Aspen Way and North Quay site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Aspen Way and North Quay site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Aspen Way and North Quay is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p>							

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-24 – Crossharbour

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site has potential to provide approximately 2500 homes. However, at this stage, it is not known how many of these units will be affordable and wheelchair adaptable. The site has good existing access to most community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including educational provision, health and community facilities.
IIA2: Human Health	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high. The site will deliver new community facilities and NHS services and so it is expected that improvements to health and wellbeing will be delivered. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The Crossharbour site is defined as a primary shopping area. The development is expected to create a new town centre with provision for a variety of retail, leisure and community uses. The inclusion of ground floor active uses will support town centre viability and changing retail patterns, integration with residential development will improve and enhance connectivity between business clusters and the housing market.
IIA4: Employment & Skills	+	M	D/I	L	I	P	LT	The site will include retail space, as well as other leisure and community uses which is considered to provide employment opportunities. It is anticipated that other comparable uses may come forward which could include other employment spaces. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 2500 new homes will help towards meeting LBTH's housing target. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
IIA6: Crime & Safety	+	L	D/I	L	I	P	LT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network. There is poor access to the underground at the site. This is reflected in the site having a PTAL level of between 2-4. The site is expected to improve walking and cycling connections, and the provision of a bus interchange which will support new sustainable transport options for future population growth. The site is well located to local facilities and services which will allow residents to live their lives more locally.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D/I	L	R/I	P/T	MT/LT	The site is adjacent to deciduous woodland and borders the Mudchute Park Farm Local Nature Reserve. The site is also located in close proximity to a number of SINCS, with Mudchute Farm and Park SINC located on the border of the site. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI; however, it is unknown whether the site will be in line with BNG targets.
IIA10: Landscape & Townscape	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is adjacent to an area of Local Open Green Space (Mudchute Farm and Millwall Park), the site is also situated in the Millwall Inner Dock Cluster Tall Buildings Zone. It is therefore expected that the development of the site will respond to the existing character of the surrounding built environment, taking into particular consideration the massing of the surrounding area. The site will incorporate GI as part of the design including the increase in public realm and public open spaces.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. Consideration should be given to ensure there is no impact on the setting of the historic docks and Maritime Greenwich World Heritage Site to the South, and the adjacent listed building, the Carnegie Library. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site has fairly good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, specific climate resilience design measures are unknown, but the inclusion of GI may help to alleviate the UHI effect
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational however it is expected that the development could demonstrate potential to connect to the Barkantine Energy Centre. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Samuda Estate and Limeharbour.</p> <p>IIA1/2: If construction of this site and the Samuda Estate and Limeharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Samuda Estate and Limeharbour sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Samuda Estate and Limeharbour sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape in combination with neighbouring sites Samuda Estate and Limeharbour.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archaeology from both this site and the Samuda Estate and Limeharbour site.</p> <p>IIA14: If construction of this site and the Samuda Estate and Limeharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Samuda Estate and Limeharbour sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Samuda Estate and Limeharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Samuda Estate and Limeharbour sites are likely to result in a cumulative increase in waste.</p>							

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-25 – Limeharbour

Site Name	Limeharbour							
Site Capacity	1900							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped-pending decision)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	L	I	P	LT	The site has potential to provide approximately 1900 homes. The number of affordable homes for the entire site is not currently realised. It is expected that 35% affordable housing could be provided. 10% of units will be designed to be wheelchair accessible. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. At this location, issues of overcrowding are higher than the borough average and so it is important to ensure that the provision of services will help to support the changing demographic.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, the site is within the 30-50% most deprived in terms of health. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
IIA3: Economy & Town Centres	+/-	M	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is adjacent to the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre.
IIA4: Employment & Skills	++	M	D	L	I	P	LT	Limehouse is well located to existing employment areas including the Isle of Dogs Activity Zone. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has capacity to provide approximately 1900 homes, which will provide a net increase in the number of dwellings within the borough. The number of affordable homes for the entire site is not currently realised. It is expected that 35% affordable housing could be provided. 10% of units will be designed to be wheelchair accessible. The size, type and tenure of housing will need to take into account different groups in the community, and it is

Site Name	Limeharbour							
Site Capacity	1900							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped-pending decision)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								expected that the site will maximise the provision of family homes. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
IIA6: Crime & Safety	+	L	D/I	L	I	P	LT	Currently, the site scores within the 30-50% most deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has average access to public transport, as reflected in a PTAL score between 3-4, the site is situated within reasonable proximity to bus stops and underground and overground stations. Improvements to cycling and walking connections to, from and within the site are assumed including to the wider area's employment and amenity spaces. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
IIA8: Accessibility	+	L	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to the legibility of the site will improve the accessibility of the site. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	MT/LT	The Mudchute Park Farm Local Nature Reserve is located approximately 0.5km to the south of the site, and mud flat priority habitats are located to the east. There are also a number of SINCs located within close proximity of the site. There is a potential for a negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI.
IIA10: Landscape & Townscape	+/-	M	D/I	L	R/I	P/T	ST/LT	The Canary Wharf Area Strategically Important Skyline is situated to the North of the site, and the site itself is within the boundaries of the Millwall Inner Dock Cluster Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

Site Name	Limeharbour							
Site Capacity	1900							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped-pending decision)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the historic docks and the setting of the Maritime Greenwich World Heritage Site to the South. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, however, levels of NO ₂ are >28-43µ/m ³ . The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. Measures are expected to be implemented in the design of buildings to minimise the effects of heating and cooling including a range of planting to improve the GI provision.
IIA16: GHG Emissions	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that the development could connect to the Barkantine Energy Centre. Energy demand is also expected to be met by using air source heat pumps and a centralised distribution network. Passive design features are expected to improve energy efficiency.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	Limeharbour							
Site Capacity	1900							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped-pending decision)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Samuda Estate and Crossharbour.</p> <p>IIA1/2: If construction of this site and the Samuda Estate and Crossharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Samuda Estate and Crossharbour sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Samuda Estate and Crossharbour sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape in combination with neighbouring sites Samuda Estate and Crossharbour.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Samuda Estate and Crossharbour site.</p> <p>IIA14: If construction of this site and the Samuda Estate and Crossharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Samuda Estate and Crossharbour sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Samuda Estate and Crossharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Samuda Estate and Crossharbour sites are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							



Marsh Wall East

Table G-26 – Marsh Wall East

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	L	I	P	LT	The site has potential to provide approximately 2400 homes, which will work positively towards achieving the borough's housing target. Of the 332 residential units currently permitted, 71 are affordable, and 10% will be wheelchair accessible. The site has existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide a small open space, primary school and health facility to meet the needs of groups now, but also the needs of the future population. The site will provide a new primary school and open space, to meet the needs of groups now and in the future.
IIA2: Human Health	++	M	D/I	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and it also expected to deliver further community services and facilities through the provision of new healthcare and new open spaces which will improve access to health services, as well as improve physical and mental health and wellbeing and reduce level of loneliness. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population. Additionally, the site will ensure that the eastern side of the site is suitably mitigated against potential noise from the data centre uses within this area, in line with the Agent of Change principle. This will reduce noise pollution and nuisance, therefore reducing mental stress and improving mental wellbeing.
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	The South Quay neighbourhood centre is located at the west of the site. The site also falls within the Isle of Dogs Activity Area, and so the provision of residential and employment space within the site is expected to improve and enhance the connectivity between business clusters and the housing market. The site also includes 10,500sqm of retail floorspace which will improve the local economy. However, it is imperative that any retail development does not detrimentally impact on the vitality of the designated retail centre.
IIA4: Employment & Skills	++	M	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. It is assumed that employment space will be delivered as part of the development of the site, and so will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	M	D	L	I	P	LT	The provision of 2400 new homes will help towards meeting LBTH's housing target. Of the 332 residential units currently permitted, 71 are affordable, and 10% will be wheelchair accessible. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
IIA6: Crime & Safety	+	L	D/I	L	I	P	LT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network, this is reflected in the site having a PTAL level of between 3-4. The site is expected to improve walking and cycling connections, and the provision of a bus interchange which will support new sustainable transport options for future population growth. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to cycle and pedestrian access are expected to be delivered as part of the site.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has access to some facilities and services and the proposal includes further provision for community facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	MT/LT	The site is within close proximity to a mudflat priority habitat and a number of SINCs. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, and it is anticipated that improvements will be made to biodiversity and ecology along the water's edge.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Tall Building Zone. Design will incorporate a variation in heights across the site, with heights generally stepping down towards the west of the site but to the east of the Millwall Cutting. Full details of the height of buildings and its impact on the Canary Wharf Area Strategically Important Skyline are currently unknown - this is likely to be determined by individual design. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. The site is also adjacent to the Coldharbour Conservation Area. Any development of the site will need to protect and enhance the setting of heritage assets, including the historic docks and the Maritime Greenwich World Heritage Site. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the Middle and South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. The site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. The development is expected to deliver external landscapes areas to improve GI networks. Buildings will be designed to ensure water efficiency and overheating are mitigated, thus improving overall climate resilience.
IIA16: GHG Emissions	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Passive design and energy efficiency measures are expected to reduce energy demand. Connections for future heat networks are expected to be delivered as part of the site's development. No renewable energy measures are expected to be included within the scheme's design.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites.</p> <p>IIA1/2: If construction of this site and the Limeharbour and Marsh Wall West sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Limeharbour and Marsh Wall West sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Limeharbour and Marsh Wall West sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape and the strategically important skyline in combination with neighbouring sites Limeharbour and Marsh Wall West.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Limeharbour and Marsh Wall West.</p> <p>IIA14: If construction of this site and the Limeharbour and Marsh Wall West sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Limeharbour and Marsh Wall West sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Limeharbour and Marsh Wall West sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Limeharbour and Marsh Wall West sites are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Marsh Wall West

Table G-27 – Marsh Wall West

Site Name	Marsh Wall West							
Site Capacity	2625 (+1000 student rooms + 800 co-living units)							
Site Source	Existing allocation							
Site Status	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	R	I	P	LT	The site will provide 2,625 new homes and has potential to provide at least 1000 new rooms for students and 800 co-living units, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable across the whole site. Given the inclusion of co-living and PBSA some development of the site will not contribute affordable housing. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. These units have the potential to benefit both students and the wider community, by delivering other priorities such as affordable housing. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.
IIA2: Human Health	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	+/-	M	D	L	I	P	LT	There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is partially located within the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
IIA4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf Major Centre and primary shopping areas. This will likely improve access for residents to employment opportunities. Employment space delivered as part of the development of the site will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	R	I	P	LT	The site has capacity to provide 2,625 homes, including 1000 student rooms and 800 co-living units which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable across the whole site. Given the inclusion of co-living and PBSA some development of the site will not contribute affordable housing. The inclusion of co-living units is assumed to

Site Name	Marsh Wall West							
Site Capacity	2625 (+1000 student rooms + 800 co-living units)							
Site Source	Existing allocation							
Site Status	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								provide more flexible housing and will contribute a range of housing options within the site. It is assumed the site will deliver a proportion of wheelchair adaptable homes.
IIA6: Crime & Safety	+/-	L	I	L	R	P	MT	The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 3 and 5. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	++	H	D	R	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R	T	ST	The site is adjacent to Millwall and West India Docks SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the inclusion of GI and public realm improvements, could help to provide small scale habitats.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Tall Building Zone. Design will incorporate a variation in heights across the site, with heights generally stepping down towards the west and south of the site. Full details of the height of buildings and its impact on the Canary Wharf Area Strategically Important Skyline are currently unknown - this is likely to be determined by individual design. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within Isle of Dogs Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
IIA12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.

Site Name	Marsh Wall West							
Site Capacity	2625 (+1000 student rooms + 800 co-living units)							
Site Source	Existing allocation							
Site Status	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA13: Water Quality	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+	H	D	R	I	P	LT	Overall climate risk is medium and overall heat risk is medium-high. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. Various SuDS, landscaping and design measures to limit overheating are expected to be delivered, which in turn will reduce vulnerability to the impacts of climate change.
IIA16: GHG Emissions	+	H	D	R	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development of the site is expected to maximise energy efficiency through a fabric first approach which will reduce energy demand.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed and brownfield land and will support the protection of the borough's green spaces. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marshwall East and Millharbour. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Marshwall East and Millharbour site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Marshwall East and Millharbour site will significantly increase housing stock, contributing to the borough's housing target, whilst</p>							

Site Name	Marsh Wall West								
Site Capacity	2625 (+1000 student rooms + 800 co-living units)								
Site Source	Existing allocation								
Site Status	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.								
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects	
	<p>tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Marshwall East and Millharbour site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Marshwall East and Millharbour site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Marshwall East and Millharbour site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Marshwall East and Millharbour is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>								
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>								

Table G-28 – Millharbour

Site Name	Millharbour							
Site Capacity	1700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 1,700 new residential units, which will work positively towards achieving the borough's housing target. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide a small open space, primary school and secondary school to ensure that the needs of all groups will be met both now and in the future.
IIA2: Human Health	+	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness.
IIA3: Economy & Town Centres	++	M	D	L	I	P	LT	There is an allowance for employment uses including office and retail space as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is partially located within the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
IIA4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf Major Centre and primary shopping areas. This will likely improve access for residents to employment opportunities. Employment space delivered as part of the development of the site will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+/-	H	D	R	I	P	LT	Housing prices in the ward far exceed the London average. The provision of 1,700 new homes will help towards meeting the borough's housing target. It is expected that 26.6% affordable housing will be delivered. It is expected that 10% of housing units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of moderate crime deprivation (predominantly the top 40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.

Site Name	Millharbour							
Site Capacity	1700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has average access to public transport via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 2 and 4. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R	T	ST	The site is adjacent to Millwall and West India Docks SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the inclusion of GI and public realm improvements, could help to provide small scale habitats
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site lies predominantly within the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within Isle of Dogs Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
IIA12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.
IIA13: Water Quality	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative

Site Name	Millharbour							
Site Capacity	1700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are medium-high. The site is expected to include public realm improvements and additional GI, which could help to alleviate the UHI effect. Currently, specific climate resilience design measures are unknown.
IIA16: GHG Emissions	+	H	D	L	I	P	T	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. A range of passive design measures are expected to reduce energy demand. A site wide district heating network is expected to be delivered.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed and brownfield land and will support the protection of the borough's green spaces. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marshwall West and Marshwall East. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Marshwall West and Marshwall East site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Marshwall West and Marshwall East site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Marshwall West and Marshwall East site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Marshwall West and Marshwall East site is likely to increase resilience to the UHI</p>							

Site Name	Millharbour							
Site Capacity	1700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Marshwall West and Marshwall East site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Marshwall West and Marshwall East is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the World Heritage Site Management Plans is essential.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-29 – North Quay

Site Name		North Quay						
Site Capacity		1250						
Site Source		Existing allocation						
Site Status		Consented						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	+	H	D	R	I	P	LT	The site has capacity to provide 1250 homes, which will work positively towards achieving the borough's housing target. It is expected that the site will provide 30% affordable housing, however this falls below the target set in policy. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
I/A2: Human Health	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, no new health facilities are proposed. The development of the site will include open spaces and improvements to public realm, which is expected to improve physical and mental health and wellbeing and reduce levels of loneliness.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The site borders the Isle of Dogs Activity Area, and so it is expected that key employment opportunities are available for future residents and will improve and enhance connectivity between business clusters and the housing market. It is expected that development will also deliver gyms, hotels and restaurants to expand the provision of different markets. The site is well located to local retail centres, including the Westferry/Pennyfields neighbourhood parade and the Canary Wharf primary shopping area, and so development is likely to improve footfall to these areas. However, it is imperative that any retail provision within the site does not impact on the vitality of local high streets.
I/A4: Employment & Skills	++	H	D	L	I	P	LT	Employment and income deprivation is low in the area, as reflected in the proximity to the Isle of Dogs Activity Area. The development of the site is expected to provide additional employment space through the delivery of mixed-use development and extend the existing good access to jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	+	H	D	L	I	P	LT	The site has capacity to provide 1250 new homes. The site is amongst the most deprived in terms of barriers to housing, and house prices. It is expected that the site will provide 30% affordable housing, however this falls below the target set in policy HF2. The site is expected to deliver 10% accessible homes within the affordable rented tenure and 10% within the immediate sector.
I/A6: Crime & Safety	++	L	D/I	L	I	P	LT	The site is expected to deliver improvements to public realm, including the provision of open spaces, and the creation of a green grid. Active frontages are also expected to be a key feature of the site which will improve natural surveillance within the site and in turn improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles.

Site Name	North Quay							
Site Capacity	1250							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site has average to good access to public transport, as reflected in a PTAL score between 4-5, and is situated within good proximity to bus stops and underground and overground stations. Improvements are expected to include a pedestrian route and enhancement of the Aspen Way pedestrian bridge to connect to the wider movement network and the DLR and underground stations adjoining the site are expected to promote the use of existing public transport provision. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to facilities and services. Improvements to pedestrian routes within the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R/I	P/T	MT/LT	The site is located less than 0.8km from an area of mudflat priority habitats. The site is adjacent to the Millwall and West India Docks SINC. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI; however, it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site lies within the Canary Wharf Area Strategically Important Skyline, and within the Tall Building Zone. It is currently uncertain if development of the site will provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown, this is likely to be determined by individual design. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is located adjacent to the West India Dock Conservation Area, and the quay walls to the dock to the south of the site are Grade I listed. The site also falls within the Isle of Dogs Archaeological Priority Area. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is predominantly located within Flood Zone 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface water and enable discharge into the docks to the south.

Site Name	North Quay							
Site Capacity	1250							
Site Source	Existing allocation							
Site Status	Consented							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A13: Water Quality	-	H	D	L	R/I	P/T	ST/LT	The site is located in close proximity to North Dock. There is potential for increased surface runoff during construction, further polluting this watercourse. The management of surface water and the enablement of discharge into the docks to the south of the site, may also impact on water quality. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
I/A14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements will also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption.
I/A15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, full climate resilience measures are unknown. The addition of more GI and open space will help to reduce the UHI effect. SuDS and rainwater harvesting is expected to be integrated into buildings and the public realm.
I/A16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that measures to improve energy efficiency of buildings will be included, as well as the use of renewable energy technologies will be delivered at the site.
I/A17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
I/A18: Efficient use of Land	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	North Quay							
Site Capacity	1250							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Aspen Way and Billingsgate Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Aspen Way and Billingsgate Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Aspen Way and Billingsgate Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archaeology from both this site and the Aspen Way and Billingsgate Market site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA16: The construction of both this site and the Aspen Way and Billingsgate Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Aspen Way and Billingsgate Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-30 – Reuters

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site has capacity to provide 900 homes, which will work positively towards achieving the borough's housing target. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site is located within an area of high population density (>15,695p/h). However, the site also includes space for additional community facilities, including a primary school and nursery.
IIA2: Human Health	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, no new health facilities are proposed. The development of the site will include landscaping and improvements to public realm, which is expected to improve physical and mental health and wellbeing and reduce levels of loneliness.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site includes mixed use development, including commercial, business, communal and public house spaces. The site will improve and enhance connectivity between business clusters and the housing market. The site is also well located close to existing town centres and economic hubs.
IIA4: Employment & Skills	+	M	D	R	I	P	LT	The site is located 500m from the existing employment area of the Isle of Dogs Activity Area and a locally significant industrial site. The site also includes space for additional employment space. The construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	L	I	P	LT	The site has capacity to provide 900 new homes. The site is amongst the most deprived in terms of barriers to housing, and house prices. It is expected that the site will provide 30% affordable housing, however this falls below the target set in Policy HF2. However, the site includes a range of housing type and tenures. It is assumed the site will deliver a proportion of accessible homes.
IIA6: Crime & Safety	+/-	M	D/I	L	I	P	LT	The site is expected to deliver improvements to public realm, including the provision of open spaces, and the creation of a green grid. Active frontages are also expected to be a key feature of the site which will improve natural surveillance within the site and in turn improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles. However, the inclusion of a public house space at the site has the potential to result in increases in anti-social behaviour, particularly during night time hours. There is also the potential for this use to increase the fear of crime in the local community.
IIA7: Sustainable Transport	++	H	D	L	I	P	LT	The site has average access to public transport, as reflected in a PTAL score of 3, and is situated within good proximity to bus stops and underground and overground stations. Improvements are expected to include walking and cycling connections to connect to the

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								wider network. Development at the site will also be accompanied by the delivery of a new riverbus station. This will improve access to the site and surrounding area. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to facilities and services. Improvements to pedestrian routes within the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D	L	R	P	MT	The site is adjacent to the River Thames and Tidal Tributaries SINC and in close proximity to the Saffron Avenue Pond SINC. The site also borders an area of priority habitat for mudflats. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site has potential to contribute to biodiversity along within landscaping and open spaces, which could help to provide new small-scale habitats.
IIA10: Landscape & Townscape	+/-	M	D/I	L	I	P	LT	The site is located within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. There are also two areas of open space located in close proximity to the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Blackwall APA. There are also a small number of heritage assets located around the site. The Naval Row conservation area is also located 80m north of the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	-	H	D	L	I	P	LT	The site is located within an area of Flood Zone 3 and a flood risk zone and is directly adjacent to the River Thames. The site is low lying and therefore has a greater probability of flooding. However, development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse.

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area of medium high overall climate risk and medium heat risk rating. The site is also located within an area of flood zone 3 and has a diminishing resilience to climate change. Design measures have been incorporated to mitigate impacts of overheating. Green and blue infrastructure is expected to be delivered across the site. At this stage, it is understood that SuDS will be incorporated, however final details are yet to be confirmed. At this stage, climate resilience measures are unknown.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The site is located on brownfield land. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the Republic Estate site.</p> <p>IIA1/2: If construction of this site and the Republic Estate site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Republic Estate site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Republic Estate site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Republic Estate site.</p> <p>IIA14: If construction of this site and the Republic Estate site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and surrounding sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Republic Estate site are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and the neighbouring site Republic Estate site are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12/13: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-31 – Riverside South

Site Name	Riverside South							
Site Capacity	1650							
Site Source	Existing allocation							
Site Status	Consented for office development, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	R	I	P	LT	The site has potential to provide approximately 1,650 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site is situated in a least deprived area (10-20%) and has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
IIA2: Human Health	+	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is moderate with the site being situated in the top 30-50% of most deprived neighbourhoods nationally. There is limited information on the level of additional community infrastructure. However, it is expected the scheme will deliver a new community centre and retail complexes which will promote active and healthy lifestyles.
IIA3: Economy & Town Centres	+	H	D	R	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area and Canary Warf Major Centre. This will likely improve access for residents to employment opportunities. There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	Riverside South is well located to existing employment areas including the Isle of Dogs Activity Zone. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has capacity to provide approximately 1,650 homes, which will provide a net increase in the number of dwellings within the borough. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, and it is expected that the site will maximise the provision of family homes. It is important that affordability is taken into account, particularly considering the significant barriers to housing (10-20% most deprived with house prices exceeding London Average) within the locality.

Site Name	Riverside South							
Site Capacity	1650							
Site Source	Existing allocation							
Site Status	Consented for office development, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	D/I	L	R/I	P/T	LT	Currently, the site sits within the 10-20% least deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community. Additionally, the development will provide appropriate riparian lifesaving infrastructure along the riverside path, improving user safety.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site has good access to public transport, as reflected in a PTAL score of 5, the site is situated within reasonable proximity to bus stops, underground and overground stations, as well as the national and London cycle networks. Improvements to cycling and walking connections to, from and within the site are expected including to the wider area's employment and amenity spaces. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
IIA8: Accessibility	++	L	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to the legibility of the site will improve the accessibility of the site. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the southwest of the site so there is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. Full details of the scale of buildings are currently unknown, this is likely to be determined by individual design. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II Historic Lock south of the site, the Grade II listed building also south of the site and a Grade II listed gate North-East of the site. Two conservation areas are located within 0.4km North of the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.

Site Name	Riverside South							
Site Capacity	1650							
Site Source	Existing allocation							
Site Status	Consented for office development, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA12: Flooding	-	H	D	L	I	P	LT	The site is located within an area of Flood Zone 3 and a flood risk zone and is directly adjacent to the River Thames. The site is low lying and therefore has a greater probability of flooding. However, development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a low-medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. At this stage, specific climate resilience design measures are unknown.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	Riverside South							
Site Capacity	1650							
Site Source	Existing allocation							
Site Status	Consented for office development, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Westferry and Park Place and 10 Bank Street as well as other developments within Canary Warf</p> <p>IIA1/2: If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Westferry and Park Place and 10 Bank Street sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Westferry and Park Place and 10 Bank Street sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring sites Westferry and Park Place and 10 Bank Street.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Westferry and Park Place.</p> <p>IIA14: If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Westferry and Park Place and 10 Bank Street sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Westferry and Park Place and 10 Bank Street sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Westferry and Park Place and 10 Bank Street sites are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							



Westferry Printworks

Table G-32 – Westferry Printworks

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	L	I	P	LT	The site has potential to provide approximately 950 homes. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide open space and additional educational infrastructure through a secondary school.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver open space which will promote active and healthy lifestyles and reduce social isolation.
IIA3: Economy & Town Centres	+	M	D	R	I	P	LT	The site is within the most deprived in terms of income. The site is expected to deliver mixed use development including a range of employment spaces to meet the needs of various sizes of businesses. The site is also situated in close proximity to the Isle of Dogs Activity Area, which will improve connectivity between residential uses and business clusters. Given that the site is not located in a designated retail centre, imperative that the any uses do not impact on the viability of nearby town centres.
IIA4: Employment & Skills	+	M	D	R	I	P	LT	The site is expected to provide access employment opportunities for residents. This is expected to include a range of employment spaces to meet the needs of various sizes of businesses. The Site is also within close proximity to the Isle of Dogs Activity Area, which will improve access to a range of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide approximately 950 homes, which will work positively towards achieving the borough's housing target. Further details on the level of affordable and accessible housing are required.
IIA6: Crime & Safety	+	L	D/I	L	R	P	LT	The site is within the 30-50% most deprived neighbourhoods nationally with regards to crime. The site is expected to improve public realm and provide additional open spaces which should increase natural surveillance and therefore reduce crime and fear of crime.
IIA7: Sustainable Transport	-	L	D	L	I	P	LT	The site is in good proximity to local bus stops and rail links, however there is limited access to underground links, and poor connectivity to cycle networks, this is reflected in the PTAL score of between 1b-2. It is expected that walking and cycling connections to, from and within the site will improve sustainable transport links and reduce car dependency within the local area.

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	L	D	L	I	P	LT	The exiting site has good access to facilities and services, and new community infrastructure is proposed, so residents will be able to live more locally and reduce their need to travel. Development at the site is expected to ensure connectivity to existing infrastructure.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	ST/LT	There are no statutory or non-statutory designated sites located within the site area. Mudflats (priority habitats) are located approximately 0.1km to the south west of the site and the site is adjacent to the Millwall and West India Docks SINC. There is potential for some adverse effects during construction, however increased green space is proposed as part of the development which will improve urban greening and provide GI
IIA10: Landscape & Townscape	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated within the Millwall Inner Cluster TBZ. It is expected that development will respond positively to the existing character of the surrounding built environment and its dockside location, however finalised details of this have not currently been realised. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. The site is adjacent to the Queen Mother Gardens and Sir John McDougall Gardens, it is assumed the built form will respect these open spaces in regard to their scale.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA and will be visible from some areas of the Chapel House conservation area, the site is outside the buffer zone of the Maritime World Heritage Site but may impact on its setting. The built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	-	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, the site will also provide an outfall for surface water drainage into the docks.
IIA13: Water Quality	-	H	D/I	L	I	P/T	ST/LT	The site is located adjacent to Millwall Dock. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Millharbour South.</p> <p>IIA1/2: If construction of this site and the Millharbour South site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Millharbour South site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Millharbour South site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on the townscape in combination with neighbouring site Millharbour South.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Millharbour South.</p> <p>IIA14: If construction of this site and the Millharbour South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Millharbour South site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Millharbour South site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Millharbour South is likely to result in a cumulative increase in waste.</p>							

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12/13: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-33 – Wood Wharf

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide up to 3,600 new homes, of which at least 25% will be affordable and the development will include at least 10% wheelchair adaptable homes. In addition, there will be new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
IIA2: Human Health	++	H	D	R	I	P	LT	The site is located in an area with an overall moderate health deprivation (30-50% most deprived). As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and it also expected to deliver further community services and facilities through the provision of new healthcare and new open spaces which will improve access to health services, as well as improve physical and mental health and wellbeing and reduce level of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to be delivered. The site will deliver new community facilities and services and so it is expected that it will facilitate improvements to health and wellbeing. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	The South Quay neighbourhood centre is located at the west of the site. The site also falls within the Isle of Dogs Activity Area and Canary Wharf Major Town Centre, and so the provision of residential and employment space within the site is expected to improve and enhance the connectivity between business clusters and the housing market. It is not anticipated that retail development will be a feature of the site, however it is imperative that any retail development does not detrimentally impact on the vitality of the designated retain centre.
IIA4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf town centre and primary shopping areas. This will likely improve access for residents to employment opportunities. It is assumed that employment space will be delivered as part of the development of the site, and so will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	+	M	D	L	I	P	LT	The provision of 3,600 new homes will help towards meeting LBTH's housing target The site will provide up to 3,600 new homes, of which at least 25% will be affordable and the development will include at least 10% wheelchair adaptable homes The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown.
IIA6: Crime & Safety	+	M	D/I	L	R/I	P/T	ST/LT	The site is situated within a 30-50% most deprived area in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network, this is reflected in the site having a PTAL level of between 3-6a. The site is expected to improve walking and cycling connections, which will support new sustainable transport options for future population growth, The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to cycle and pedestrian access are expected to be delivered as part of the site.
IIA8: Accessibility	++	H	D	L	I	P	LT	The existing site has access to some facilities and services and the proposal includes further provision for community facilities and services. In addition, the site will be provisioning a new primary school and GP surgery thus increasing the allowance for residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	MT/LT	The site is within close proximity to a mudflat priority habitat. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, and it is anticipated that improvements will be made to biodiversity and ecology along the water's edge. However, it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Tall Building Zone. Full details of the scale of buildings are currently unknown, this is likely to be determined by individual design. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs Archaeological Priority Area. The site is also adjacent to the Coldharbour Conservation Area and sits directly on the grade 1 Blackwall Basin. Any development of the site will need to protect and enhance the setting of heritage assets, including the historic docks and the Maritime Greenwich World Heritage Site. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	+	H	D/I	L	I	P	LT	The site is located within flood zone 2 and 3. The development of the site is supported by a Flood Risk Assessment (FRA) and will or has the capacity to raise site level defences to 6.2m AOD. Accordingly, it is considered flood risk can be adequately mitigated.
IIA13: Water Quality	+/-	H	D	L/R	I	P	ST/LT	Storm water discharge from buildings and promenades would be discharged into the docks where possible. This is more sustainable than discharging into the sewer system as the trunk sewer in Preston's 155 Road is combined. In addition, it would also increase the risk that combined sewer overflows (CSO's) would discharge foul sewerage into the River Thames during storm events. Conditions will ensure that run-off from the road network are appropriately attenuated to ensure that pollutants do not enter the dock system. However, there is potential that construction at the site may result in contamination of this water body as a result of surface runoff. The site will include opportunities for greywater re-use. If implemented, this could contribute to improving the water efficiency of the site.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. The site provides new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+	H	D	R	I	P	T	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. The site will deliver SuDS, green spaces will be used within the development to reduce the UHI effect. The design of the scheme is expected to minimise the effects of solar gains and the UHI effect by virtue of scale, massing and layout.

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Heating will be delivered using a site wide energy network served by a combined heat and power system. Solar PV will be incorporated into the construction of buildings. Energy efficiency design measures will minimise the energy demand of the site.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites.</p> <p>IIA1/2: If construction of this site and the Canada Square and Churchill Place and Billingsgate Market sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Canada Square and Churchill Place and Billingsgate Market sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Canada Square and Churchill Place and Billingsgate Market sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape and the strategically important skyline in combination with neighbouring sites Canada Square and Churchill Place and Billingsgate Market.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Canada Square and Churchill Place and Billingsgate Market sites.</p> <p>IIA14: If construction of this site and the Canada Square and Churchill Place and Billingsgate Market sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Canada Square and Churchill Place and Billingsgate Market sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Canada Square and Churchill Place and Billingsgate Market sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites, Canada Square and Churchill Place and Billingsgate Market, are likely to result in a cumulative increase in waste.</p>							

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-34 – 10 Bank Street

Site Name	10 Bank Street							
Site Capacity	575							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	R	I	P	LT	The site has potential to provide approximately 575 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including health and community facilities. However, the closest secondary school is 1.35km away and requires crossing the river using Canary Wharf underground or ferry links.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and leisure facilities; however, health deprivation is in the top 30-50% nationally. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver pocket parks, which will provide publicly accessible open space, improving wellbeing for the local community.
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	The site is within the 30-50% most deprived nationally in terms of income. The site is located within Canary Warf Major Town Centre and is in close proximity to the Isle of Dogs Activity Area and Canary Warf primary shopping areas. The site will also include retail space within the development. This will improve proximity and availability of town centre uses within the development. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area.
IIA4: Employment & Skills	+	M	D	L	I	P	LT	The site is expected to provide access employment opportunities for residents. This is expected to include a range of employment spaces, including office and retail space. The site is well located to existing employment areas including the Canary Warf Major Town Centre, the Isle of Dogs Activity Area and Canary Warf primary shopping areas. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 575 new homes will help towards meeting LBTH's housing target. However, it is unclear what proportion of homes will be made affordable and the size, type and tenure of homes. It is assumed that the site will provide 35% affordable housing, meeting the minimum target.

Site Name	10 Bank Street							
Site Capacity	575							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	I	L	I	P	LT	The site is located within an area of low crime deprivation (10%-20% least deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	L	D	L	I	P	LT	The site has good connectivity via public transport through bus and overground and underground rail. This is reflected in the PTAL score of between 5 and 6a. The site is also close to the national and London cycle networks. The site will also improve the walking and cycling connections to the South Dock from the site and create additional public access routes on the east and west, as well as between Middle and South Docks.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	-	L	I	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the northwest of the adjacent site, Riverside South, so there is a potential negative effect on ecology as a result, particularly from noise and dust spoiling during construction. However, it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. It is currently uncertain if development of the site will provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown, this is likely to be determined by individual design. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Isle of Dogs APA, so it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade 2 Historic Lock south of the Riverside South site, the Grade 2 listed building also south of Riverside South and a Grade 2 listed gate at Wesferry/Park Place. Two conservation areas are located within 0.7km North of the site. It is therefore pertinent that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. It is unknown whether there will be any enhancements to the public realm which may improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.

Site Name	10 Bank Street							
Site Capacity	575							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA12: Flooding	-	H	D	L	I	P	LT	The site is located within flood zone 2 and 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, the site will also provide an outfall for surface water drainage into the docks.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the Middle and South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site. The site has average access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	Climate and heat risk at the site is medium. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	10 Bank Street							
Site Capacity	575							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Westferry and Park Place and 10 Bank Street.</p> <p>IIA1/2: If construction of this site and the Riverside South and Marsh Wall West sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA5: In combination, this site and the Westferry and Park Place and Riverside South sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring sites Westferry and Park Place and Riverside South.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets.</p> <p>IIA14: If construction of this site, the Westferry and Park Place, Riverside South and Marsh Wall West sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site, Westferry/Park Place, Riverside South and Marsh Wall West sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites, Westferry and Park Place, Riverside South and Marsh Wall West sites are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12/13: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Westferry/Park Place

Table G-35 – Westferry/Park Place

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	R	I	P	LT	This site has potential to provide approximately 550 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will also provide additional community facilities, however the nature of these is currently unknown.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is in the top 30-50% nationally. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver pocket parks, which will provide publicly accessible open space and improved public realm, improving wellbeing for the local community.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the 30-50% most deprived nationally in terms of income. The site is located within Canary Warf Major Town Centre and is in close proximity to the Isle of Dogs Activity Area and Canary Warf primary shopping areas. The site will also include commercial space, however at this stage it is not known if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the 30-50% most deprived nationally in terms of employment. The site is well located to existing employment areas including the Canary Warf Major Town Centre, the Isle of Dogs Activity Area and Canary Warf primary shopping areas. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 550 new homes will help towards meeting LBTH's housing target. However, it is currently unclear what proportion of homes will be made affordable and the size, type and tenure of homes. It is assumed that the site will provide 35% affordable housing, meeting the minimum target.
IIA6: Crime & Safety	+	M	I	L	I	P	LT	The site is located within an area of low crime deprivation (10%-20% least deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development. However, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	H	D	L	I	P	LT	The site has good connectivity via public transport through bus and overground and underground rail. This is reflected in the PTAL score of between 5 and 6. The site is also close to the national and London cycle networks. The site will also improve walking and cycling connections between the site and Middle Dock.
IIA8: Accessibility	+	H	D	L	I	P	LT	The existing site has good access to a range of facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel by car as multiple public transport options are nearby, including bus stops, underground (of which Canary Wharf is wheelchair accessible and has 14 Electric Vehicle (EV) charging points), rail and ferry. The national and London cycle networks are also nearby.
IIA9: Biodiversity & Natural Capital	-	M	D	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the southwest of the adjacent site, Riverside South so there is a potential negative effect on ecology as a result, particularly from noise and dust spoiling during construction. Limited information on the provision of GI is known at this stage and whether the site will be in line with BNG targets of BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unclear.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. The tallest point should be located in the west of the site, fronting Westferry Circus and heights will be stepped down to the east and south. Full details of the scale of buildings and their impact on the Canary Wharf Area Strategically Important Skyline are currently unknown, this is likely to be determined by individual design. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	--	H	D	R	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, so it is pertinent to protect and enhance the setting of heritage assets in and around the area as the proposed location sits directly on a Grade 2 listed gate. Two conservation areas are located within 0.4km North of the site. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Development of the site may also result in damage to, or loss of, the Grade 2 listed gate. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	This site is located within flood zone 2 and 3 and a flood risk zone. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the North Dock, thus creating potential for increased surface runoff during construction, further polluting this watercourse. No details have been provided on how water quality will be protected through development.

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	D/I	L	R	T/P	ST/LT	Air quality is generally good at the site, however, levels of NO ₂ are >28-43µ/m ³ . The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a low-medium overall climate risk and heat risk rating. However, the site is located within an area of flood risk and flood zone 2 and 3. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Riverside South.</p> <p>IIA1/2: If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA5: In combination, this site and the Riverside South site will significantly increase housing stock.</p> <p>IIA10: In combination with construction at the Riverside South site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Riverside South.</p> <p>IIA14: If construction of this site and the Riverside South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Riverside South site are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site, Riverside South, are likely to result in a cumulative increase in waste.</p>							

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Alternative Sites RAG Analysis

Table G-36 - Alternative Sites RAG Analysis results

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
I/A1 Population Density	Red	Red	Red	Red	Amber	Red	Red	Red	Red	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red
I/A1 Higher Education	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green
I/A1 Secondary Schools	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
I/A1 Primary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A1 IMD Overall deprivation (LSOA)	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red
I/A2 Open Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Children Centres	Green	Red	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Community Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Allotments	Green	Green	Green	Red	Green	Red	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green
I/A2 IMD Health (LSOA)	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber
I/A2 Life Expectancy Male	Red	Red	No data	Green	Amber	No data	Red	Red	Red	Red	Red	No data	Amber	Green	Green	Green	Green	No data	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA2 Life Expectancy Female	Amber	Amber	No data	Green	Green	No data	Amber	Amber	Red	Red	Amber	No data	Green	Amber	Amber	Amber	Amber	No data	Green
IIA2 Sport Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Healthcare Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Town Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Neighbourhood Parade	Red	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Primary Shopping Areas	Green	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Red	Green	Green
IIA3/4 Local Industrial Location	Green	Green	Red	Red	Red	Green	Green	Red	Green	Red	Red	Green	Red	Green	Green	Green	Red	Red	Green
IIA3/4 Tower Hamlets Activity Areas	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Green	Amber
IIA3/4 Central Activities Zone	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA3/4 IMD Income (LSOA)	Red	Red	Amber	Amber	Red	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red
IIA3/4 IMD Employment (LSOA)	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Red	Red	Red	Red	Green	Red

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA3/4 Strategic Industrial Locations	Green	Green	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Green	Green	Green	Green	Red	Red
IIA5 IMD Barriers to housing (LSOA)	Red	Amber	Red	Red	Red	Red	Amber	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Amber	Red	Red
IIA5 House Price	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red
IIA6 Crime Rate	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA6 IMD Crime (LSOA)	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Amber
IIA7/8 London Cycle Network	Green	Red	Green	Red	Green	Red	Red	Red	Red	Red	Green	Green	Green	Red	Red	Green	Red	Red	Red
IIA7/8 Tube Stations	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green
IIA7/8 Train Stations	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 PTAL	Amber	Amber	Red	Red	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber
IIA7/8 Bus Stops	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green
IIA7/8 National Cycle Network	Red	Red	Green	Red	Green	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red
IIA7/8 EV Charger Points	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate	
IIA9 Priority Habitat Inventory	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Red
IIA9 SAC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SPA	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SSI	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 LNR	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA9 NNR	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SINC	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red
IIA10 Green Belt	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Metropolitan Open Land	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Local Open Spaces	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Red	Green	Green	Green
IIA10 London View Management Framework	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Tall Building Zone	Green	Green	Red	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green
IIA10 London Squares	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Strategically Important Skyline	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA11 Listed Buildings	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Green	Red	Red	Red	Amber	Green	Green	Green	Green	Green
IIA11 Scheduled Monuments	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Heritage at risk	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Conservation Areas	Red	Red	Green	Green	Red	Green	Green	Red	Red	Green	Red	Red	Red	Green	Green	Green	Red	Red	Amber
IIA11 Parks and Gardens	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Archaeological Priority Area	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red	Red	Green	Red	Green	Green	Green	Red	Red
IIA12 Flood Zone	Green	Red	Red	Red	Red	Red	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Red	Red
IIA12 Flood Risk Area	Amber	Amber	Amber	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Amber	Amber
IIA13 Water Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA13 Statutory Main River	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA14 NO2	Amber	Green	Green	Green	Red	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Green	Green	Green	Green	Green
IIA14 PM10	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Green	Green	Green	Green	Green
IIA14 Air Quality	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA15 Climate Risk	Red	Red	Red	Green	Red	No data	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber
IIA15 Heat Risk	Amber	Amber	Red	Amber	Red	No data	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber
IIA17 Safeguarded Wharves	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Alternative Sites Assessment Summaries

Neptune Wharf

Table G-37 - Neptune Wharf

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide around 100 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. At this stage, it is unknown whether these units will be accessible and wheelchair adaptable, and the number of homes which will be affordable, the area is located within the 30-50% most deprived neighbourhoods and so affordability will be a key consideration. The site has access to some community facilities which may help to reduce levels of inequalities. It is not clear on whether the site will provide any additional facilities. The site is not located within close proximity to secondary and higher educational institutions. The site was originally allocated to deliver a school, the site is now earmarked for housing. Therefore, further consideration as to the range and access to educational services will need to be considered to ensure that there is sufficient provision for communities.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the site. The site is adjacent to the Hackney Wick neighbourhood centre, and so consideration of maintaining the vitality and vibrancy of the existing centre will be necessary.
I/A4: Employment & Skills	+	M	D	R	I	P	LT	The site is well located within 350m of a locally significant industrial site, which may improve access for residents to employment opportunities. The potential to include employment space could provide new jobs, however details of this are not currently realised. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide approximately 100 new homes, which will contribute somewhat to the borough's housing targets, it will fall significantly below the threshold. No information is currently available on the level of affordable housing; however, affordability

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								issues are apparent in the local area, therefore affordable housing must be a main consideration in the delivery of the site.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	?	N/A	N/A	N/A	N/A	N/A	N/A	Access is available to the site via public transport through bus, Overground, underground and rail. The site currently has a PTAL score of 2. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel. Details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. It is unknown whether additional greenspace will be included within the site, or if BNG targets will be met.
IIA10: Landscape & Townscape	+	M	D	L	I	P	LT	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development will likely improve townscape and landscape setting.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site lies within the Fish Island Conservation Area and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. At this stage it is not clear whether development will include measures to enhance and restore the local historic environment.
IIA12: Flooding	--	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in Flood Zones 2 and 3, no details are currently understood relating to flood risk measures for the site.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is east-adjacent to a main river. No details are currently known relating to any measures to mitigate against water quality impacts.

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	I	L	R	P/T	ST/LT	Air quality at the site is good with low levels of NO ₂ and PM ₁₀ . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	Overall climate risk is high and overall heat risk is medium. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater</p> <p>IIA1/2: If construction of this site and the other allocated sites at Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites.</p> <p>IIA14: If construction of this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased deterioration in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities. This should take into consideration the removal of the school from the development.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15/16: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Hamlet Industrial Estate

Table G-38 - Hamlet Industrial Estate

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	+/-	L	D	R	I	P	LT	The site has potential to provide around 100 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. It is expected that an affordable housing threshold of 50% may be delivered, which is key given the area is located within the 30-50% most deprived neighbourhoods. At this stage, it is unknown whether these units will be accessible and wheelchair adaptable. The site has access to some community facilities which may help to reduce levels of inequalities. It is not clear on whether the site will provide any additional facilities. The site is not located within close proximity to secondary and higher educational institutions. Therefore, further consideration as to the range and access to healthcare and educational services will need to be considered to ensure that there is sufficient provision for communities.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The finer details of the development are not yet known, however the site is allocated for mixed use development which will include employment and residential floorspace, as well as restaurants and cafes. The site is adjacent to the Hackney Wick neighbourhood centre, and so consideration of maintaining the vitality and vibrancy of the existing centre will be necessary.
I/A4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is well located within 300m of a locally significant industrial site, which may improve access for residents to employment opportunities. The existing uses of the site comprise of light industrial units, whilst details are not currently available, this may lead to a loss of jobs. New employment is however expected to be created through the provision of employment floorspace, however the details of this are not currently fully understood. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	+/-	L	D	R	I	P	LT	The site has potential to provide approximately 100 new homes, which will contribute somewhat to the borough's housing targets, it will fall significantly below the threshold. No information is currently available on the level of affordable housing, however due to affordability issues prevalent in the local area, affordable housing must be a main consideration in the delivery of the site.

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). Active frontages and increased access will improve public use and improve natural surveillance. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	?	N/A	N/A	N/A	N/A	N/A	N/A	Access is available to the site via public transport through bus, overground, underground and rail. The site currently has a PTAL score of 2. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	L	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by population increases. This may conversely increase the need to travel. The site will deliver improved access to the lower-level towpath along the western bank of the Lee Navigation Canal; however, details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. It is unknown whether additional greenspace will be included within the site, nor are there any details on BNG.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development will likely improve townscape and landscape setting.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site lies within the Fish Island Conservation Area and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. It is assumed the site will be designed to be in-keeping with the designated heritage assets and their setting.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located in Flood Zones 2 and 3, no details are currently understood relating to flood risk measures for the site.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is east-adjacent to a main river. No details are currently known relating to any measures to mitigate against water quality impacts.

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+-	M	D	L	R/I	P/T	ST/LT	Air quality is good at the site, with low levels of NO ₂ and PM ₁₀ . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	Overall climate risk is high and overall heat risk is medium and the site is at risk of flooding. Climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater</p> <p>IIA1/2: If construction of this site and the other allocated sites at Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites.</p> <p>IIA14: If construction of this site and the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Hepscoot Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-39 – Millharbour South

Site Name		Millharbour South						
Site Capacity		320						
Site Source		New allocation						
Site Status		New allocation						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	+	M	D	L	I	P	LT	The site has potential to provide around 320 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. The area is within the 30-50% most deprived neighbourhoods. The site should seek to deliver at least 35% affordable housing and wheelchair accessible units. The site has good access to community facilities and is intended to provide further community infrastructure which will help to reduce levels of inequalities. Further consideration as to the range and access to healthcare and educational services will need to be considered to ensure that there is sufficient provision for communities.
I/A2: Human Health	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high. The site will lead to additional community facilities, including open spaces which are likely to improve local health and wellbeing. A green grid is proposed which will promote active transport modes and support sustainable and healthy living for residents.
I/A3: Economy & Town Centres	+	M	D	L	I	P	LT	Finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development to include employment space and retail offering which may improve the footfall to the Crossharbour district centre, therefore improving vitality. There are some businesses currently located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units may be a key concern.
I/A4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to the Isle of Dogs activity area, which will improve access for residents to employment opportunities. The site is within the 30-50% most deprived in terms of income and employment, and so ensuring sufficient access to a range of employment opportunities is imperative, a range of sizes of employment floorspaces are proposed to serve small to medium enterprises and therefore respond to changing demands in the employment market. There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide 320 new homes. which will contribute to the borough's housing targets, however, it will fall significantly below the threshold. Significant affordability issues are apparent in the local area, therefore affordable housing must be a main consideration in the delivery of the site.

Site Name	Millharbour South							
Site Capacity	320							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	D/I	L	R	P	LT	The site is located within the 30-50% most deprived neighbourhoods in terms of crime. Improvements to public open spaces, provision of walking and cycling links and the prioritisation of active frontages are expected to increase natural surveillance and therefore improve crime rates and fear of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	+/-	M	D	L	I	P	LT	The site is within close proximity to Tube and Train Stations, and easily access from bus stop within the site's proximity. The site is also served by both the National and London Cycle Network. Despite this, within the site there appear to be significant variances, as reflected in a PTAL score of 1b-5. Improvements and enhancements to walking and cycle links will help to facilitate a modal shift towards more sustainable modes.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services, and new community infrastructure is proposed, so residents will be able to live more locally and reduce their need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R/I	P/T	ST/LT	The site is less than 0.8km from the Mudchute Park Farm Local Nature Reserve and the site is adjacent to the Millwall and West India Docks SINC. There are no designated sites within the site's boundary. There is potential for some adverse effects during construction, however increased green space is proposed as part of the development which will improve urban greening and provide GI
IIA10: Landscape & Townscape	+	M	D	L	I	P	ST/MT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this Site will enhance the quality and condition of the townscape and landscape. The site is located within the Millwall Inner Dock Cluster Tall Buildings Zone, and so it is expected that the built form of development will respond positively to the surrounding built environment.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is located within the Isle of Dogs Archaeological Priority Area and is located close to the Maritime Greenwich world heritage site. It is therefore anticipated that the built form will protect and enhance the setting of heritage assets. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets
IIA12: Flooding	-	H	D	L	I	P/T	ST/LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to Millwall Dock. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.

Site Name	Millharbour South							
Site Capacity	320							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that the development could demonstrate potential to connect to the Barkantine Energy Centre and utilise the low carbon heat network. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Westferry Printworks.</p> <p>IIA1/2: If construction of this site and the Westferry Printworks site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Westferry Printworks site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Westferry Printworks site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape in combination with neighbouring site Westferry Printworks.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Westferry Printworks site.</p> <p>IIA14: If construction of this site and the Westferry Printworks site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Westferry Printworks site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Westferry Printworks site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Westferry Printworks is likely to result in a cumulative increase in waste.</p>							

Site Name	Millharbour South							
Site Capacity	320							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-40 – Orchard Wharf

Site Name		Orchard Wharf						
Site Capacity		350						
Site Source		New allocation						
Site Status		New allocation						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 350 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	+	L	D	L	I	P	LT	The proposed site is located close to London City Island town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
I/A4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 350 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (30%-50% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
I/A7: Sustainable Transport	--	M	D	L	R	P	LT	The site is not well located for public transport use. There is one bus stop in close proximity to the site and the closest overground rail station is 650m away. The site has a PTAL score of between 0 and 1b. This is likely to increase the need for residents to travel by car to access local services and facilities. It is also unclear if any additional public transport provision will be proposed as part of the site.

Site Name	Orchard Wharf							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	--	M	D	L	R	P	LT	The site is not well located for public transport use or local facilities and services. The site has a PTAL score of between 0 and 1b. Therefore, there is potential for the exclusion of social groups who rely on public transport. It is unclear if the site includes new facilities or services to meet the needs of the growing population in this area.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the BNG target of 2.5 biodiversity unit (BU) per hectare or 30% gain is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to Local Open Space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting. The site also borders the tall building zone, and there is potential for tall buildings to occur at this site, altering the view. However, this is currently uncertain.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Limmo APA. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within a flood risk area and within flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Thames. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
IIA14: Air Quality	+/-	M	D/I	L	R	P/T	ST/LT	The site provides access to bus and train services, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the

Site Name	Orchard Wharf							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the nearby sites of Blackwall Trading Estate and Leamouth Road Depot and Reuters.</p> <p>IIA1/2: If construction of this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA10: In combination with construction at the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites.</p> <p>IIA14: If construction of this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites of Blackwall Trading Estate and Leamouth Road Depot and Reuters is likely to result in a cumulative increase in waste.</p>							

Site Name	Orchard Wharf							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12/13: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Tobacco Dock

Table G-41 – Tobacco Dock

Site Name	Tobacco Dock							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain how many homes would be provided at the site. Additionally, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however it's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The proposed site is located close to multiple town centres, including Watney, Wapping Lane and Thomas Moore Street, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	+	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. It is currently uncertain if the site will include any additional retail space.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently unclear how many homes the site will provide. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (30%-50% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, Overground, underground and rail. The site has a PTAL score of between 2 and 4. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to transport, facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.

Site Name	Tobacco Dock							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small scale habitats and species during construction, as a result of noise and dust spoiling. No information has been provided on provision of GI. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to multiple areas of Local Open Space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape and townscape setting.
IIA11: Historic Environment	--	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity, including the Shadwell Roman Settlement Scheduled Monument. The site is located within the Shadwell Roman Settlement archaeological priority area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Development of the site may also result in damage to, or loss of, the scheduled monument.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	M	D/I	L	R	P/T	ST/LT	The site provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Tobacco Dock							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the nearby site of London Dock.</p> <p>IIA1/2: If construction of this site and the London Dock site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA10: In combination with construction at the London Dock site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the London Dock site.</p> <p>IIA14: If construction of this site and the London Dock site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the London Dock site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site of London Dock is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Canada Square/Churchill Place

Table G-42 – Canada Square/Churchill Place

Site Name	Canada Square/Churchill Place							
Site Capacity	250							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site will provide 250 new homes, which will not make a significant contribution to meeting the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities, and the life expectancy is higher than the national average for both males and females and health deprivation is low. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
I/A3: Economy & Town Centres	+	L	D	L	I	P	LT	The proposed site is located in a town centre and is adjacent to a primary shopping area, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if Churchill Place Shopping Mall will be lost as a result of the site and if the site will include any additional retail space.
I/A4: Employment & Skills	+/-	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document. The site does however remove the opportunity for potential employment space in this location.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site will provide 250 new homes, which will not make a significant contribution to meeting the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
I/A6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of low crime deprivation (lowest 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
I/A7: Sustainable Transport	-	L	D	L	I	P	LT	Access is readily available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 6a and 5. There are no plans for additional transport provision.
I/A8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services, shown by the site having a PTAL scores ranging between 6a and 5. The site will allow residents to live their lives more locally and reduce the need to travel.

Site Name	Canada Square/Churchill Place							
Site Capacity	250							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA10: Landscape & Townscape	-	L	D/I	L	R	T	ST	The site is located next to designated open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to enhance the existing and provide further open spaces and the public realm and improve the quality and condition of the townscape and landscape.
IIA11: Historic Environment	-	L	I	R	I	P	LT	The site is located within an APA, and 0.3km from Coldharbour Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is partially located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to a waterway leading from the River Thames. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Canada Square/Churchill Place							
Site Capacity	250							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 250 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites of Wood Wharf and Billingsgate Market.</p> <p>IIA1/2: If construction of this site and the Wood Wharf and Billingsgate Market sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Wood Wharf and Billingsgate Market sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Wood Wharf and Billingsgate Market sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Wood Wharf and Billingsgate Market sites.</p> <p>IIA14: If construction of this site and the Wood Wharf and Billingsgate Market sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Wood Wharf and Billingsgate Market sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites of Wood Wharf and Billingsgate Market is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/5/8: Units within the site should be made accessible and wheelchair adaptable.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum urban greening factor UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12/13: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

London Chest Hospital

Table G-43 - London Chest Hospital

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 290 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high, so affordability needs to be a key consideration. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high (30%-50% of most deprived neighbourhoods) and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located within close proximity to a primary shopping area, neighbourhood parade and town centre. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 290 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (top 30-50% of most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has good access to the site via public transport through bus, overground, underground and rail. However, the underground rail is located 610m from the site. This is reflected by the site having a PTAL scores ranging between 2 and 4. It is uncertain if there are plans for additional transport provision.

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located 60m south of Local Open Space at Victoria Park. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	--	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within St James' Cemetery and Bonner Manor Archaeological Priority Area, and within the Victoria Park Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site is also likely to result in the demolition of existing listed buildings at the site, and alterations to the remaining main hospital listed building. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	-	L	D	L	I	T	ST	The site is located 50m south of the Grand Union Canal. There is potential for increased surface runoff during construction, further polluting this watercourse.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors and schools surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marian Place Gasworks and The Oval.</p> <p>IIA1/2: If construction of this site and the Marian Place Gasworks and The Oval site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA5: There is potential for cumulative effects on housing as a result of this site in combination with Marian Place Gasworks and The Oval.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archelogy from both this site and the Marian Place Gasworks and The Oval site.</p> <p>IIA14: If construction of this site and the Marian Place Gasworks and The Oval site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Marian Place Gasworks and The Oval site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Marian Place Gasworks and The Oval is likely to result in a cumulative increase in waste.</p>							

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: Phase 1 habitat surveys should be undertaken to determine if there are any species residing in the areas of priority habitat.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

LEB Building

Table G-44 - LEB Building

Site Name	LEB Building							
Site Capacity	190							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high, so affordability needs to be a key consideration. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high (30%-50% of most deprived neighbourhoods) and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is located adjacent to a primary shopping area and town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6b. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.

Site Name	LEB Building							
Site Capacity	190							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located 20m from Local Open Space at Bethnal Green Gardens. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity, including listed buildings and the registered park and garden of Bethnal Green Gardens. The site is also located within Bethnal Green Archaeological Priority Area, and within Bethnal Green Gardens Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium-high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing

Site Name	LEB Building							
Site Capacity	190							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites of Anchor Retail Park and Whitechapel North.</p> <p>IIA1/2: If construction of this site and the Anchor Retail Park and Whitechapel North sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Anchor Retail Park and Whitechapel North sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Anchor Retail Park and Whitechapel North sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Anchor Retail Park and Whitechapel North sites.</p> <p>IIA14: If construction of this site and the Anchor Retail Park and Whitechapel North sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Anchor Retail Park and Whitechapel North sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites of Anchor Retail Park and Whitechapel North is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-45 – 72-90 Chrisp Street

Site Name	72-90 Chrisp Street							
Site Capacity	150							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not make a significant contribution to meeting the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is well located, in close proximity to a number of town centres, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	+	M	D	L	I	P	LT	The site is well located close to Empson Street SIL, Canary Wharf major centre, and the Isle of Dogs Activity Area, providing opportunities for access to employment. However, it is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not make a significant contribution to meeting the borough's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	L	D	L	I	P	LT	The site is well connected via public transport through bus and Overground rail. However, the site is located more than 800m from the closest tube station. This is reflected in the site's PTAL score, ranging between 2 and 4. It is uncertain if there are plans for additional transport provision.

Site Name	72-90 Chrisp Street							
Site Capacity	150							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to Local Open Space at Alton Street. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Lea Valley archaeological priority area, and within Lansbury Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 2, with the eastern border of the site located in an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has existing good air quality and provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	72-90 Chrisp Street							
Site Capacity	150							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with Chrisp Street and Teviot Estate.</p> <p>IIA1/2: If construction of this site, Chrisp Street, and Teviot Estate were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site, the Chrisp Street, and Teviot Estate sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site, Chrisp Street, and Teviot Estate sites will significantly increase housing stock.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from this site, Chrisp Street and Teviot Estate.</p> <p>IIA14: If construction of this site, Chrisp Street and Teviot Estate were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site, Chrisp Street and Teviot Estate is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites of Chrisp Street and Teviot Estate is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Tower Hamlets Car Pound

Table G-46 – Tower Hamlets Car Pound

Site Name	Tower Hamlets Car Pound							
Site Capacity	120							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 120 homes, which will not make a significant contribution to meeting the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high, so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high (10%-20% of most deprived neighbourhoods) and life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is well located, adjacent to Limehouse town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
I/A4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas and has a high level of employment deprivation (10% - 20% most deprived). It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 120 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
I/A6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
I/A7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus and Overground rail. However, the site is located more than 800m from the closest tube station. Despite this, the site has a PTAL score ranging between 5 and 6b. It is uncertain if there are plans for additional transport provision.

Site Name	Tower Hamlets Car Pound							
Site Capacity	120							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There are no designated sites within the site. There is an area of priority habitat 160m from the site. Construction works have the potential to negatively impact this habitat and the species within it from noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to local open space, and the London Square of York Square Gardens. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is also located within York Square Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Tower Hamlets Car Pound							
Site Capacity	120							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with Watney Market.</p> <p>IIA1/2: If construction of this site and Watney Market were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Watney Market site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Watney Market site will significantly increase housing stock.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Watney Market site.</p> <p>IIA14: If construction of this site and the Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Watney Market site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Watney Market is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Anchor Retail Park

Table G-47 – Anchor Retail Park

Site Name	Anchor Retail Park							
Site Capacity	325							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+/-	M	D	R	I	P	LT	The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
IIA3: Economy & Town Centres	-	L	D	R	R	P	LT	The proposed site does not propose mixed use development such as employment space or retail and removes the current retail provision within the site.
IIA4: Employment & Skills	+/-	M	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site does however remove the current retail provision within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	-	L	D	R	I	P	LT	The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6. It is not clear whether there will be plans for additional sustainable transport provision.

Site Name	Anchor Retail Park							
Site Capacity	325							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
IIA11: Historic Environment	-	L	I	R	I	P	LT	The site has a number of heritage assets within its vicinity and is located within an Archaeological Priority Area, and St Peter's and Stepney Green Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.

Site Name	Anchor Retail Park							
Site Capacity	325							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North.</p> <p>IIA1/2: If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel North site.</p> <p>IIA14: If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Whitechapel North site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel North site is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/5/8: Units within the site should be made accessible and wheelchair adaptable.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-48 – Republic Estate

Site Name	Republic Estate							
Site Capacity	300							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+/-	M	D	R	I	P	LT	The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
IIA3: Economy & Town Centres	+/-	L	D	R	I	P	LT	The proposed site does not propose mixed use development such as employment space or retail. The site will improve and enhance connectivity between business clusters and the housing market however removes the opportunity for potential employment space in this location.
IIA4: Employment & Skills	+/-	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site does however remove the opportunity for potential employment space in this location. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	-	L	D	R	I	P	LT	The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
IIA7: Sustainable Transport	-	L	D	L	I	P	LT	Some access is available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 3 and 4. There are no plans for additional transport provision.
IIA8: Accessibility	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has average access to facilities and service, reflected by the site having a PTAL scores ranging between 3 and 4. At this stage it is not known how many units will be accessible and wheelchair adaptable, and if any accessible provision will be included as part of the site.

Site Name	Republic Estate							
Site Capacity	300							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
IIA11: Historic Environment	-	L	I	R	I	P	LT	The site has a number of heritage assets within its vicinity and is located within an Archaeological Priority Area, and adjacent to Naval Row Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has average access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Republic Estate							
Site Capacity	300							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Reuters and Aberfeldy Estate.</p> <p>IIA1/2: If construction of this site and the Reuters and Aberfeldy Estate sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Reuters and Aberfeldy Estate sites.</p> <p>IIA14: If construction of this site and the Reuters and Aberfeldy Estate sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Reuters and Aberfeldy Estate sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Reuters and Aberfeldy Estate sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/5/8: Units within the site should be made accessible and wheelchair adaptable.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Watney Market

Table G-49 – Watney Market

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain how many homes would be provided at the site. Additionally, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the town centre. However, there are a number of small businesses located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units will be a key concern.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone as well as primary shopping areas. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	It is unclear how many homes will be provided at the site. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus and overground and underground rail. Access to the national cycle network is also nearby. This is reflected by the site having a PTAL scores ranging between 6a. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The closest designated sites are priority habitats are located 0.25km south of the site in St George's gardens and whilst it does not fall within the boundary of this site, there is potential for some adverse effects on deciduous woodland found there. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not located within any LVMF or tall building areas, however, there are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has a number of heritage assets within its vicinity and is located within close proximity to an APA and is located on the border of a Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. At this stage it is not clear whether development will include measures to enhance and restore the local historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	Air quality at this site is considered at moderate levels (>28-43µ/m ³ for NO ₂ and PM ₁₀). The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating. Development specific climate resilience is not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is predominantly on previously developed land. The density of housing is not currently known nor is it clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel South.</p> <p>IIA1/2: If construction of this site and the Whitechapel South site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Whitechapel South site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Whitechapel South site will significantly increase housing stock.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from this site.</p> <p>IIA14: If construction of this site and the Whitechapel South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Whitechapel South site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel South is likely to result in a cumulative increase in waste.</p>							

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with Policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: Phase 1 habitat surveys should be undertaken to determine if there are any habitats/ species residing in St George's Gardens.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Table G-50 - Devons Road

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	R	I	P	LT	The site has potential to provide at least 2,100 new homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for student accommodation or wheelchair adaptable homes. Overall deprivation is very high, so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. At this stage it is not clear whether development would result in the loss of this open space.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, the site is located in the 30-50% most deprived area nationally. It is unknown if the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is well located, adjacent to Devons Road neighbourhood town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail or business space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is in the 10-20% least deprived nationally in terms of employment. The site is located adjacent to a strategic industrial location, offering opportunities for access to employment. At this stage it is not known if the site will offer additional facilities that offer employment options. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 2,100 new homes will help towards meeting LBTH's housing target. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	D/I	L	I	P	LT	The site is located in the 10%-20% most deprived area nationally for crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing is likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
IIA7: Sustainable Transport	+	L	D	L	I	P	LT	The site has average access to bus stops, rail station, the underground and the cycle network. This is reflected in the site having a PTAL level of between 2 and 4. The site is well located to local facilities and services which will allow residents to live their lives more locally.
IIA8: Accessibility	+	L	D	L	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel. Details on additional services and facilities are unknown at this stage.
IIA9: Biodiversity & Natural Capital	-	L	D/I	L	R/I	T	ST/LT	The site is adjacent to Tower Hamlets Cemetery Park local nature reserve and areas of deciduous woodland. Construction works have the potential to negatively impact small scale habitats and species from noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	M	D/I	R	R/I	P/T	ST/LT	The site is adjacent to local open space, there are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is adjacent to Lea Valley Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site provides access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Bow Common Lane.</p> <p>IIA1/2: If construction of this site and the Bow Common Lane site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA5: There is potential for cumulative effects on housing as a result of this site in combination with Bow Common Lane.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archelogy from both this site and the Bow Common Lane site.</p> <p>IIA14: If construction of this site and the Bow Common Lane site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Bow Common Lane site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Bow Common Lane is likely to result in a cumulative increase in waste.</p>							

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Hertsmere House

Table G-51 – Hertsmere House

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide 350 new homes. However, at this stage, it is not known how many of these units will be affordable, and whether there will be provision made for wheelchair adaptable homes. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. At this stage, details on any additional facilities are not available.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, it is unknown whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	The site is situated within the Isle of Dogs Activity Area and so there is likely good accessibility to employment opportunities, which is reflected in good levels of employment and income for the area. The finer details of the development are not yet known; however, it is assumed that the site will include some employment space which will provide further jobs for future residents and enhance connectivity between business clusters and the housing market. The site is located outside of a designated retail centre, and so any development should not impact on the vitality of nearby retail centres.
IIA4: Employment & Skills	+	M	D	L	I	P	LT	The site is situated within the Isle of Dogs Activity Area and so there is likely good accessibility to employment opportunities, which is reflected in good levels of employment and income for the area. The finer details of the development are not yet known; however, it is assumed that the site will include some employment space which will provide further jobs for future residents. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to deliver 350 homes, which will contribute somewhat to the borough's housing targets, however it will fall below the threshold. No details are currently available on the level of affordable housing. The provision of sufficient affordable housing is imperative given the significant barriers to housing which exist within the site. Currently, no details are known on the provision of accessible homes.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not considered to be within the most deprived neighbourhoods from a crime perspective. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	-	N/A	N/A	N/A	N/A	N/A	N/A	There is an average provision of public transport at the site, as reflected in a PTAL score between 3-4. The site is in close proximity to bus stops, underground and overground rail

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								links. A section of the London Cycle Network runs to the south of the site. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R/I	P/T	ST/LT	The site is around 0.8km from the Russia Dock Woodland. There is a potential negative effect on ecology as a result, particularly during construction. The site is also located in close proximity to a number of SINC's. Green space is proposed as part of the development which will improve urban greening and provide GI; however, it is unknown whether the site will be in line with BNG targets
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Canary Wharf Cluster Tall Building Zone. Development will need to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of development are currently unknown. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. Improvements to public realm are currently unknown.
IIA11: Historic Environment	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. The site is also adjacent to the West India Dock Conservation Area and the Narrow Street Conservation Area. Any development of the site will need to protect and enhance the setting of heritage assets, this will depend on the scale, massing, layout and materials that are proposed. However, details on this, and any potential enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. It is unknown whether the site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Northquay and Westferry and Park Place.</p> <p>IIA1/2: If construction of this site and the Northquay and Westferry and Park Place sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Northquay and Westferry and Park Place sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Northquay and Westferry and Park Place sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites Northquay and Westferry and Park Place.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Northquay and Westferry and Park Place sites.</p> <p>IIA14: If construction of this site and the Northquay and Westferry and Park Place sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Northquay and Westferry and Park Place sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Northquay and Westferry and Park Place sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Northquay and Westferry and Park Place sites are likely to result in a cumulative increase in waste.</p>							

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Samuda Estate

Table G-52 – Samuda Estate

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide 850 new homes, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities and will support a changing demographic.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and life expectancy is similar to the national average for both men and women. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is well located to existing employment areas, as it is in close proximity to the Isle of Dogs activity area. This will likely improve access for residents to employment opportunities. The site is located near to the South Quay neighbourhood centre, and it is imperative that any development does not lead to a negative impact on the centre. The site provides an opportunity to provide mixed use development which would further improve connectivity between business clusters and the housing market, however details of how this could be delivered are not currently apparent.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within close proximity to the Isle of Dogs Activity Area and the South Quay Neighbourhood centre, which are likely to improve access for residents to employment opportunities. The site is currently in the most deprived decile in terms of income and employment, and so it is important to ensure sufficient opportunities for a wide range of jobs is provided to avoid stagnation of the labour market. It is currently unclear as to whether any employment space within the site will be provisioned within redevelopment, affordability of new units may be a key concern. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 850 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	Most of the site area lies within the 20% most deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has average access to public transport, as reflected in a PTAL score between 2-3, the site is situated within reasonable proximity to bus stops and underground and overground stations. The site is not currently served by active transport links via the National or Local Cycle Network. It is not clear whether there will be plans for additional sustainable or active transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	-	L	I	L	R/I	P/T	ST/LT	The site is located adjacent to a mudflat priority habitat to the East. The Mudchute Park Farm Local Nature Reserve is situated less than 0.3km to the South West of the site. There are also a number of SINCs located in close proximity to the site. There is a potential negative effect on ecology as a result, particularly during construction. Currently, there are no details as to whether GI will be included within proposals, and whether the site will be in line with BNG targets.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development is likely to improve townscape and landscape setting. An area of local space is found west adjacent to the site, and any proposal coming forward will need to be designed with the preservation of the existing built form and density in mind.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Isle of Dogs archaeological priority area. Consideration should be given to ensure there is no impact on the setting of the historic docks and Maritime Greenwich World Heritage Site to the South, the Coldharbour Conservation Area to the North. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. It is unknown whether there will be any enhancements to the public realm which may improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	-	L	D/I	L	R/I	P/T	MT/LT	The site is located in close proximity to the River Thames, there is potential for increased surface runoff during construction, further polluting this watercourse.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site. The site has average access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	Climate and heat risk at the site is medium/medium-high. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Limeharbour and Crossharbour.</p> <p>IIA1/2: If construction of this site and the Limeharbour and Crossharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Limeharbour and Crossharbour sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Limeharbour and Crossharbour sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites Limeharbour and Crossharbour.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Limeharbour and Crossharbour site.</p> <p>IIA14: If construction of this site and the Limeharbour and Crossharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Limeharbour and Crossharbour sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Crossharbour and Limeharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Limeharbour and Crossharbour sites are likely to result in a cumulative increase in waste.</p>							

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							



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London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix H - Equalities Impact Assessment



London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix H - Equalities Impact Assessment

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1 Introduction

1.1 Background and context

- 1.1.1. The London Borough of Tower Hamlets (LBTH) is currently preparing a New Local Plan (NLP), which will replace The Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits adopted in 2020¹. The new Tower Hamlets NLP will comprise five sub-areas, as planning functions for the London Legacy Development Corporation (LLDC) in the north-east of LBTH are expected to be returned to LBTH in 2024. The sub-areas are City Fringe, Central Area, Lower Lea Valley, Isle of Dogs and South Poplar, and Hackney Wick and Fish Island (current LLDC area).
- 1.1.2. An Integrated Impact Assessment (IIA) has been undertaken to ensure that sustainability aspects are incorporated into the NLP. The IIA enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. This process also helps to simplify outcomes and recommendations for policymakers.
- 1.1.3. As part of the IIA, an Equality Impact Assessment (EqIA) has been undertaken to assess from an equality perspective the impacts and likely effects of policies in the NLP on different groups protected by equalities legislation, notably the Equalities Act 2010. It will also seek to identify whether such policy categories might have an adverse impact on equality of opportunity.
- 1.1.4. The outcomes of the EqIA have informed the IIA.

¹ Tower Hamlets Council (2020) Tower Hamlets Local Plan 2031. Available at: https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH_Local_Plan_2031_accessibility_checked.pdf

2 Legislation

- 2.1.1. The Equality Act 2010² came into force on 1 October 2010 and brought together over 116 separate pieces of legislation into a single Act. The Act provides a legal framework to protect the rights of individuals that share defined "protected characteristics" and advance equality of opportunity. In addition, the Act states that, when making decisions, an authority must consider methods to reduce any inequalities which may arise for those from a disadvantaged socio-economic background.
- 2.1.2. Those "protected characteristics" which identify the vulnerable groups who may be disproportionately impacted upon or discriminated against are outlined in **Table 2-1**. Protection extends to those who are perceived to have these characteristics or who suffer discrimination because they are associated with someone who has that characteristic, e.g. cares for someone with a disability.

Table 2-1 – Protected groups listed under the Equality Act 2010

Protected Characteristic	People and Aspects Included
Sex	Men, women, married and single people; parenting, caring, flexible working and equal pay concerns.
Religion or belief	People who have a religious belief; people who are atheist or agnostic; people who have a philosophical belief which affects their view of the world or the way they live.
Age	Children (0-16), young people (17-25), working age people (15-64) and elderly people (65 and over).
Disability	People with physical, mental, sensory, visible or hidden impairment (e.g. cancer, HIV, dyslexia).
Race	People from various ethnic groups, as for the Census categories, e.g. White British, Chinese, British Asians, Travellers, Gypsies, Roma, those who are of Caribbean origin, people of mixed heritage, White Irish communities, and people of other nationalities who reside in Britain.

² The Stationary Office, Equality Act 2010. Available at: http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf (Accessed: 17 January 2022)

Protected Characteristic	People and Aspects Included
Sexual orientation	Heterosexual and bisexual men and women, gay men and lesbians.
Gender reassignment (transgender)	Anyone who is proposing to undergo, is undergoing or has undergone a process for the purpose of reassigning their sex. This applies to anyone at any stage in the transition process, from proposing to reassign their sex, undergoing a process of reassignment, or having fully transitioned.
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby - protection against maternity discrimination (including as a result of breast feeding).
Marriage and civil partnership	People who are married or are civil partners.
Deprivation *	People at risk of socio-economic disadvantage. This also includes young people leaving the system.

** Although it is not included as a protected characteristic within the Equality Act 2010, deprivation has been included in the assessment as the Act also requires due regard to reducing the inequalities of outcome which result from socio-economic disadvantage.*

3 Equality Impact Assessment

3.1 What is EqIA?

- 3.1.1. An EqIA considers the impact of a project or policy on persons or groups of persons who share characteristics which are protected under section 4 of the Equality Act 2010 ("protected characteristics") and might also include others considered to be vulnerable within society such as low-income groups. It is an information gathering tool which enables decision makers within public bodies to implement their equality duty under the Equality Act 2010.
- 3.1.2. An EqIA guides decision makers and designers to:
- Consider the effects of existing and proposed policy or practice on people who share a "protected characteristic"; and
 - Identify opportunities to improve equality of opportunity and eliminate discrimination.
- 3.1.3. An EqIA should be carried out before making decisions, to inform and shape the outcomes. They should be updated throughout the decision-making process as necessary, as policy or practices are developed.
- 3.1.4. There are three stages to an EqIA: screening, full assessment and outcome monitoring. The screening stage determines which protected characteristics are likely to experience disproportionate impacts, and therefore require consideration within the EqIA. This considers the nature of the public function being exercised and available information on users and impacts. This document represents the assessment on those groups identified.

4 Social Profile

4.1 Introduction

- 4.1.1. A social profile for LBTH has been compiled from publicly available data to provide context for the assessment. This comprises information on the following:
- Protected characteristic groups;
 - Local communities; and
 - Sensitive receptors, local community facilities and public transport.

4.2 Local Community and Facilities

LBTH Community and Character

- 4.2.1. LBTH is an East London borough, comprising much of the 'traditional' East End. It was formed in 1965 from the merger of the former metropolitan boroughs of Stepney, Poplar, and Bethnal Green, named after the historic Tower Division. The borough now contains much of the regenerated London docklands area.
- 4.2.2. LBTH is a world-class hub for financial, professional, and technical sectors, and is home to London's financial district, Canary Wharf. The boroughs total economic output is higher than any of the core UK cities outside of London at £29.7b.
- 4.2.3. All new development must drive up the quality of design, constructed to the highest safety standards and improve the Borough's built environment and liveability.

LBTH Local Community Facilities

- Homes:
 - The Office for National Statistics (ONS) reports that the median price paid for homes at the end of December 2022 was £500k³.
 - As of 2022 the median house price in the borough was ten times the median income level⁴.
 - In 2019 there were 19,826 households on the Tower Hamlets housing register. This is the third highest waiting list in London after Newham and Lambeth, and the eighth highest nationally⁵.
- Businesses:

³ [Median house prices for administrative geographies: HPSSA dataset 9 - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

⁴ [House price to workplace-based earnings ratio](#)

⁵ [Housing Borough profile \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

- There are 17,000 businesses across the entire borough; and
- 278,000 jobs are generated by their presence⁶.
- Social infrastructure:
 - The Borough has three NHS hospitals; and
 - There are 60 nursery schools, 69 primary schools, 18 secondary schools, 13 sixth form colleges and six special schools.

Key Borough Concerns

4.2.4. LBTH Strategic Plan 2022-2026 highlights eight key priorities for the borough. These consist of:

- Tackling the cost-of-living crisis;
- Providing homes for the future;
- Accelerating education;
- Boosting culture, business, jobs, and leisure;
- Investing in public services;
- Empowering communities and fighting crime;
- Working towards a clean and green future; and
- A council that listens and works for everyone.

4.3 Protected Characteristics Profile

4.3.1. Data from the Office of National Statistics (ONS) has been gathered on the following protected characteristics from Section 4 of the Equality Act 2010:

- Sex;
- Religion;
- Age;
- Disability;
- Race;
- Sexual orientation;
- Pregnancy and maternity;
- Marriage and civil Partnership; and
- Gender reassignment.

4.3.2. Although not a protected characteristic under the Equality Act 2010, the social profile also includes data on deprivation as it provides a measure of a combination of social-economic metrics.

⁶ Tackling the housing crisis https://www.towerhamlets.gov.uk/lgnl/housing/Tackling_the_housing_crisis.aspx

4.3.3. It should be noted that the last Census was taken in 2021. Where there may be some datasets that are not yet available data has been substituted with 2011 census data and other more recent information.

4.4 Sex

4.4.1. The total population Tower Hamlets was recorded in 2021⁷ as 310,300 people. Within the Borough, approximately 50.2 % of the population were recorded as male and 49.8% as female, which is discordant with the wider London population of 48.5% male and 51.5% female. The percentage of the population who are male in the LBTH area is slightly higher than the national average, and the percentage of the population who are female is slightly lower, as shown in **Table 4-1**. Table 4-1 – Sex Profile 2021⁷

Sex	Tower Hamlets	%	London	%	Great Britain	%
All people	310,300		8,796,600		65,121,700	
Male	155,770	50.2%	4,267,500	48.5%	31,874,600	48.9%
Female	154,530	49.8%	4,529,100	51.5%	33,247,100	51.1%

4.5 Religion

4.5.1. As stated in the 2021 Census, of those in LBTH who identify with a religion, the largest group identify as Muslim (39.9%), which is discordant with the national trend. The second largest proportion of the population identify as having no religion (26.6%) as shown in **Table 4-2**.

Table 4-2 – Religion Profile 2021⁷

Religion	Tower Hamlets		England %
	Number in 2021	% Total pop in 2021	
Christian	69,223	22.3	46.3
Buddhist	2,961	1.0	0.5

⁷ <https://www.nomisweb.co.uk/reports/lmp/la/1946157252/report.aspx>

Religion	Tower Hamlets		England %
	Number in 2021	% Total pop in 2021	
Hindu	6,298	2.0	1.8
Jewish	1,341	0.4	0.5
Muslim	123,912	39.9	6.7
Sikh	966	0.3	0.9
Other religion	1,652	0.5	0.6
No religion	82,635	26.6	36.7
Religion not stated	21,318	6.9	6.0

4.6 Age

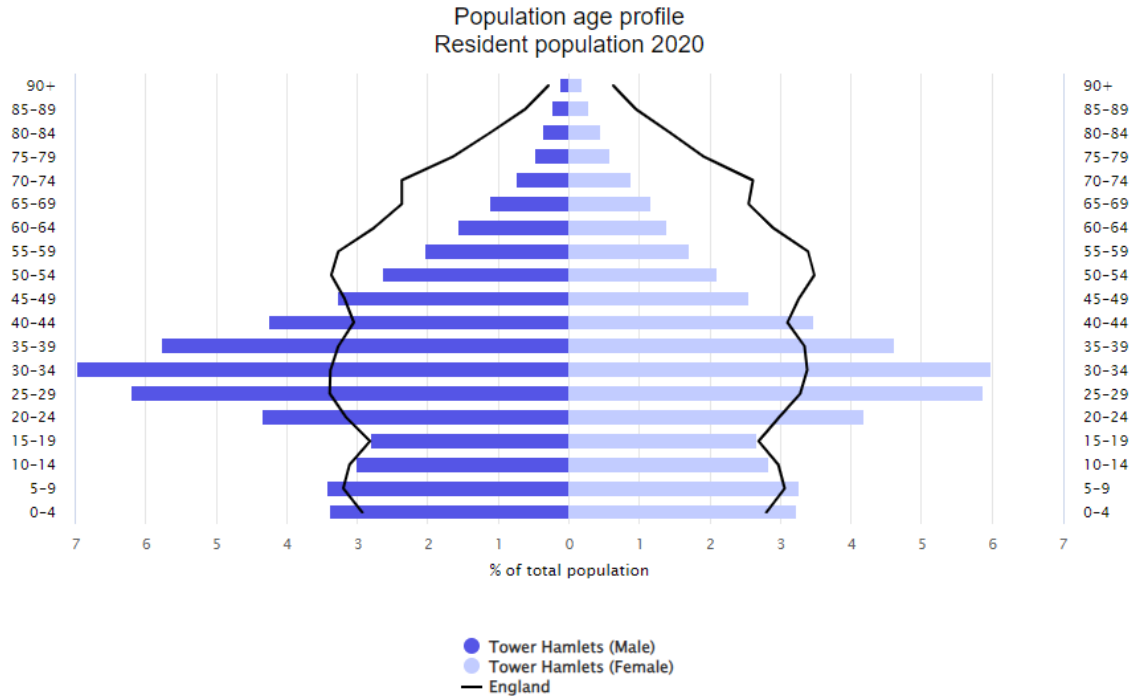
- 4.6.1. As of 2021, the median age in LBTH was 30 years of age, making Tower Hamlets the youngest borough by median age in England and Wales. In accordance with this, 52.9% of the population are aged 16-34.
- 4.6.2. The 2019 Local Authority Health Profiles data on population age shows that Tower Hamlets has a largely differing age structure to England across all age categories (**Table 4-3**). The age category with the greatest difference is 25 to 34 years old, which is 9.5% higher than the average for London and 13.9% higher than England.

4.6.3. **Figure 4-1** shows the population pyramid of the LBTH area population in 2020, which is the latest available population profile graphic. Although the data is slightly different to the 2021 data presented in Table 4-3 it still illustrates the general trends.

Table 4-3 – Age Profile 2021⁷

Age	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Aged 4 years and under	19,090	6.2	6.0	5.4
Aged 5 to 9 years	17,658	5.7	6.0	5.9
Aged 10 to 15 years	20,675	6.7	7.2	7.2
Aged 16 to 19 years	15,085	4.9	4.4	4.6
Aged 20 to 24 years	31,988	10.3	6.7	6.0
Aged 25 to 34 years	85,181	27.5	18.1	13.6
Aged 35 to 49 years	69,956	22.5	22.7	19.4
Aged 50 to 64 years	33,199	10.7	16.9	19.4
Aged 65 to 74 years	10,379	3.3	6.5	9.8
Aged 75 to 84 years	5,024	1.6	3.8	6.1
Aged 85 years and over	2,068	0.7	1.6	2.4

Figure 4-1 - Population age profile of the LBTH area in 2020⁸



Projected Population

- 4.6.4. Between the last two censuses (held in 2011 and 2021), the population of Tower Hamlets increased by 22.1%, from around 254,100 in 2011 to around 310,300 in 2021. This means the borough’s population saw the largest percentage increase in England. The population of London increased by 7.7%, while the population of England rose by 6.6%⁹.
- 4.6.5. The total population in the LBTH area is set to increase across most age groups by 2043, with an overall increase of 18.3%¹⁰. This projection is higher than the national trend of an expected 7.3% growth. The age group set to experience the biggest growth in this

⁸ Local Authority Health Profiles (2020) Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/12/gid/1938132696/pat/6/par/E12000007/ati/202/are/E09000020/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1> This is the latest age profile graphic available.

⁹ ONS, Census 2021, How life has changed in Tower Hamlets: Census 2021, 2023. [online] available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E09000030>

¹⁰ ONS. 2018. 2018-Based Subnational Population Projections for Local Authorities and Higher Administrative Areas in England. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/dataset/localauthoritiesinenglandtable2> (Accessed 19/01/2022)



timeframe is 75-79 group at 177.6 %. Age groups anticipated to experience decline are 5–9-year-olds (-2.6%), the 10-14 year olds (-2.6%), 35-39 year olds (-7.1%) and the 40-44 year olds (-6.5%). Further detail has been provided in Table 4-4 below. Table 4-4 – Population Projections 2023-2043¹⁰

Age Group	2023	2043	% Increase from 2023-2043
0-4	21,530	23,237	4.6%
5-9	22,170	21,592	2.5%
10-14	21,747	21,178	17.7%
15-19	20,228	22,629	35.2%
20-24	28,853	32,852	18.7%
25-29	40,585	45,059	9.7%
30-34	40,950	43,795	0.3%
35-39	35,693	33,144	2.1%
40-44	28,269	26,426	14.3%
45-49	21,730	25,004	42.2%
50-54	17,433	23,999	69.5%
55-59	14,153	23,111	107.6%
60-64	10,901	20,146	126.2%
65-69	8,621	16,028	137.8%
70-74	6,258	12,713	175.0%
75-79	4,139	9,609	177.6%
80-84	2,769	6,376	143.3%
85-89	1,764	3,686	124.0%
90+	1,012	1,989	136.5%
All ages	348,804	412,571	29.9%

4.7 Disability

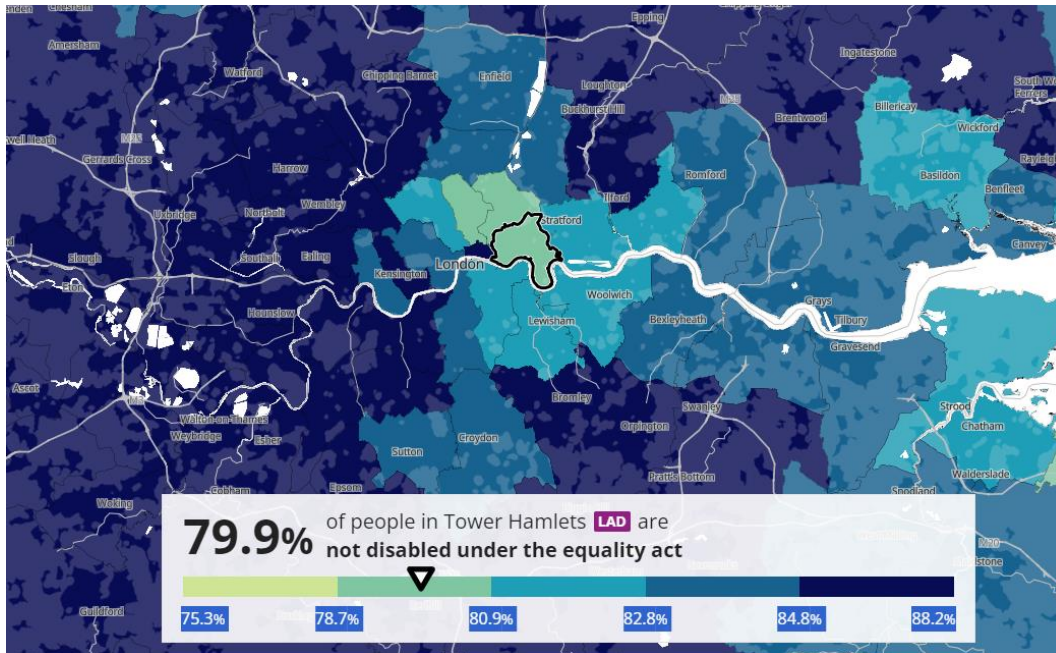
4.7.1. The social model of disability states that people are disabled by barriers in society, not by their impairment or difference. Barriers can be physical, like buildings not having accessible toilets. Or they can be caused by people's attitudes to difference, like assuming disabled people can't do certain things¹¹. **Table 4-5** shows the proportion of the population whose day-to-day activities are limited by a long-term health problem or disability in comparison to those that are not. The proportion of the population of LBTH who are limited in their day-to-day activities is representative of the regional average, at 13% and 13.2% respectively. The national average is slightly higher with 17.3% of the population experiencing some degree of limitation⁷.

Table 4-5 – Proportion of those living with limiting health problems or disability 2021⁷

Day to Day activities	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Limited a Lot	17,599	5.7	5.7	7.3
Limited a little	22,526	7.3	7.5	10.0
Not limited	14,091	4.5	5.2	6.8
No long-term physical or mental health conditions	256,090	82.5	81.5	75.9

¹¹ Social model of disability. Scope [online] available at: <https://www.scope.org.uk/about-us/social-model-of-disability/>

Figure 4-2 - Proportion of the LBTH population classified as disabled under the equality act in comparison to neighbouring boroughs¹².



- 4.7.2. **Figure 4-2** demonstrates the raised proportion of the LBTH population living with disability in comparison to neighbouring boroughs. 79.9% of the Tower Hamlets population live without disability, compared to 82.5% in Newham, and 85.5% in Redbridge.
- 4.7.3. Caring, as defined by the census question, refers to giving unpaid help to someone requiring help due to a health condition or disability or because of old age. 6.4% of LBTH residents aged 5 and over were defined as care providers in 2021. This figure is lower than the London average at 7.3%.
- 4.7.4. As of March 2023, there is an estimated 4,850 (1.4 %) people living with sight loss in the LBTH area. This includes around 3,180 (65.5%) people living with mild sight loss, 1,110 (22.8%) people living with moderate sight loss and 560 (11.5%) people living with severe sight loss. By 2032 there are expected to be 6,520 people in Tower Hamlets living with sight loss, an estimated increase of 34% over the next decade¹³.

¹² Census Maps (2021) <https://www.ons.gov.uk/census/maps/choropleth/health/disability-age-standardised/disability-4a/not-disabled-under-the-equality-act?lta=E06000023&lbd=E09000030> (Accessed: 05/09/2023)

¹³ RNIB Sight Loss Data Tool - statistics on sight loss | RNIB | RNIB

Table 4-6 – Age profile of those living with sight loss 2021¹³

Age	Tower Hamlets		England %
	Number in 2021 living with sight loss	% of Total in 2021 living with sight loss	
0-17	0	23	23
18-49	205	60	49
50-64	150	11	17
65-74	100	4	7
75+	305	3	6

4.7.5. As of 2019, it was estimated that 24,500 (7.9%) people in LBTH suffered from hearing loss¹⁴. NHS projections estimate an increase in those suffering from hearing loss of 5.1% by 2035, totalling a hearing loss prevalence of 13%, which is less than both the regional and national predictions of 19% and 25% prevalence respectively¹⁵.

4.8 Race

4.8.1. The 2021 Census data indicates that the majority of the population in the LBTH area is Asian, Asian British or Asian Welsh (44.4%). This group is represented at a percentage of 23.7% higher than the regional average and 34.8% higher than the national average respectively⁷. The largest sub group within this category is Bangladeshi, who make up 34.6% of the population.

¹⁴ [NHS England » Prevalence of hearing loss by CCG area \(2019 ONS predictions\)](#)

¹⁵ [NHS England » Hearing Loss Data Tool](#)

Table 4-7 – Ethnicity Profile⁷

Ethnic Group	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Asian, Asian British or Asian Welsh	137,856	44.4	20.7	9.6
Black, Black British, Black Welsh, Caribbean or African	22,693	7.3	13.5	4.2
Mixed or Multiple ethnic groups	15,409	5.0	5.7	3.0
White	122,266	39.4	53.8	81.0
Other ethnic group	12,082	3.9	6.3	2.2

4.9 Sexual Orientation

- 4.9.1. In LBTH the vast majority of the population identified as heterosexual at 83.1%. This is marginally lower than the regional and national average of 86.2% and 89.4% respectively. The proportion of the population that identify as gay or lesbian in LBTH is 2.2% higher than the London figure and 2.5% higher than the national figure. Bisexual identification follows a similar pattern in that the proportion is higher in LBTH than it is London and England⁷.
- 4.9.2. Taken together this means that 7.2% of residents identified as part of the LGBTQIA+¹⁶ community. This is significantly higher than the proportions of 4.2% in London and 3.1% in England and Wales¹⁷.

¹⁶ lesbian, gay, bisexual, transgender, queer, questioning, intersex, or asexual

¹⁷ Tower Hamlets, 2021 Census Findings, 2023 [online] available at: https://www.towerhamlets.gov.uk/Documents/Borough_statistics/Census-2021/2021-Census-key-finding.pptx#:~:text=Overall%20borough%20population.of%20Tower%20Hamlets%20was%20310%2C300.

Table 4-8 – Sexual Orientation Profile 2021⁷

Sexual Orientation	Tower Hamlets		London %	England %
	Number in 2021	% in 2021		
Straight or Heterosexual	210,070	83.1	86.2	89.4
Gay or Lesbian	10,021	4.0	2.2	1.5
Bisexual	6,376	2.5	1.5	1.3
Pansexual	1,161	0.5	0.4	0.2
Asexual	155	0.1	0.0	0.1
Queer	324	0.1	0.1	0.0
All other sexual orientations	90	0.0	0.0	0.0
Not answered	24,688	9.8	9.5	7.5

4.10 Pregnancy and Maternity

- 4.10.1. A maternity is a pregnancy resulting in the birth of one or more children, including stillbirths. In 2016 the maternity rate in the LBTH area was 53.1 (maternities per 1,000 women aged 15 to 44), lower than the maternity rates for London and England, of 62.8 and 61.8 respectively¹⁸. The greatest amount of live births in the LBTH area are from women in the age category 30-34, which is in line with London and England. Births in the under eighteen age group are less prevalent in LBTH than they are in London and England, with only 0.1% of all live births being to mothers aged eighteen and under compared to 0.4% and 0.8% respectively. Table 4-9 shows Live Births by Age of Mother for LBTH, London and England.
- 4.10.2. In the LBTH area 34.7% of all live births occur outside of marriage or civil partnership. This is a lower proportion than the regional and national averages by 1.7% and 12.2% respectively. This indicates that more live births in the LBTH area occur within marriage or civil partnership than outside of it.

¹⁸ ONS (2016) Live births in the UK by area of usual residence of mother. Available at : <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/birthsbyareaofusualresidenceofmotheruk> (Accessed 20/01/2022)

Table 4-9 – Live Births by Age of Mother 2016¹⁸

Age of Mother at Birth	Tower Hamlets		London %	England %
	Number in 2016	% of Total live births in 2016		
Under 18	6	0.1	0.4	0.8
Under 20	63	1.4	1.8	3.2
20 to 24	448	9.8	9.9	14.6
25 to 29	1,285	28.0	23.6	28.0
30 to 34	1,643	35.8	34.9	31.8
35 to 39	922	20.1	23.4	18.1
40 to 44	211	4.6	5.7	4.0
45 and over	20	0.4	0.6	0.3
Total Live Births (Number in 2016)	4,592		128,803	663,157
Total Fertility Rate Total Live Births (Number in 2016)	1.39		1.72	1.81

4.11 Marriage and Civil Partnership

4.11.1. The percentage of the population which is married or in civil partnership in LBTH is 8% lower than the regional average and 12.7% lower than the national average. In line with this the proportion of the population who are divorced is also lower than the regional and national average by 1.5% and 4.1% respectively.

Table 4-10 – Marriage and Civil Partnership Profile 2021⁷

Marriage / Civil Partnership	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Never married and never registered a civil partnership	147,392	58.3	46.2	37.9
Married or in a registered civil partnership	80,955	32.0	40.0	44.7
Separated, but still legally married or still legally in a civil partnership	5,013	2.0	2.3	2.2
Divorced or civil partnership dissolved	12,738	5.0	7.3	9.1
Widowed or surviving civil partnership partner	6,787	2.7	4.2	6.1

4.12 Unemployment and Deprivation

4.12.1. There is a smaller proportion of economically active population in LBTH than in the wider London region and the UK. The proportion of unemployment in LBTH is also marginally higher than the national average by 1%.

Table 4-11 – Employment status in LBTH, London and England

Employment and Unemployment	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Economically active	190,300	76.6	79.8	78.5
In employment	180,900	72.8	76.2	75.6
Unemployed	8,700	4.6	4.4	3.6

4.12.2. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small neighbourhoods in England. IMD is used by local governments to focus programmes in the most deprived areas and develop strategies, such as the NLPR. IMD measures deprivation in small areas / neighbourhoods called Lower Super Output Areas (LSOAs). There 32,844 LSOAs in England.

4.12.3. In the LBTH area, there are 144 LSOAs. In 2019 of the 144 LSOAs¹⁹:

- Two LSOAs are within the top 10% most deprived neighbourhoods;
- 84 LSOAs are within the 20-30% most deprived neighbourhoods;
- 35 LSOA's are within the 40-50% of most deprived neighbourhoods;
- 14 LSOA's are within the 40-50% least deprived neighbourhoods;
- Eight LSOA's are within the 30-20% least deprived neighbourhoods; and
- One LSOA's in LBTH are within the 10% least deprived neighbourhoods.

4.12.4. The most deprived LSOAs in the LBTH area are located in the north of the borough and consist of the wards Lansbury, St. Peter's and Stepney green.

4.12.5. The least deprived LSOAs in the LBTH area are located in the south of the borough and consist of the wards Island Gardens, Canary Wharf and St Katherine's and Wapping.

4.12.6. As of 2013, 32,220 of the total population of LBTH were recipients of both housing benefits and council tax benefits. This is a relatively high proportion of the population in comparison

¹⁹ Indices of Deprivation (2019) Indices of Deprivation: 2015 and 2019- Open Data Blog [online] Available at: http://dclgapps.communities.gov.uk/imd/iod_inex.html (Accessed 25/01/2022)

to alternative London boroughs. For neighbouring borough Newham, only 30,740 residents were in receipt of these benefits²⁰.

4.13 Gender Reassignment

4.13.1. Trans is a general term for people whose gender is different from the gender assigned to them at birth. According to 2021 Census data, only 1% of the LBTH population have a gender identity different from their sex registered at birth. Neighbouring boroughs have similar figures of 1.07% for Hackney and 1.51% for Newham. Outside of the London area these figures are even lower, predominantly <1%.

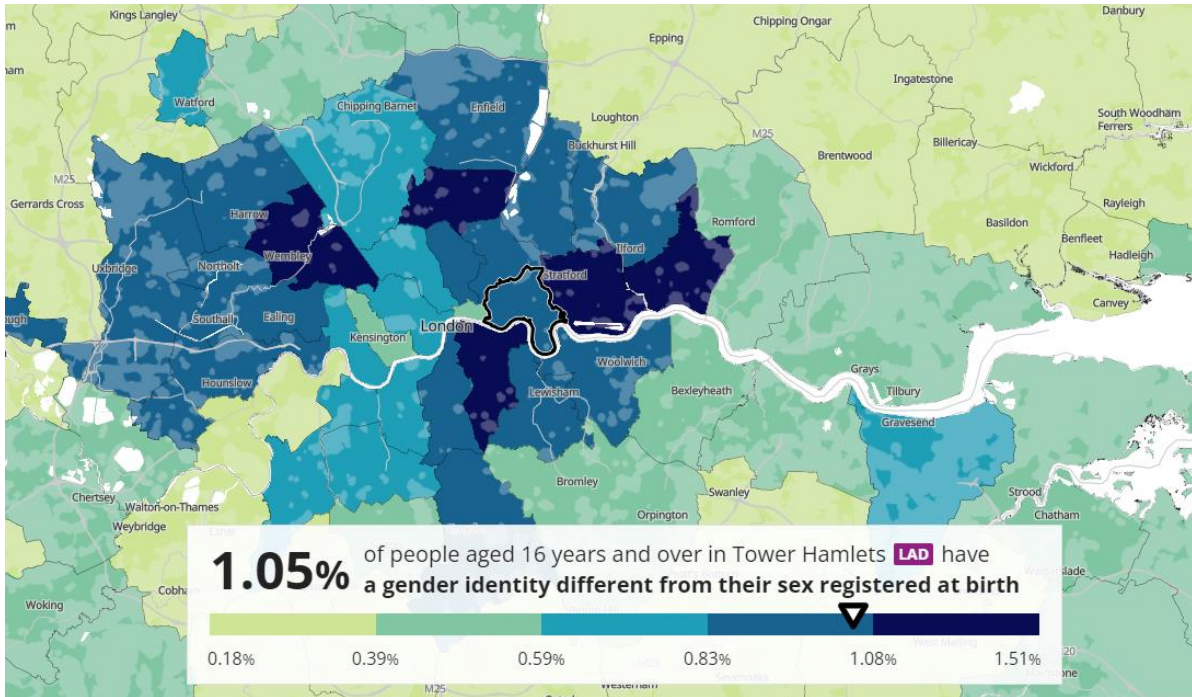
Table 4-12 – Gender Identity in Tower Hamlets and London

Gender Identity	Tower Hamlets	Tower Hamlets %	London	London %
Gender identity the same as sex registered at birth	229,263	90.7	6,479,664	91.2
Gender identity different from sex registered at birth but no specific identity given	1,438	0.6	32,753	0.5
Trans Woman	344	0.1	11,266	0.2
Trans Man	350	0.1	11,480	0.2
Non-binary	350	0.1	5,407	0.1
All other gender identities	161	0.06		0.05

4.13.2. **Figure 4-3** displays a comparison of gender identity across neighbouring London boroughs as well as the wider regional area.

²⁰ Housing Benefit and Council Tax Benefit (2013) <https://www.gov.uk/government/statistics/housing-benefit-and-council-tax-benefit-caseload-statistics-published-from-november-2008-to-present> (Accessed: 05/09/2023)

Figure 4-3 - Portion of the LBTH population with a gender identity different from their sex registered at birth²¹.



²¹ Census Maps (2021) <https://www.ons.gov.uk/census/maps/choropleth/identity/gender-identity/gender-identity-4a/gender-identity-different-from-sex-registered-at-birth?lta=E06000023&lads=E09000030> (Accessed: 05/09/2023)

4.14 Baseline Summary

- As of 2021, LBTH have a population of 310,300, with 50.2% being male and 49.8% being female.
- LBTH is considered a relatively youthful borough with 52.9% of the population being aged 16-34.
- The total population in the LBTH area is set to increase across all age groups between 2018 and 2043, with an overall increase of 0.3%
- Under the Equality Act, 20.1% of the population of LBTH are considered to be disabled. Of this, 5.7% are considered to be limited a lot in engaging with day-to-day activities by their disability.
- The largest ethnic group represented in the borough is Asian, Asian British or Asian Welsh at 44.4% of the total population. Within this, the Bangladeshi community are the largest sub group, making up 34.6%.
- The majority of the population in LBTH identify as heterosexual. 4.% reported being gay or lesbian, and 2.5% bisexual.
- The greatest amount of live births in the LBTH area are from women in the age category 30-34, which is in line with London and England.
- The percentage of the population which is married or in civil partnership in LBTH is 8% lower than the regional average and 12.7% lower than the national average.
- 76.6% of the total population in LBTH were classed as economically active compared to 4.6% who were unemployed in 2021.
- Two LSOAs in LBTH fall within the top 10% most deprived neighbourhoods in the UK. These are Lansbury and St. Peter's.
- According to 2021 Census data, only 1% of the LBTH population have a gender identity different from their sex registered at birth.
- As detailed schemes and interventions come forward framed by the New Local Plan, these should be assessed in more detail to understand the potential impacts on specific local populations and vulnerable groups.

5 Impact Assessment

5.1 Introduction

5.1.1. The New Local Plan sets out the vision for future development in the Borough over a 20-year period and includes the planning policies to help achieve this vision. It can do so by identifying locations that are suitable for good growth as well as for conservation and by setting clear guidelines for appropriate land uses, the form and design of development. The aim is to achieve good accessible placemaking that protects and improves resident's health and well-being, provides good quality homes, enhancing the economy and the environment.

Policies

5.1.2. The following proposed policies have been assessed from an equality perspective.

5.1.3. Policies have been split by their themes under the following categories:

- Delivering the Local Plan;
- Homes for the Community;
- Clean Green Future;
- People, Places and Spaces;
- Inclusive Economy and Good Growth;
- Town Centres;
- Community Infrastructure;
- Biodiversity and Open Space;
- Movement and Connectivity; and
- Reuse, Recycling and Waste.

5.2 Assessment methodology

5.2.1. The impact assessment will assess the proposed policies, based on their potential to directly or indirectly cause likely disproportionate impacts on people with the protected characteristics outlined previously. Impacts have also been considered with impact on those with levels of deprivation, as an indicator of socio-economic disadvantage.

5.2.2. Impacts on protected characteristic groups in particular are identified as positive, neutral or negative. Mitigation or recommendations are provided for each policy where this is applicable. Where the impact is deemed positive or neutral, any recommendations will outline how to ensure there is no negative impact or opportunities to further advance equality and inclusivity.

5.2.3. **Table 5-1** below provides the assessment key to the assessment **Table 5-2** below.

Table 5-1 – Assessment Key

Symbol	Impact
+	Positive
0	Neutral
-	Negative

5.3 Assessment Summary

- 5.3.1. Overall, the policies will likely result in positive impacts on protected characteristic group members in the Borough. The policies aim to address a wide range of issues, identified by the key themes above. An overall neutral impact has been given where positive impacts will affect the general public equally and not specifically those from protected characteristic groups.
- 5.3.2. The main protected characteristic groups that will particularly benefit include:
- Age – older people who have reduced mobility and require access to health and other services. Also, children who are likely to benefit from air quality improvements that numerous policies look to achieve;
 - Disability – people with a variety of disabilities will benefit from a more accessible environment; and
 - Deprivation – people from low-incomes who require access to employment, education and housing and people with underlying health issues.
 - Sex, Gender reassignment and Race – women and girls, gender diverse people, and people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.
- 5.3.3. Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:
- Age, Disability and Pregnancy and maternity – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups.
 - Deprivation – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.

5.3.4. The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:

- Religion or belief;
- Sexual orientation; and
- Marriage and civil partnerships.

Table 5-2 – Summary of Policies and Equality Effects

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
Delivering the Local Plan													
DV1 Areas of growth and opportunity within Tower Hamlets	0	0	0	0	0	0	0	0	0	0	0	+ Development will be focussed in highly accessible locations with good links to public transport, cycling and walking networks and town centres. New and improved facilities will likely be accessible and therefore beneficial to all borough residents.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV2 Delivering sustainable growth in Tower Hamlets	0	0	0	+	0	+	0	0	0	0	0	+ Development will be sustainability conscious and considerate of the council's goal of becoming a carbon neutral borough in 2045. Reduced GHG emissions associated with this goal will be beneficial to the respiratory health of the population. <u>Age, Disability</u> + Improvements to air quality and subsequent positive effects on respiratory health will be predominantly beneficial for the elderly, the young and disabled groups in the borough.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV3 Healthy communities	+	0	0	+	0	+	+	0	+	+	+	+ Development will be conscious of potential beneficial or adverse impacts on the population's health. Physical and mental wellbeing of the borough will likely be ensured this way. <u>Age, Disability</u> + Developments will include built and natural environments that are accessible. This will benefit the elderly and disabled groups with accessing open space as well as the public realm. <u>Gender</u>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>+ Improvements to built and natural environments will meet the needs of different genders, this will benefit both male and females within the borough.</p> <p><u>Deprivation, Race, Pregnancy and Maternity</u></p> <p>+ Improving high quality open spaces and community facilities will provide access to those who may currently be without access to these facilities.</p> <p>+ High quality open space and community facilities will improve opportunities for social interaction.</p>	
DV4 Planning and construction of new development	0	0	0	-	0	-	-	0	0	-	- High levels of development are set to occur in already densely inhabited areas of the borough. While the policy aims to ensure development will have minimal impact on the local environment and communities, it is likely that ongoing construction will have adverse effects on nearby residential receptors through noise and dust pollution.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV5 Developer contributions	0	0	0	0	0	0	0	0	0	0	Additional funds to the improvement of the environment and infrastructure in the borough will ensure sustainable development as set out in the Local Plan is being realised. This policy will therefore be beneficial to all members of the community in the borough.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV6 Promoting social value	+	+	0	0	+	0	0	0	+	+	<p>+ Added social value from development will bring additional community, culture and diversity benefits.</p> <p>+ Religion/ belief and Race</p> <p>Development will support social inclusion and equal opportunity within the borough which will positively impact community cohesion.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
DV7 Utilities and digital connectivity	0	0	0	+	0	+	0	0	0	0	<p>Improvements to utility infrastructure for new developments will be beneficial to all borough residents.</p> <p><u>Age</u></p> <p>+ Improved broadband connections will be beneficial to elderly people suffering from social isolation. Greater opportunities to connect with family and friends virtually will generate positive mental health impacts. Faster broadband will also be beneficial for young people especially students who require the utility for university work.</p> <p><u>Age, Disability</u></p> <p>+ Enhanced efficiency of utilities such as heating and water will bring positive health impacts for vulnerable groups including the elderly and disabled.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV8 Site allocations	0	0	0	0	0	0	0	0	0	0	<p>The application of all Local Plan polices on site allocations containing development proposals will be beneficial to all groups in the borough.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
Homes for the Community												
HF1 Meeting housing needs	+/-	0	0	+	0	+	+	0	+/-	+/-	<p><u>Age, Deprivation, Disability</u></p> <p>The policies intention to meet the housing needs of the borough through ways that ensure the creation of mixed, inclusive and balanced communities will be beneficial to the general population. This will benefit those on lower incomes through provision of more housing, which will reduce competition in the housing market. Additionally there will be more availability</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>of social and affordable housing for those on lower incomes.</p> <p>Additionally, ensuring a mix of development size will ensure there is appropriately sized development for different occupier groups, who may need more or less space depending on their needs.</p> <p><u>Race</u></p> <p>The prioritisation of proposals for gypsy and traveller communities will benefit these communities.</p> <p><u>Deprivation, Gender and Race</u></p> <p>-There is potential for low levels of engagement from the community in which estate regeneration schemes are proposed. Areas in need of social housing are where factors such as low incomes and educational barriers and additional pressures such as second jobs and single-parent households are more common. Residents may be less inclined or able to engage with consultation due to pressure from other aspects of life. There could be various other reasons for low engagement, such as language barriers or physical and informational inaccessibility.</p>	
HF2 Affordable housing and housing mix	0	0	0	0	0	0	0	0	0	+	<p><u>Deprivation</u></p> <p>+ The policies target to maximise the delivery of affordable housing with a target of 50% of all new homes to be genuinely affordable will be beneficial to low-income groups who are unable to afford predominant housing availability throughout the borough. The emphasis on affordable family sized housing with a view to combat overcrowding in the borough is also beneficial to families with children.</p>	No mitigation measures have been outlined for this policy. .

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
HF3 Protection of existing housing	0	0	0	0	0	0	0	0	0	0	The policies intention to protect existing and safeguard the future supply of self-contained homes across the borough will be beneficial to the general population.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
HF4 Supported and specialist housing	0	0	0	+	0	+	0	0	0	0	The provision of specialist housing to offer supported living to those with additional needs will support a range of protected characteristics in the borough. The policy supports those who are homeless through the provision of shelters and transitional housing and older people through provision of nursing homes and care homes. Supported living will benefit these groups by ensuring their care and protection.	No mitigation measures have been outlined for this policy.
HF5 Gypsy and traveller accommodation	0	0	0	0	0	0	0	0	+	0	Gypsies and travellers are considered under this theme through safeguarding of the existing gypsy and traveller site at Old Willow Close. This population group will benefit from additional safety measures to their place of occupancy.	Should any additional accommodation be required as a result of improvements to the existing site the council will need to consider appropriate locations for this to avoid illegal sittings. LBTH are currently awaiting the outcomes of the Greater London Authorities Gypsy and Traveller Accommodation Needs Assessment
HF6 Purpose-built student accommodation	0	0	0	+	0	+	0	0	0	0	<u>Age</u> + The policy supports the development of student accommodation in close proximity to its relevant higher education institution, and where it does not be detrimental to the cohesiveness of communities. This will be particularly beneficial to the student population in the borough as well as the long-term state of higher education and local economy in the borough.	Accommodation such as student accommodation can be conducive to noise pollution. Accommodation should be appropriately located so as to minimise adverse effects on other residential receptors.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<u>Disability</u> + It is also noted that 10% of rooms should be designed to be accessible, in line with the London Plan 2021. - An increased prevalence of student accommodation will likely result in increased noise pollution in the surrounding area. This will have adverse effects for the wellbeing of all residents	
HF7 Large-scale purpose-built shared living	0	0	0	+	0	0	0	0	0	-	<u>Age</u> + There are benefits to those occupying communal residences, particularly older people living on their own, in terms of reduction of social isolation and increased participation in activities which in turn has health benefits. <u>Deprivation</u> - The development of large-scale purpose-built shared living has the potential to compromise the generation of affordable housing throughout the borough. This will be disadvantageous to lower income groups who rely on the provision of affordable housing for their residential needs.	Large-scale buildings often have potential to infringe on the residential amenity of an area. Mitigation measures should be put in place to ensure the built environment does not have adverse effects for any population group. Large-scale buildings must also contain accessibility features in order for those who are disabled or with mobility impairments to successfully reside here.
HF8 Housing with shared facilities (houses in multiple occupation)	0	0	0	+	0	0	0	0	0	+	<u>Age</u> + HMOs are a beneficial tenancy options for younger residents who are unable to or choose not to live in traditional housing. <u>Deprivation</u> + HMOs also offer a shared room rate housing benefit. This is especially beneficial to low-income groups who are reliant on affordable means of housing.	No mitigation measures have been outlined for this policy.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
HF9 Housing Standards and Quality	0	0	0	+	0	+	+	0	0	+	<p><u>Age, Disability, Pregnancy and Maternity, Deprivation</u></p> <p>+ Safe living conditions may be of particular importance to older people, disabled people and expectant mothers who inherently experience raised wellbeing requirements. Those on lower incomes are more likely to be living in social or rented accommodation and will benefit from well designed and maintained housing stock.</p>	No mitigation measures have been outlined for this policy.
Clean Green Future												
CG1 Mitigating and adapting to a changing climate	0	0	0	+	0	+	0	0	0	0	<p>This policy will contribute to improving climate resilience in the borough, and therefore brings benefits for all members of the public.</p> <p><u>Age, Disability</u></p> <p>+ Improvements to air quality through this policy will be particularly beneficial to disabled groups, the young and the elderly.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG2 Low energy buildings	0	0	0	+	0	0	0	0	0	+	<p><u>Age</u></p> <p>+ Provision of low energy and energy efficient buildings will help to support better quality housing stock now and for future first time buyers.</p> <p><u>Age, Disability</u></p> <p>+ Provision of low energy buildings will also help to improve residents' health, particularly elderly and disabled residents, by reducing exposure to cold and air pollutants. Younger groups will also experience health benefits from the development of buildings and subsequent reduction in health damaging environmental factors such as mould.</p> <p><u>Deprivation</u></p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>+ This policy also presents current energy/ cost savings for residents, especially important for those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p>	
CG3 Low carbon energy and heating	0	0	0	+	0	+	0	0	0	+	<p><u>Deprivation</u></p> <p>+ Low carbon energy and heating will contribute to more energy efficient homes and reduce expenditure on energy bills. This will benefit everyone, but especially those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p> <p><u>Age, Disability</u></p> <p>+ Provision of low carbon energy and heating will also help to improve residents' health, particularly elderly and disabled residents, by reducing exposure to cold and air pollutants.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG4 Embodied carbon, retrofit and the circular economy	0	0	0	+	0	0	0	0	0	+	<p><u>Deprivation</u></p> <p>+ Retrofitting existing housing stock will contribute to more energy efficient homes and reduce expenditure on energy bills. This will benefit</p>	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>everyone, but especially those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ Retrofitting with a view for longevity will also aid in reducing maintenance costs associated with housing.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p> <p><u>Age</u></p> <p>+ Retrofitted properties will help to support better quality housing stock now and for future first time buyers.</p>	Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
CG5 Overheating	0	0	0	+	0	+	0	0	0	0	<p><u>Age, Disability</u></p> <p>+ Climate change is likely to result in increased heating events, therefore the prevention of overheating through this policy is essential, especially for elderly, young, and disabled residents who are vulnerable to overheating.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG6 Managing flood risk	0	0	0	0	0	0	0	0	0	0	<p>+ This policy will contribute to improving climate resilience in the borough through consideration of flood risk in development, and therefore brings benefits for all members of the public, especially those residing in flood zones.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG7 Sustainable drainage	0	0	0	0	0	0	0	0	0	0	<p>No protected groups are identified as specifically impacted.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
CG8 Water efficient design	0	0	0	0	0	0	0	0	0	0	<p>+ This policy is likely to result in indirect positive effects on water quality due to the outlined measures to minimise surface runoff from sewers. This may indirectly improve local water quality on a small scale, bringing minor benefits to the entire borough.</p> <p>+ Ensuring blue spaces like Lea River Park are well-designed and accessible will maximise opportunities for public use and enjoyment for all borough residents.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG9 Air quality	0	0	0	+	0	+	+	0	0	0	<p>+ The policy involves encouragement of sustainable movement patterns, including the use of public and active transport modes. Those engaging in active transport will likely experience physical and mental health benefit as a result.</p> <p>+ The policy also contributes to indirect positive effects upon biodiversity through improvements to air quality. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Age, Disability, Pregnancy/maternity</u></p> <p>+ Young children, older people, pregnant women, and those with respiratory and underlying health conditions are particularly sensitive to changes in air quality and will benefit from improvements more than other groups.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG10 Noise and vibration	0	0	0	+	0	+	0	0	0	0	<p>+ This policy will add to the enjoyment of the community for all residents.</p> <p>+ The policy includes measures to minimise construction disturbance which is likely to have minor positive indirect effects on local biodiversity. Improved environmental</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Age, Disability</u></p> <p>+ People with autism can be especially sensitive to changes in noise. This group will especially benefit from noise mitigation. Children and young people could also be affected if work is undertaken in the vicinity of education facilities.</p>	
CG11 Contaminated land	0	0	0	0	0	0	0	0	0	0	+ This policy will improve the quality of land in the borough, and therefore brings benefits for all members of the public.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
People, Places and Spaces												
PS1 Design- and infrastructure-led approach to development	+	0	+	+	0	0	+	0	0	0	<p><u>Sex and Gender, Gender reassignment</u></p> <p>+ The policy outlines community engagement measures to ensure development suits community needs, and gender inclusive design.</p> <p><u>Age, Pregnancy/Maternity</u></p> <p>+ The policy contributes positive impacts to Tower Hamlets as it supports the growing population of the borough.</p> <p>- An increase in housing density through this policy will often support the development of tall buildings. High rise living can be conducive of social isolation and present barriers to suitable open space for all residents, resulting in poor mental health outcomes.</p>	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS2 Tall Buildings	+	0	0	0	0	+	-	-	0	0	<p>+ This policy will benefit the entire borough community.</p> <p>+ Indirect improvements to mental health are made through the communal open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.</p> <p>+ The provision of communal open space may enhance local natural capital. The policy also requires development to have no adverse effect on biodiversity in the local area, preserving species and habitats. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Disability</u></p> <p>+ Improvements to the accessibility of high rise developments to those with disabilities is likely to improve living standards and reduce social isolation for those who are disabled and living in high rise developments.</p> <p><u>Sex and Gender</u></p> <p>+ The consideration of gender-inclusive design is likely to improve feelings of safety within high rise developments.</p> <p><u>Marriage and civil partnership</u></p> <p>- High rise living can be a socially isolating experience, particularly for those living alone without a partner or family. Limited socialisation opportunities are presented by such living arrangements, with residents subsequently feeling a lack of social support and sense of belonging within the community.</p>	<p>Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.</p> <p>Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.</p>

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p><u>Pregnancy/maternity</u></p> <p>- There is a high perception of anti-social behaviour in association with communal areas of tall buildings. A low sense of control over the communal setting of one's residence can be linked to poor mental health outcomes. This is particularly significant for parents with young children who may feel the safety of their children is compromised by their residential location.</p> <p>-/+ High rise living can promote barriers to suitable open space for parents with young children. Point J of this policy should go some way to alleviate this risk through the provision of high quality private communal open space, play areas and public realm which occupants of the building can use.</p>	
PS3 Securing design quality	0	0	0	+	0	+	0	0	0	0	<p>+ This policy is likely to result in improved housing, particularly through improvements to privacy for residents, creating habitable rooms and creating residential resilience to overheating. These aspects will help to support better quality housing stock now and for future first time buyers.</p> <p><u>Disability, Age</u></p> <p>+ Accessible and adaptable buildings will improve access for elderly and disabled users who may struggle to move within buildings.</p> <p>+ The policy also ensures the health and wellbeing of vulnerable users, this includes a variety of groups, however predominantly elderly, disabled, or those with long term health conditions.</p>	Securing design quality should not come at the expense of affordable housing, in order that first time buyers and those on lower incomes remain able to buy into the property market and not be priced out, or not have access to quality development.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS4 Attractive streets, spaces and public realm	+	0	0	0	0	0	0	0	0	0	<p>+ This policy promotes a range of public spaces for community use within developments, improving the local facilities available for growing communities in Tower Hamlets. This policy will therefore benefit the entire borough community.</p> <p><u>Sex and Gender</u></p> <p>+ The policy also improves safety and reduces the fear of crime through providing well-lit routes at night time, an aspect that is of particular importance to women at night.</p>	Street features and public realm that are frequented by vulnerable groups such as children and low-income groups should consider avoiding locating nearby advertisement content including hot food takeaway and betting.
PS5 Creating inclusive places	+	0	+	+	+	+	+	0	+	0	<p><u>Sex and Gender, Gender Reassignment</u></p> <p>+ This policy involves lighting and signage measures, as well as design to make areas safe for all genders, particularly reducing the fear of crime. Resultant positive effects are through improvements to equalities, ensuring all genders are able to access community spaces equally.</p> <p><u>Sex and Gender, Sexual Orientation, Disability, Race</u></p> <p>+ The policy aims to involve a number of social groups within the design process and utilise co-design. This will improve the nature of spaces and ensure they reflect the needs of the community.</p> <p><u>Age</u></p> <p>+Improving seating in open spaces will provide opportunities for the elderly to sit and rest, improving accessibility of open spaces.</p>	The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.
PS6 Heritage and historic environment	0	0	0	+	0	+	+	0	0	0	<p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific

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											<p>personal sense of place can build with time and association with a particular area.</p> <p><u>Age, Disability, Pregnancy/maternity</u></p> <p>+ Improvements to uneven surfaces will improve the accessibility of historic locations to those who may struggle with historic surfaces, such as the elderly, disabled users, and those with mobility aids, as well as parents with pushchairs.</p>	information once development sites have come forward.
PS7 World heritage sites	0	0	0	+	0	0	0	0	0	0	<p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A personal sense of place can build with time and association with a particular area.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
PS8 Shaping and managing views	0	0	0	0	0	0	0	0	0	0	<p>+ The maintenance of local landscape and views associated with this policy will benefit the entire borough community, particularly not detracting from people's wellbeing and mental health.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
PS9 Shopfronts	0	0	0	0	0	+	0	0	0	0	<p>This policy aims to benefit the whole community by promoting a positive visual impact of shopfronts on the street and improving the economic diversity within the Borough at the same time. No protected groups are identified as specifically impacted.</p> <p>+The requirement of shopfronts to not be excessive or visually discordant, including the discouragement of neon and electronic displays is particularly sensitive to those with neurodivergence.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS10 Advertisements, hoardings, and signage	0	0	0	0	0	-	-	0	0	0	<u>Disability and pregnancy and maternity</u> - Free standing advertisements can present an obstacle on the footway for disabled people as well as parents using pushchairs.	Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent. Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered. Well-designed advertisement can aid in reducing sensory overload for the neurodivergent population of the borough. Enhancement of appearance should not compromise the usability of neurodivergent people.
PS11 Siting and design of telecommunications infrastructure	0	0	0	0	0	0	0	0	0	0	No protected groups are identified as specifically benefiting or disadvantaged by this policy.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
Inclusive Economy and Good Growth												
EG1 Creating investment and jobs	0	0	0	0	0	0	0	0	0	+	<u>Deprivation</u> + The policy provides improved job opportunities for all groups of the working population, including those with current low levels of education. With new employment prospects low-income groups in the borough will have greater opportunities to earn and save disposable income. Increased opportunities and new income will likely reduce levels of stress and anxiety associated with the rising cost of living.	Jobs creation must be evenly distributed across space within the borough to ensure all groups are able to easily access employment.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
EG2 New employment space	0	0	0	+	0	0	0	0	0	+	<p>+ New employment spaces will encourage outside investment and increase the number of jobs available in the borough, boosting the local economy. This policy will benefit the entire borough community.</p> <p><u>Age, Deprivation</u></p> <p>+ New employment spaces locating along major public transport routes with good accessibility is particularly beneficial to young and low income groups who likely will not have access to private vehicles to access employment.</p>	New employment spaces should be a diverse and equal mix of office space and spaces for small businesses to thrive.
EG3 Affordable workspace	0	+	0	+	0	0	0	0	+	0	<p><u>Religion, Race</u></p> <p>+ Affordable workspaces will support the generation and maintenance of small businesses, likely providing opportunities for different cultures and improving equalities in the borough overall.</p> <p><u>Age</u></p> <p>+ Affordable workspaces are also beneficial to young people setting up SME's who have a low income to do so.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
EG4 Loss and redevelopment of employment space	0	0	0	0	0	0	0	0	0	0	<p>All community members will benefit from the preservation of work spaces and subsequent maintenance of employment opportunities.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
EG5 Railway Arches	0	+	0	0	0	0	0	0	+	+/-	<p>+ This policy includes measures to ensure the accessibility to the railway arches by walking and cycling must be included within developments. This contributes to positive effects on accessibility due to walking permeability through the area. By ensuring accessibility of active travel, the overall</p>	The accessibility of disabled groups must also be considered when ensuring the walkability of the area. Footpaths must not be obstructed to allow space for wheelchair users to travel through.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
											<p>health of the community in the borough will likely improve.</p> <p><u>Deprivation</u></p> <p>+ This policy allows those who rely on active and public transport modes, such as those on low incomes, to reach the area.</p> <p>- By supporting the Railway arches provision of low-cost work spaces that fall outside of District Centres and Central Activity Zones (CAZ) those who are reliant on these spaces for work will not be subject to the same benefits that may be generated by investment in the CAZ as those who can afford workspaces within the designations.</p> <p><u>Religion, Race</u></p> <p>+ Preservation of the railway arches for their varying cultural uses is beneficial to ensuring diversity and equality are upheld in the borough.</p>		
EG5 Data centres	0	0	0	+	0	0	0	0	0	0	<p><u>Age</u></p> <p>+ Improved broadband connections will be beneficial to elderly people suffering from social isolation. Greater opportunities to connect with family and friends virtually will generate positive mental health impacts. Faster broadband will also be beneficial for young people especially students who require the utility for university work.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.	
Town Centres													
TC1 Supporting the network and hierarchy of centres	0	0	0	+ / -	0	0	0	0	0	0	+	<p>Improvements to centres will likely suit community needs, benefitting the entire borough community. A thriving, diverse community will also help to reduce social isolation for all borough residents.</p>	Developments should seek to improve the public realm.

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											<p><u>Age</u></p> <p>+ Boosted vitality and improvement to the night time economy provides spaces for socialisation, entertainment and culture that young and middle aged groups will directly benefit from.</p> <p><u>Age</u></p> <p>-There is potential for negative effects on the mental wellbeing of local residents, especially the elderly, as a result of the night time economy, and noise during night time hours.</p> <p><u>Deprivation</u></p> <p>+ The policy directly provides opportunity for employment in retail and hospitality across Tower Hamlets, including for night-time workers as a result of the night time economy. A large proportion of town centres in Tower Hamlets provide night time economy areas, improving job opportunities, especially for low-income groups seeking employment.</p>	
TC2 Protecting the diversity, vitality and viability of town centres	0	+	0	0	0	0	0	0	0	0	<p>+ Preserving town centre usage is likely to attract visitors, increase footfall and boost the economy of town centres. This policy will therefore benefit the entire borough community.</p> <p><u>Religion, Race</u></p> <p>+ Diversity preservation will ensure that different communities in the borough have their needs met with specific services and amenities.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
TC3 Town centre uses outside centres	0	0	0	0	0	0	0	0	0	0	<p>The policies aim to direct new retail development towards existing centres will likely result in a failure to meet growing demand for retail in areas outside of Metropolitan, District and Neighbourhood Centres. Lowered access to</p>	Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres and is necessary to meet the immediate convenience needs of local people and/or support the

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												services will be disadvantageous to the wellbeing of residents in these areas.	function of designated employment locations.
TC4 Markets	0	0	0	0	0	0	0	0	+	0	<p><u>Race</u></p> <p>+ Preserving markets ensures a cultural diversity in the borough's townscape and economy, benefitting the entire borough community.</p>	Developments should seek to improve the public realm.	
TC5 Food and drink	0	0	0	+	0	0	0	0	0	0	<p>New eating and drinking facilities are likely to provide places for socialisation which will improve the mental wellbeing of all borough users.</p> <p><u>Age</u></p> <p>+ Under this policy, proposals for hot food takeaway must not be within 400 metres walking distance from an existing or proposed school and/or local authority leisure centre. This inclusion will ensure the physical health and wellbeing of school aged children throughout the borough.</p>	This policy requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users.	
TC6 Entertainment uses	0	+	0	+	0	0	0	0	0	0	<p>+ Commercial leisure businesses can act as attractors and support the vitality and viability of town centres. Increase footfall will likely boost the economy of town centres, benefitting the entire borough community.</p> <p><u>Age, Religion/belief</u></p> <p>+ Commercial businesses will not be located in close proximity to a school, sensitive community, or cultural facilities including places of worship. Sensitive receptors making use of these facilities will not be adversely affected by the new presence of commercial businesses.</p>	<p>Developments should seek to improve the public realm.</p> <p>Hot food takeaway and gambling premises should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.</p>	

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
TC7 Evening and night-time economy	+	0	+	+	0	+	0	0	0	+	<p><u>Age, Disability</u></p> <p>+ People can be especially sensitive to noise disturbance due their age or having disabilities or neurodivergence, such as autism. This policy will allow the planning system to mitigate noise impacts of a vibrant evening economy.</p> <p><u>Sex and Gender, Race</u></p> <p>+ A vibrant evening economy requires additional safety measure to be put in place. This could help to protect people vulnerable to crime at night such as women, LGBTQ+ people and people with different ethnicities. It is noted that the policy will only allow proposals to be considered where there is a high level of public transport accessibility.</p> <p><u>Deprivation</u></p> <p>+ Facilitating the evening economy will bring economic benefits to the borough in terms of employment and income.</p>	The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis.
TC8 Short-stay accommodation	0	0	0	0	0	0	0	0	0	+	<p>+ This policy promotes visitors to Tower Hamlets and is likely to improve the visitor economy, benefitting the entire borough community, without undermining housing allocation, and therefore reducing housing availability.</p> <p>- The policy states that development proposals for short-stay accommodation must not compromise the supply of C3 self-contained homes only. Alternative housing including family-sized homes and affordable housing may therefore be threatened by short-stay accommodation development.</p>	Ensure accessibility standards are adhered to in short-stay accommodation.

Community Infrastructure

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
C1 Supporting community facilities	0	0	0	+	0	0	+	0	0	0	<p>+ The policy outlines the maintenance and enhancement of community facilities, including healthcare and sports and leisure facilities. This will likely improve physical health through encouraging physical activity, as well as improving mental wellbeing through improving spaces for socialisation and encouraging activity for all community members. This policy will encourage a sense of community and reduce social isolation by maintaining existing facilities, and prioritising new development in accessible locations.</p> <p><u>Age, Pregnancy/Maternity</u></p> <p>+ Older people and pregnant women or parents will particularly benefit from improved provision of and support from health and social care facilities, pharmacies.</p>	The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities.
C2 Existing community facilities	0	0	0	+	+	0	0	0	0	0	<p>+ The retention and enhancement of existing communities, as well as the use of temporary facilities while existing facilities are closed for extended periods of time, will be beneficial to all borough community members.</p> <p><u>Disability</u></p> <p>+ This policy involves the development of accessible, inclusive new facilities, including allowing public access. This is likely to improve access to facilities to all groups of the public, including disabled users.</p> <p><u>Age</u></p> <p>+ Where school extensions are proposed and the development of play spaces is included, young children will experience positive mental and physical health benefits.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
C3 New and enhanced community facilities	0	0	0	+	0	0	0	0	+	+	<p>+ This policy will bring about benefits for the entire borough community in the form of improved physical health through providing new community facilities and leisure facilities. This also improves mental wellbeing through new social facilities.</p> <p><u>Age</u></p> <p>+ New early education and care facilities will also be located in areas of acceptable air quality, indirectly improving health. This is particularly of note as young people and older people are most at risk of respiratory illnesses such as asthma due to poor air quality.</p> <p><u>Race</u></p> <p>+ Improvements to services and access to them is particularly important to the Bangladeshi community within the borough, who demonstrate a prioritisation of improved services and activities for young people, access to a place of worship, access to healthy eating programmes and public transport facilities like bus stations.</p>	New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility.
C4 Public houses	0	0	0	+	0	0	0	0	0	0	<p>+ This policy preserves public houses and provides beneficial community spaces and socialisation venues for the entire local population.</p> <p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A personal sense of place can build with time and association with a particular area or venue, and so the preservation of public houses is beneficial. Young people, especially students who may also experience loneliness and social isolation will also experience positive effects to socialisation opportunities through this policy.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											- No mitigation against additional noise pollution as a result of Public Houses is set out by this policy, and so adverse effects on nearby residential receptors can be expected.	
C5 Arts and culture facilities	0	0	0	0	0	0	0	0	0	0	+ Preserving arts and culture facilities ensures diversity is maintained and enhanced in the borough, benefitting all community members.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
Biodiversity and Open Space												
BO1 Green and blue infrastructure	+	0	0	+	0	0	+	0	0	+	<p>+ The community will benefit from reducing pollution, improving air quality, enhancing biodiversity, screening noise, improving natural drainage, reducing flood risk, providing benefits to mental and physical health. The promotion of space for cultural activities under this policy will also be beneficial to community cohesion throughout the borough.</p> <p><u>Deprivation</u></p> <p>+ Access to open space is particularly beneficial to low income groups who may not have access to privately owned green space.</p> <p><u>Pregnancy and maternity</u></p> <p>+ Green spaces, particularly those with play spaces included are also beneficial to parents with young children as it enables them to access opportunities for both physical activity and socialisation.</p> <p><u>Sex and Gender, Age</u></p> <p>+ Inter-generational open space with a range of activity spaces included are beneficial to children</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											and young people, as well as adults and the elderly, providing spaces for various sport types and increasing physical activity opportunities. Additionally, designing spaces with women and girls in mind will likely increase the feelings of safety in open spaces and encourage physical activity and socialisation in these spaces.	
BO2 Open spaces and the green grid networks	0	0	0	+	0	+	+	0	+	+	<p><u>Age</u></p> <p>+ Preservation and creation of open space will benefit younger people by providing quality recreational space.</p> <p><u>Disability</u></p> <p>+ Green spaces provide particular benefits to people seeking to use these areas for management mental health and/or stress.</p> <p><u>Pregnancy/maternity</u></p> <p>+ Quality green space is important for parents with push chairs. Play areas benefit this group by providing a safe recreational space for children.</p> <p><u>Deprivation</u></p> <p>+ High quality parks and open spaces will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p> <p><u>Race</u></p> <p>+ Access to open space is especially important to the Bangladeshi community, who currently are the most likely group in the borough to say that they do not have access to spaces with opportunities for play and recreation, the main reason being the lack of parks and green spaces in their local area.</p>	<p>New parks and open spaces should be accessible to all members of the public. Design should especially consider the safety of women and young girls by including appropriate lighting, accessible pathways and access and egress points. The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.</p>

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
BO3 Water spaces	0	0	0	0	0	0	0	0	0	0	+ Improved public access to high quality water spaces will be beneficial to the mental wellbeing of the community in the borough.	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
BO4 Biodiversity and access to nature	0	0	0	0	0	+	0	0	0	+	<p>This policy aims to provide benefits to all members of the public.</p> <p><u>Disability</u></p> <p>+ The maintenance and enhancement of a greener landscape ecological value can add to sense of place. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas, particularly people seeking to manage mental health and/or stress.</p> <p><u>Deprivation</u></p> <p>+ A greener urban landscape will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p>	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
BO5 Urban greening	0	0	0	0	0	0	0	0	0	+	<p>Additional planting around the borough will improve the environmental surroundings, contributing to improved mental wellbeing for all community members.</p> <p><u>Deprivation</u></p> <p>+ A greener urban landscape will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p> <p>+ The provision of allotments will be particularly beneficial to low income groups who do not have access to private gardens with which to grow food crops for healthy living purposes.</p>	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
BO6 Play and recreation spaces	0	0	0	+	0	+	+	0	0	+	<p><u>Pregnancy/maternity</u></p> <p>+ Quality recreational spaces are important for parents in entertaining and socialising children. Play areas benefit this group by providing a safe recreational space for children.</p> <p><u>Age, Disability</u></p> <p>+ Play is an important component of the physical and mental development of children. Creating safe spaces for children to socialise and explore will benefit the overall health of the next generation in the borough. This includes providing spaces for disabled children to play and utilise play equipment, as well as providing quiet seating and visual aids, ensuring disabled children are able to utilise play spaces and socialise.</p> <p><u>Deprivation</u></p> <p>+ Providing play space nearby to community amenities will benefit people living in high density residential areas, or areas of high deficiency to play space, who may not have access to private gardens or outside space.</p>	<p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>The policy might encourage business and facilities to open up in play and recreational spaces as well as ensure active travel routes increase the busyness of parks. A busier, more vibrant environment will lessen the prevalence of idle parks that promote fear in women, especially mothers.</p>
BO7 Food Growing	0	0	0	0	0	0	0	0	0	+	<p>+ Food growing can generate opportunities for socialisation and cross-cultural engagement in the community, benefitting the mental wellbeing of all those taking part.</p> <p><u>Deprivation</u></p> <p>+ Community food growing may be helpful to those living on low incomes in the area.</p> <p>+ The provision of allotments will be particularly beneficial to low income groups who do not have access to private gardens with which to grow food crops for healthy living purposes.</p>	<p>Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.</p>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
Movement and Connectivity												
MC1 Sustainable transport	+	0	0	0	0	+	0	0	+	+	<p>+ The encouragement of active travel results in direct positive effects for the physical and mental health of the population. A modal shift away from public transport will also likely reduce air pollution, indirectly positively impacting physical health.</p> <p><u>Disability</u></p> <p>+ This policy is likely to improve access to all users, including those with mobility issues.</p> <p><u>Deprivation</u></p> <p>+ Improving public and active transport also allows those on low incomes to access further areas of the Borough. The policy aims to reduce severance and increase permeability across the Borough. Greater ease of transport will improve employment opportunities for those unable to afford private transport in the borough.</p> <p><u>Sex and gender, Race</u></p> <p>+ Improvements to the safety and accessibility of active transport modes such as cycling will encourage uptake by less frequent users such as women and ethnic groups.</p>	<p>Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that Cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users.</p> <p>In order to successfully encourage the uptake of public transport, bus stops should ideally be located so that nobody in the neighbourhood is required to walk more than 400 metres from their home as per the governments Guide to Best Practice on Access to Pedestrian and Transport Infrastructure.</p>
MC2 Active travel and healthy streets	+	0	0	+/-	0	+/-	+	0	+	+	<p><u>Age</u></p> <p>+ Older people could particularly benefit from easier active travel, due to the associated health benefits.</p> <p><u>Disability</u></p> <p>+ Better connectivity between footways/cycleways and public transport will particularly benefit people who are unable to cycle.</p>	<p>Active travel infrastructure should be accessible and inclusive.</p> <p>Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with</p>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p><u>Age/ Disability</u></p> <p>- Implementing measures that encourage reduced car dependency could impact on the ability of those with limited mobility to access services.</p> <p>+ Segregating pedestrian and cycle lanes will improve the safety of users, particularly those who may be hard of hearing or may not be able to see other users. This will improve safety for these users, particularly elderly and disabled users and parents with pushchairs.</p> <p><u>Deprivation</u></p> <p>+ Active travel brings benefits that add to the general health and wellbeing of the community.</p> <p><u>Sex and gender, Race</u></p> <p>+ Improvements to the safety and accessibility of active transport modes such as cycling will encourage uptake by less frequent users such as women and ethnic groups.</p>	<p>charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p>
MC3 Impacts on the transport network	+	0	+	+	0	+	0	0	0	0	<p>This policy considers improvements to air quality through new developments, generating positive impacts on the respiratory health of the boroughs population.</p> <p><u>Sex and gender, Gender reassignment, Age, Disability</u></p> <p>+ The inclusion of both transport assessments and Active Travel Zone (ATZ) assessments will consider safety and night-time uses of active travel routes. This will assist in developing routes where users feel safe, and encourage utilisation of these routes for vulnerable groups, including women and girls, gender diverse people, children and older people, and people with disabilities.</p>	<p>No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.</p>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
MC4 Parking and permit-free	0	0	0	-/+	0	-/+	-/+	0	0	-/+	<p>This policy involves the provision of electric vehicle (EV) charging in new developments. Encouragement of sustainable vehicles usage is likely to reduce GHGs from private vehicles, improving air quality and the overall respiratory health of the population. Provision is also supported for disabled parking.</p> <p><u>Deprivation</u></p> <p>+ The policy also includes requirements for secure cycle parking which is likely to reduce bicycle theft in Tower Hamlets. This is beneficial for those who's only accessible mode of transport as a result of low-income is cycling.</p> <p>- This policy supports the maximisation of parking in some locations with low transport accessibility. This could see the increase in private vehicle use in certain locations, rather than support improvements to sustainable transport. This may disproportionately affect lower income groups.</p> <p><u>Age and Disability and Pregnancy and maternity</u></p> <p>- EV charging can present barriers to the elderly and those with disabilities, through trailing cables, parking bays being too narrow.</p> <p>- The policy outlines car free development and a reduction in residential car parking within areas of good public transport accessibility. This may restrict accessibility for those with disabilities parents with pushchairs who may require use of a</p>	<p>It is recommended that the Purple Badge Scheme is implemented to ensure there will be no negative impacts on protected groups, such as disabled people.</p> <p>Cycle parking should be high-quality and suitable for a range of cycles including adapted cycles and cargo bikes as per the London Cycling Design Standards.</p> <p>Management should protect priority bays to maintain accessibility for protected groups.</p> <p>EV charging points should adhere to the British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022)²².</p>

²² British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022) [online] available at: <https://www.bsigroup.com/en-GB/standards/pas-1899/>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
												car and therefore limit accessibility, disproportionately affecting these groups.	
MC5 Sustainable delivery, servicing and construction	0	0	0	0	0	0	0	0	0	0	0	This policy considers improvements to air quality through new developments using sustainable freight through water, rail and road (zero emission vehicles), generating positive impacts on the respiratory health of the boroughs population.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
Reuse, Recycling and Waste													
RW1 Managing our waste	0	0	0	0	0	0	0	0	0	0	+	<u>Deprivation</u> + Maximising the capacity and efficiency of waste facilities will improve the streetscape around flats and higher density residential areas. This could bring benefits to aesthetics, accessibility and perception of crime by reducing street waste storage areas.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
RW2 New and enhanced waste facilities	0	0	0	0	0	0	0	0	0	0	0	+ The integration of new waste facilities into local landscape settings will likely result in minor positive effects on landscape setting. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.	New waste facilities to be constructed and utilise existing brownfield sites to reduce negative biodiversity and landscape impacts associated with new development.
RW3 Waste collection facilities in new development	0	0	0	0	0	0	0	0	0	0	0	+ Through improved collection systems and encouragement of recycling, reductions in overall waste generation brought about by this policy is likely to bring indirect minor improvements to the landscape and biodiversity of the borough. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.	Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management.



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London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix I: Health Impact Assessment



London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix I: Health Impact Assessment

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1 Introduction

1.1 Overview

- 1.1.1. The London Borough of Tower Hamlets (LBTH) is currently preparing a New Local Plan (NLP), which will replace the Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits adopted in 2020¹. The Tower Hamlets NLP will comprise five sub-areas, as planning functions for the London Legacy Development Corporation (LLDC) in the north-east of LBTH are expected to be returned to LBTH in 2024. The sub-areas are City Fringe, Central Area, Lower Lea Valley, Isle of Dogs and South Poplar, and Hackney Wick and Fish Island (current LLDC area).
- 1.1.2. An Integrated Impact Assessment (IIA) has been undertaken to ensure that sustainability aspects are incorporated into the NLP. The IIA enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. This process also helps to simplify outcomes and recommendations for policymakers.
- 1.1.3. As part of the IIA, a Health Impact Assessment (HIA) has been undertaken to assess the impacts of the NLP on human health in LBTH, and the likely effects on health outcomes in the local population.

The outcomes of the HIA have informed the IIA.

1.2 Local Plans

- 1.2.1. Section 3 of the National Planning Policy Framework (NPPF)² requires that each local planning authority should prepare a local plan for its area, which guides decisions on future development proposals and addresses the needs and opportunities of the area.
- 1.2.2. Topics that local plans usually cover include housing, employment and infrastructure. They also identify where development should take place and areas where development should be restricted. Once in place, local plans become part of the statutory development plan, which is the starting point for determining local planning applications.
- 1.2.3. The NPPF states that the '*planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities*'.

¹ Tower Hamlets Council (2020) Tower Hamlets Local Plan 2031. Available at: https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH_Local_Plan_2031_accessibility_checked.pdf

² Ministry of Housing, Communities and Local Government Framework, National Planning Policy Framework, 2021 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

1.3 Integrated Impact Assessment

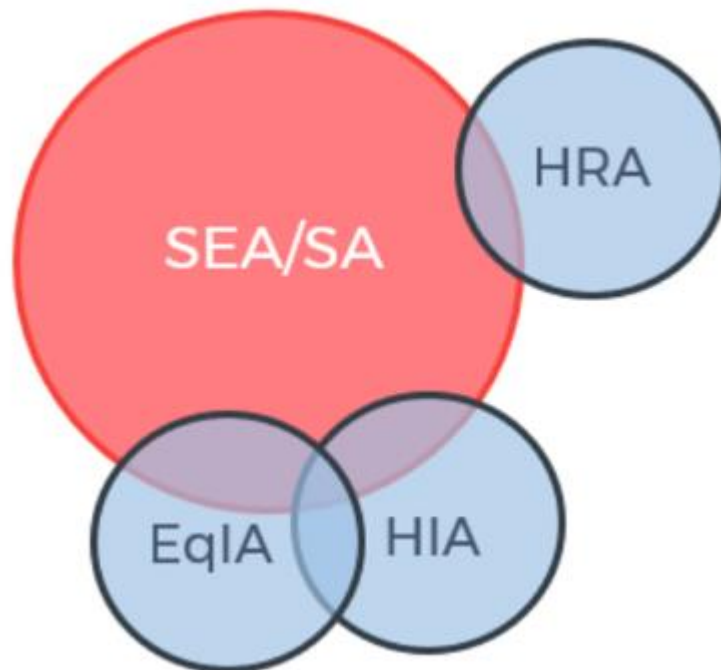
1.3.1. The IIA combines the following assessment processes:

- Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA);
- Equalities Impact Assessment (EqIA);
- Health Impact Assessment (HIA); and
- Habitats Regulations Assessment (HRA).

1.3.2. An integrated assessment approach enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. A single process can improve efficiencies in the assessment itself, as many of the issues covered in the different forms of assessment overlap.

1.3.3. This process also helps to simplify outcomes and recommendations for policymakers. This is demonstrated in **Figure 1-1** below. More detail on each of the components of the IIA have been described below.

Figure 1-1 - IIA and Component Processes



2 Health Impact Assessment

2.1 Introduction

- 2.1.1. HIA is a systematic approach to identifying the differential health and wellbeing impacts, both positive and negative, of projects, plans or strategies.
- 2.1.2. HIA uses both qualitative and quantitative evidence, including public and other stakeholders' perceptions and experiences, as well as public health knowledge. It is particularly concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways, and therefore looks at how health and social inequalities might be reduced or increased by a proposed project or plan.
- 2.1.3. HIA has been defined as:
- “...a combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population”³.*
- 2.1.4. In this context, ‘health’ is defined by the World Health Organisation as:
- “...a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity”⁴.*
- 2.1.5. Health determinants are the personal, social, cultural, economic and environmental factors that influence the health of individuals or populations. These include a range of factors such as income, employment, education and social support.
- 2.1.6. Health inequality can be defined as the difference in either health status, or the distribution of health determinants, between different population groups. Some health inequalities are unavoidable, others are not so, and may well be unjust and unfair.

2.2 Objective of a Health Impact Assessment

- 2.2.1. The aim of a HIA is to support and add value to the decision-making process by providing a systematic analysis of the potential impacts, as well as recommending opportunities, where appropriate, to enhance positive impacts, mitigate negative impacts and reduce health inequalities.

³ World Health Organisation, (n/a). Definition of health assessment (HIA). Available online at: <http://www.euro.who.int/en/health-topics/environment-and-health/health-impact-assessment/definition-of-health-impact-assessment-hia>

⁴ World Health Organisation (n/a). Constitution. Available online at: <https://www.who.int/about/who-we-are/constitution>

2.3 Socio-Environmental Model of Wellbeing

2.3.1. HIA’s apply the below model of health and wellbeing (**Figure 2-1**). The Socio-Environmental Model of Wellbeing considers that health and wellbeing are a result of external influences, where an individual or population experiences a combination of adverse external factors which could result in health inequality.

Figure 2-1 - The Socio Environmental Model of Health and Wellbeing



2.4 Overall aim of this HIA

2.4.1. The overall aim of this HIA will be to identify the aspects of the NLP which have the potential to affect people’s health, both directly and indirectly, in order to develop recommendations to maximise any health benefits, and minimise or remove any adverse impacts.

3 Scope and Methodology

3.1 Introduction

3.1.1. A rapid desktop HIA was undertaken in July 2023. The key tasks for this HIA were as follows:

- Develop a summary health and wellbeing baseline and profile of the LBTH area;
- Identify relevant evidence from literature; and
- Assess the potential health and wellbeing impacts of the NLP, and the nature and likelihood of such impacts.

3.1.2. The approach taken in this HIA is based on guidance produced by the Wales Health Impact Assessment Support Unit⁵, LBTHs own HIA guidance⁶, and professional judgement based on experience of undertaking similar HIAs.

3.2 Scope

Study Area

3.2.1. This is a rapid, desk-based assessment of the direct and indirect health effects on local communities anticipated to result from the implementation of the ten themes and 72 proposed policies of the NLP. The geographic study area of this HIA is therefore the LBTH area.

Study Population

3.2.2. The population scope of this HIA includes the LBTH resident population.

3.2.3. The main vulnerable groups within the population that have been considered are:

- Children and young people;
- Older people;
- People with disabilities and mobility impairment;
- People with existing health conditions;
- Unemployed and low-income groups; and
- Socially excluded or isolated groups.

⁵ Health Impact Assessment: A practical guide. Wales HIA Support Unit, accessed online: https://phwwhocc.co.uk/whiasu/wp-content/uploads/sites/3/2021/05/HIA_Tool_Kit_V2_WEB-1.pdf

⁶ Tower Hamlets Council - Health Impact Assessment Guidance July 2021 v2, accessed online: <https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Building-control/Application-processing/HIA-guidance.pdf>

Determinants of Health

3.2.4. The key determinants of health and wellbeing that have been considered are:

- Air Quality,
- Noise,
- Housing and Homelessness,
- Economy and employment,
- Skills and education,
- Social cohesion and community safety,
- Access to services,
- Physical activity,
- Green Infrastructure, and
- Climate change resilience.

Baseline Health Profile

3.2.5. The baseline and health profile of the LBTH area have been compiled using existing, publicly available data, including:

- Office for Health Improvement & Disparities (OHID) Local Authority Health Profiles;
- Office for National Statistics Labour Market Profiles (Nomis);
- Greater London Authority data;
- Tower Hamlets Annual Public Health report 2022⁷, and
- PHE “Local Health” datasets.

Appraisal

3.2.6. The proposed ten key policy themes were considered and assessed against each of the identified determinants of health, looking first at the baseline conditions of the study area population, evidence of how each determinant impacts human health, the effect that the general principles and policies are likely to have on the health of the study area population, and any vulnerable groups, as presented in **Section 5**. The assessment followed the key detailed in **Table 3-1** below.

⁷ Tower Hamlets Annual Public Health Report 2022, accessed online:
<https://www.towerhamlets.gov.uk/Documents/Public-Health/TowerHamletsPublicHealthReport2022.pdf>

Table 3-1 – Key to Assessment

Effect	Symbol
Positive Health outcomes	+
Negative health outcomes	-
Mixed health outcomes	+/-
Uncertain health outcomes	?
No health effects	0

3.2.7. Mitigation or recommendations are provided for each policy where this is applicable. Where the impact is deemed positive or neutral, any recommendations will outline how to ensure there is no negative impact or opportunities to further advance equality and inclusivity.

3.3 Assumptions and Limitations

3.3.1. Data collected by Healthwatch Tower Hamlets is not entirely representative. Although attempts were made to reach out to all borough communities by attending events, handing out leaflets, and reaching out to organisations it was found that some community groups were hesitant to take part in surveys collecting health data due to a belief that it will not result in any changes in the borough. As such, the data does not necessarily represent the experiences of this community in particular.

4 Community Profile and Baseline

4.1 Introduction

- 4.1.1. Amongst the communities living in, and directly affected by, any changes brought about by the key themes or policies of the NLP, the proportion and profile of vulnerable groups, identified previously in **Section 3.2**, have been outlined below using publicly available data.
- 4.1.2. Community profile data has been used to express the status of vulnerable groups with respect to their vulnerable health status and/or deprivation. In some cases, Health Profile Indicators are implicit rather than explicit, where direct Health Profile Indicators were not available.

4.2 Baseline

- 4.2.1. This section summarises the socio-economic and community baseline conditions for the spatial scope of the HIA. The most recent publicly available information has been used to create these profiles.

Population

- 4.2.2. The total population in LBTH in 2021 was 312,300. Of this total population, 157,100 (50.3%) were male and 155,200 (49.7%) were female⁸.
- 4.2.3. As stated by the LBTH Council Overcrowding and Under Occupation Statement 2013, overcrowding is a prominent issue in Tower Hamlets, impacting on residents' health, education, employment opportunities and well-being. As of 2020, LBTH population density was 16,237 persons per square kilometre, ranking it as the most densely populated local authority areas in the country⁹.
- 4.2.4. The 2021 Census data indicates that the predominant ethnicity of LBTH is Asian/British Asian (44.4%). The proportion of the population which are ethnically white is 41.6% lower than the national average¹⁰. The proportion of LBTH's population which is composed of non-white ethnic groups is higher than the national average, as outlined in **Table 4-1**.

⁸ [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk)

⁹ [borough profile \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk)

¹⁰ [Tower Hamlets facts and figures - E09000030 - ONS](https://www.towerhamlets.gov.uk)

Table 4-1 – Ethnicity of LBTH Population 2021¹⁰

Ethnicity	Tower Hamlets(%)	England (%)
White	39.4	81.0
Mixed/multiple ethnic groups	5.0	3.0
Asian/Asian British	44.4	9.6
Black/African/Caribbean/Black British	7.3	4.2
Other Ethnic group	3.9	2.2

4.2.5. The 2021 Census data outlines the principle religious affiliations reflected in the population of LBTH, and how their proportions compare to national figures. The population of LBTH is predominantly Muslim (39.9%) with the second largest group identifying as of no religion (26.6)¹⁰. These proportions differ significantly from that of a national trend as demonstrated in **Table 4-2** below.

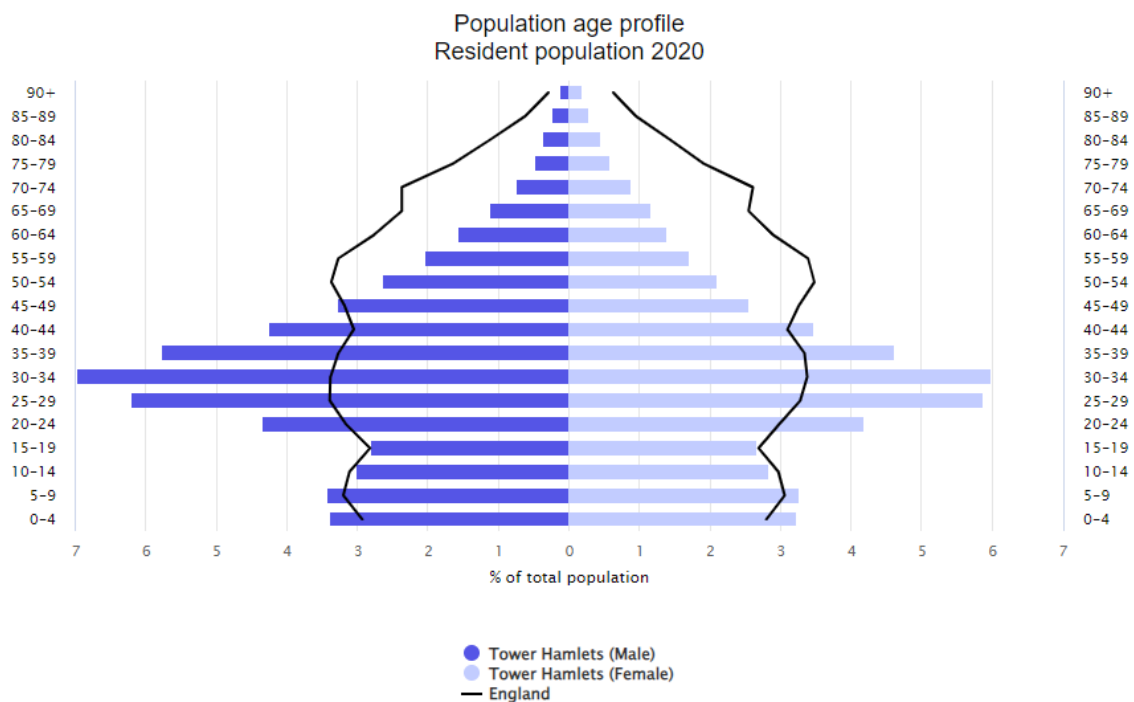
Table 4-2 – Religion of LBTH Population 2021¹⁰

Religion	Tower Hamlets (%)	England (%)
Christian	22.3	46.3
Buddhist	1.0	0.5
Hindu	2.0	1.8
Jewish	0.4	0.5
Muslim	39.9	6.7
Sikh	0.3	0.9
Other Religion	0.5	0.6
No Religion	26.6	36.7
Religion not stated	6.9	6.0

Age

4.2.6. The age profile within LBTH indicates that the population is composed of predominantly Adults, with 75.9% of the population aged between 16-64. This is 5.1% higher than the London average and 11.1% higher than the national average⁸. Within this age group, Tower Hamlets has one of the youngest populations in the country. The largest age group in the borough is 20-39 years at 46%, a figure much higher than that of London (33%) and England (26%)⁹.

Figure 4-1: Population Age Profile of LBTH 2020¹¹



Life Expectancy

4.2.7. Life Expectancy is the measure of the average number of years a person would expect to live in good health based on contemporary mortality rates and prevalence of self-reported good health. The prevalence of good health is derived from responses to a survey question on general health.

¹¹ Population Age Profile [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](https://data.oahid.org.uk/)

- 4.2.8. Life expectancy in LBTH is largely representative of national trends. For males in LBTH, life expectancy (three year range) is 79.9 years, similar to that of the national life expectancy of 79.4 years and slightly below the London average of 80.3 years. The same pattern can be noted for females in LBTH who have a life expectancy of 83.3 years, which is on par with the national average of 83.1 years and slightly lower than the London average of 84.3 years¹². The life expectancy for men in LBTH is approximately 3.4 years less than women in the borough. Gendered differences in life expectancy are representative of regional and national trends.
- 4.2.9. There is significant variation within LBTH's wards life expectancy for both males and females. **Table 4-3** details average life expectancy for specific wards in the borough.

Table 4-3 – Life Expectancy by Ward in LBTH 2021¹³

Ward	Life Expectancy (Males)	Life Expectancy (Females)
Bethnal Green	79.9	84.5
Blackwall & Cubitt Town	82.3	83.1
Bow East	78	81.3
Bow West	79.2	84.4
Bromley North	82.2	86.6
Bromley South	78.8	80.9
Canary Wharf	87.2	85.8
Island Gardens	81.7	84.6
Lansbury	77.1	81.1
Limehouse	N/A - not available	84.7
Mile End	77.4	80.5
Poplar	80.2	83.2

¹² Life Expectancy [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](https://www.phe.org.uk/data/local-authority-health-profiles)

¹³ [Local Health - Office for Health Improvement and Disparities - Indicators: maps, data and charts](#)

Ward	Life Expectancy (Males)	Life Expectancy (Females)
St Dunstan's	78.4	84.6
St Katharine's & Wapping	82.8	84.1
St Peter's	77.9	83.6
Shadwell	79.3	83.7
Spitalfields & Banglatown	81.3	N/A - not available
Stepney Green	75.4	80.1
Weavers	79.4	84.2
Whitechapel	82.3	86.2

4.2.10. The gendered variation in life expectancy within LBTH points to significant differences in health and wellbeing between wards (though some variation may be attributable to the small population that these statistics are derived from). Discounting the wards of Limehouse and Spitalfields and Banglatown due to missing data, the greatest variation in male life expectancy between wards is 11.8 years (with the lowest expectancy in Stepney Green and the highest in Canary Wharf). The greatest female variation in life expectancy between wards is lower than the male variation at 6.8 years (with the lowest expectancy in Stepney Green and the highest in Whitechapel). The largest intra-ward variation between male and female life expectancy is 6.2 years and comes from St. Dunstan's.

Weight and Physical Activity

- 4.2.11. In 2021/22 the proportion of adults (aged 18+) in LBTH who were categorised as overweight or obese was 47.8%. This is lower than the London average of 55.9%, and much lower than the average in England which is 63.8% of the population¹⁴.
- 4.2.12. The proportion of the adult population describing themselves as physically active within LBTH is 67.6%. This is marginally higher than the proportion of the adult population describing themselves as physically active across London as a whole (66.8%), and on par with the rest of England (67.3%)¹⁵.
- 4.2.13. Obesity amongst children is measured through the National Child Measurement Programme (NCMP), which measures the weight and obesity level of both reception children (aged 4-5 years) and year 6 children (aged 10-11 years).
- 4.2.14. The prevalence of overweight children among year 6 children in LBTH was 29.7%, which is significantly higher than both the London average of 25.8% England average of 23.4%. Among reception children, the percentage of children deemed overweight was 19.9%, which was lower than the England average of 22.6%. The proportion of those deemed to be obese amongst in reception children was 10.9%, which was marginally higher than both the London average of 10.8% England average of 10.1%¹⁶.

Lifestyle

- 4.2.15. Smoking is a major risk factor for many diseases, such as lung cancer, chronic obstructive pulmonary disease (COPD) and heart disease, as well as being linked to cancers in other organs, including lip, mouth, throat, bladder, kidney, stomach, liver and cervix.
- Smoking prevalence among adults is slightly lower than the national average with 11.7% of over 18s classed as smokers compared to 12.7% nationally. In 2021/22 4.5% of mothers smoked during pregnancy, a considerably lower rate than both the national average (9.1%)⁹.
- 4.2.16. The number of COPD emergency hospital admissions in LBTH in 2021 varied significantly by ward. **Table 4-4** exhibits shows the number of emergency hospital admission for the condition, with 18 out of the 20 wards having higher hospitalisation rate than the England average of 100 Standardised Admission Ratio (SAR).

¹⁴ <https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data> Adult Prevalence Obesity Profile - Data - OHID (phe.org.uk)

¹⁵ Physical Activity Physical Activity - Data - OHID (phe.org.uk)

¹⁶ Child Prevalence Obesity Profile - Data - OHID (phe.org.uk)

Table 4-4 - Emergency Hospital Admissions for Chronic Obstructive Pulmonary Disease (COPD) in LBTH 2021

Ward	LBTH COPD emergency hospital admissions SAR)
Bethnal Green	179.8
Blackwall & Cubitt Town	154.6
Bow East	201.3
Bow West	155.3
Bromley North	143.7
Bromley South	141.7
Canary Wharf	147.5
Island Gardens	121.8
Lansbury	199.5
Limehouse	171.9
Mile End	204.8
Poplar	177.1
St Dunstan's	149.5
St Katharine's & Wapping	43.3
St Peter's	311.3
Shadwell	154.7
Spitalfields & Banglatown	177
Stepney Green	138.5
Weavers	168.7
Whitechapel	97

Unemployment/Economy

- 4.2.17. According to data collated in 2021, in LBTH a total of 190,300 people are considered to be economically active (aged 16-64 years). Of the remaining economically active population, 8,700 people or 4.6% are unemployed. Unemployment in LBTH is slightly higher than the average in London of 4.4% and England average of 3.6%⁸.
- 4.2.18. Of those considered economically inactive, 41.6% are classified as looking after family/home, a much higher proportion than that of London (24.6%) and England (19.8%).
- 4.2.19. LBTH has a higher-than-average proportion of workers in high value occupations when compared to the rest of England. 62.0% of the population in LBTH are employed in SOC 2010 Major Groups 1-3, including managerial and professional occupations. This is 10.4% higher than the England average of 51.6%⁸.
- 4.2.20. At £870, weekly median earnings for residents in LBTH are the second highest in the UK after the City of London⁹. Comparatively, the average weekly earnings for London is reported to be £765.4, and for all of England is less at £642.2⁸.
- 4.2.21. LBTH experiences great disparity in occupation type and income between residents and workers. Over half of the jobs based in Tower Hamlets are in the financial, professional, and technical sectors but just one third of resident workers are employed in these sectors. Residents are more likely to work in the distribution, hotels and restaurants sector. Additionally, in 2019 residents earned on average £90 less per week than those working in Tower Hamlets – the largest gap between workers and residents in London⁹.

Education

- 4.2.22. The proportion of the population of LBTH who have gained formal qualifications is marginally lower at all NVQ levels, compared to the wider London area. Additionally, the proportion of people in LBTH who have no formal qualifications is higher than the London average. **Table 4-5** shows the percentages of the population in LBTH with qualifications compared to London and England averages.

Table 4-5 – Qualification Level in LBTH 2021⁸

Qualification	LBTH (%)	London (%)	England (%)
NVQ4 and Above	52.1	59.0	43.6
NVQ3 and Above	64.8	71.4	61.5
NVQ2 and Above	76.8	81.5	78.1
NVQ1 and Above	83.0	87.1	87.5
Other Qualifications	10.6	7.4	5.9

Qualification	LBTH (%)	London (%)	England (%)
No Qualifications	6.5	5.5	6.6

Health

4.2.23. The proportion of residents within LBTH living with a long-term illness or health condition is 13.5%. This is 4.1% lower than the national average of 17.6%¹⁷. Prevalence of long-term illness varies greatly between wards as demonstrated below in **Table 4-6**. The lowest proportion of long-term illness comes from Canary Wharf at 8.3%, and the highest prevalence of long-term illness can be found in Stepney Green at 17.8%.

Table 4-6 – Prevalence of Long-term Illness by Ward 2021

Ward	Long-term Illness (%)
Bethnal Green	14
Blackwall & Cubitt Town	8.8
Bow East	14.8
Bow West	13.6
Bromley North	14.6
Bromley South	13.9
Canary Wharf	8.3
Island Gardens	9.7
Lansbury	16.9
Limehouse	9.6
Mile End	14.4
Poplar	13.7

¹⁷ Long-term illness [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

Ward	Long-term Illness (%)
St Dunstan's	16.3
St Katharine's & Wapping	9
St Peter's	14.9
Shadwell	16
Spitalfields & Banglatown	13.9
Stepney Green	17.8
Weavers	15.2
Whitechapel	11.9

4.2.24. Suicide rates within areas can provide an indication of the current state of mental health of residents. The suicide rate within LBTH is 6.6 per 100,000 people. This rate is lower than the London rate of 7.2 per 100,000 and the England average of 10.4 per 100,000¹⁸.

Self-assessed health within LBTH indicates that the resident population consider themselves to be a healthy population. In LBTH in 2011, 85.1% of the population rated their health as 'very good' or 'good', with 10% stating they have 'fair' health. Additionally, 3.6% of the population stated they had 'bad' health, and 1.3% as 'very bad'¹⁰.

Income

4.2.25. In LBTH, the proportion of children (under 16 years) in relative low-income families is significantly higher than the London average, at 26.7% and 16.4% respectively¹⁹. This proportion is also higher than the England average of 19.9%, showing LBTH to have significantly higher than average number of children living in low-income families.

4.2.26. **Table 4-7** below exhibits the average gross hourly and weekly wages of residents in full-time employment within LBTH, compared to both London and England averages. Average wages of LBTH residents in full-time employment are higher both per hour and per week compared to both the London average, as well as the rest of England.

¹⁸ Suicide Rates [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

¹⁹ Children living in low-income families [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

Table 4-7 – Average Gross Weekly and Hourly Earnings of Residents in LBTH 2022⁸

	LBTH (£)	London (£)	England (£)
Gross Weekly Earnings	806.9	765.4	642.2
Gross Hourly Pay	21.26	20.00	16.37

Deprivation

- 4.2.27. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small neighbourhoods in England²⁰. IMD is used by local governments to focus programmes in the most deprived areas and develop strategies, such as the NLPR in RBKC. IMD measures deprivation in small areas / neighbourhoods called Lower Super Output Areas (LSOAs). There 32,844 LSOAs in England.
- 4.2.28. In 2019, of the 144 LSOAs across LBTH, 44 were ranked within the 30% most deprived neighbourhoods and 35 were within the 40-50% of most deprived neighbourhoods. 14 LSOA's were within the 40-50% least deprived neighbourhoods, and 8 were within the 30-20% least deprived neighbourhoods. Only one LSOA's in LBTH was ranked in the 10% least deprived neighbourhoods²¹.
- 4.2.29. The most deprived LSOA's in LBTH are located in the north of the borough and consist of the wards Lansbury, St. Peter's and Stepney green.
- 4.2.30. The least deprived LSOA's in LBTH are located in the south of the borough and consist of the wards Island Gardens, Canary Wharf and St Katherine's and Wapping.

²⁰ [English Indices of Deprivation 2019: research report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

²¹ [Indices of Deprivation 2015 and 2019 \(communities.gov.uk\)](https://communities.gov.uk)

5 Assessment of Policies

5.1 Introduction

- 5.1.1. The policies of the NLP have been reviewed and assessed against the key determinants of health, previously outlined, to identify potential effects within the study area population.
- 5.1.2. Policies have been split into the following themes for ease of assessing, as follows:
- Delivering the Local Plan;
 - Homes for the Community;
 - Clean Green Future;
 - People, Places and Spaces;
 - Inclusive Economy and Good Growth;
 - Town Centres;
 - Community Infrastructure;
 - Biodiversity and Open Space;
 - Movement and Connectivity; and
 - Reuse, Recycling and Waste.

5.2 Delivering the Local Plan

Assessment Summary

- 5.2.1. The assessment identified the following social groups that could be affected by Delivering the Local Plan policies:
- Infants/children and young people including those leaving care;
 - Older people;
 - People with long term health conditions;
 - Women and girls;
 - Unemployed and low-income groups; and
 - Socially isolated groups including new and expectant mothers.
- 5.2.2. The Delivering the Local Plan policies set out a holistic approach to the development of the NLP, and as such, are anticipated to bring about a high degree of positive effect across numerous social groups.
- 5.2.3. Low-income and unemployed groups are positively impacted by the inclusion of developer contributions. By ensuring developers maximise contributions to the delivery of affordable housing, a greater proportion of the borough's population will be positioned to access housing.
- 5.2.4. Social value contributions under this theme are anticipated to have positive impacts. By offering skills and employment workshops as well as further education bursaries, young people will be better equipped to access higher paid jobs into the future, especially those care leavers who may have experienced disruption to their education in earlier years. Social

value contributions also include the adoption of gender inclusive design and the creation of safer spaces, which will be of particular benefit to women and girls.

- 5.2.5. Climate change mitigation is indirectly evident in the NLP's commitment to encouraging active travel and using sustainable delivery methods.

Delivering the Local Plan Assessment

- 5.2.6. The summary of the assessment of the delivering the Local Plan policies on each determinant of health has been detailed below:
- 5.2.7. **Air Quality:** The Council will support developments with reduced negative impacts on air quality. Equally, all construction sites in the borough will be expected to meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice in relation to dust and air quality. Efforts to improve air quality throughout the borough will be beneficial to all social groups, particularly to older people, infants and those with long term health conditions, who are the most likely to be vulnerable to the effects of air pollution.
- 5.2.8. **Noise:** The Council will support developments with reduced negative impacts on noise and vibration. However, increased construction of multiple types of developments across the borough, as set out in the NLP, will likely contribute greatly to overall noise pollution. Increased noise has the potential to adversely affect the tranquillity of the borough.
- 5.2.9. **Housing and Homelessness:** The NLP identifies a range of sites across the borough with which to address the overall demand for housing. Within this, the provision of affordable housing is a key component of the NLP. Policy DV5: Developer contributions ensures developers maximise contributions towards the delivery of affordable housing. This will be mostly beneficial for **low-income** and **unemployed** groups.
- 5.2.10. **Economy and employment:** A key component of the NLP is its promotion of the boroughs thriving economy through continual job creation, job diversification, and employment-led development. The policies under this theme support a range of employment accommodation types in order to diversify the economy and provide small businesses with the space to thrive within the borough. The use of windfall sites will also have the potential to make a significant contribution to the supply of employment land in the borough. Potential social value contributions through Policy DV6 importantly include offering skills and employment workshops for local residents. This is particularly beneficial for **younger residents** seeking employment, especially those **leaving care** who may have experienced disruption to education in their earlier years.
- 5.2.11. **Skills and Education:** Social value contributions through this policy might include helping young people by offering higher education bursaries and skills and employment workshops for a wider group of local residents. This is particularly beneficial for younger residents seeking employment, especially those leaving care who may have experienced disruption to education in earlier years. This may also benefit low income groups who might be seeking to upskill through the provision of bursaries.

- 5.2.12. **Skills and Education:** Social value contributions through this policy might include helping young people by offering higher education bursaries and skills and employment workshops for a wider group of local residents. This is particularly beneficial for **younger residents** seeking employment, especially those **leaving care** who may have experienced disruption to education in earlier years. This may also benefit **low income groups** who might be seeking to upskill through the provision of bursaries.
- 5.2.13. **Social Cohesion and Community Safety:** The council will promote the development of community services themselves as well as community usage of town centres which act as important spaces for socialisation. Under this theme, opportunities to maximise the delivery of social value to positively contribute community benefits is also supported. This includes supporting community organisations which bring about improvements to social wellbeing. Improved social cohesion amongst the community is particularly beneficial to those who are **socially isolated**, including **new and expectant mothers**.
- 5.2.14. Use of the Tower Hamlets Code of Construction Practise is required by Policy DV4: Planning and construction of new development. Through this, the health, safety and wellbeing of the boroughs residents and businesses are protected. Social value contributions under this theme also include the adoption of gender inclusive design and creation of safer spaces, which will be of particular benefit to **women and girls**.
- 5.2.15. **Access to Services:** The policies outlined within this theme positively contribute to Access to services throughout the borough. The design of the built environment to include the provision of accessible services will directly contribute to reducing inequalities (including health inequalities) which is especially beneficial to **older people, people with disabilities, people with long term health conditions** and **low-income** groups.
- 5.2.16. **Physical Activity:** Development proposals under this theme are required to provide healthy environments, including facilitating physical activity and promote physical and mental wellbeing for all residents. Policy DV3 in particular aims to provide high-quality open spaces, culturally sensitive community facilities, and an equitable urban realm that supports walking, wheeling, and other forms of active travel. This will benefit all groups.
- 5.2.17. **Green Infrastructure:** Policy DV3 in particular aims to provide high-quality open spaces and an equitable urban realm that supports walking, wheeling, and other forms of active travel. This is likely to help to increase the provision of green infrastructure which will benefit all residents and generates significant environmental benefits throughout the borough, as well as contributes to other determinants such as climate change resilience.
- 5.2.18. **Climate change resilience:** Social value contributions under this theme include mitigating climate change through all aspects of the development, not just the built form. Climate change mitigation is indirectly evident in the NLP's commitment to encouraging active travel and using sustainable delivery methods.

Table 5-1 – Delivering the Local Plan Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
DV1	0	-	+	+	+	+	+	+	+	+	+ Children and younger people Low income groups - Children and younger people Older people	None identified
DV2	+/-	+/-	+	+	+	+	+	+	+	+	+ / - Older people Children and younger people People with existing health conditions Socially excluded or isolated groups.	None identified
DV3	0	0	+	+	+	+	+	+	+	+	+ People with existing health conditions Socially excluded or isolated groups	None identified
DV4	+	+	0	+	0	+	0	0	0	+	+ People with existing health conditions Socially excluded or isolated groups	None identified
DV5	0	0	+	0	0	+	+	0	0	0	+ Low-income and unemployed	None identified
DV6	0	0	+	+	+	+	+	0	0	+	+ Socially excluded or isolated groups	Social value contributions would be enhanced through specific implementation of plans to encourage communities

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Low-income and unemployed	meaningful engagement in local and regional decision-making.
DV7	0	0	0	+	0	0	0	0	0	+	+ Older people People with disabilities and mobility impairment People with existing health conditions	None identified
DV8	0	0	+	0	0	+	+	0	+	0	+ Older people Children and young people, Socially excluded or isolated groups	None identified

5.3 Homes for the Community

Assessment Summary

- 5.3.1. The assessment identified the following social groups that could be affected by Homes for the Community policies:
- Families with children
 - Older people;
 - People with disabilities and mobility impairment;
 - Homeless people;
 - Students;
 - Gypsies and travellers;
 - Low-income groups; and
 - Socially isolated groups including new and expectant mothers.
- 5.3.2. The Homes for the Community policies aim to ensure the protection and enhancement of existing housing stock, the provision of a range of new housing, and an assurance of high-quality design and execution throughout the borough. This theme is anticipated to bring about a high degree of positive effects across numerous social groups.
- 5.3.3. . The requirement of development proposals to maximise the delivery of affordable homes under this theme will be especially beneficial to the health and wellbeing of low-income groups who are reliant on affordable housing. In particular, family-sized affordable housing as set out by this policy will bring about positive health benefits for families with children throughout the borough. The provision of specialist housing is beneficial to the homeless, older people and people with disabilities or mobility impairments who require supported living for their physical or mental wellbeing.
- 5.3.4. Social cohesion is highly supported by this theme. Regeneration as well as new provision is required to provide residents with a high-quality built environment, including access to community facilities. This is emphasised under specialist housing, with integration of residents into the wider community being a key focus of the policy. Greater opportunities for socialisation under this theme will improve the health and wellbeing of residents. Community safety is also a key consideration and will be considered upon the enhancement and provision of housing throughout the borough.
- 5.3.5. The appropriate locating of student accommodation in close proximity to higher education institutions increases the boroughs walkability for the student population. Shorter commuting distances will encourage the uptake of active travel, which will boost exercise levels and overall physical and mental wellbeing for this population group.

Homes for the Community Assessment

- 5.3.6. The summary of the assessment of the Homes for the Community polices on each determinant of health has been detailed below.
- 5.3.7. **Air quality:** Additional housing in LBTH could result in a higher number of cars on the borough's roads, which could contribute to a worsening of air quality, particularly given a borough-wide Air Quality Management Area (AQMA) is already in place. Temporary worsening of air quality may occur during construction through dust and plant emissions. Negative air quality effects are likely to affect Children and young people, older people and people with disabilities or mobility impairment.
- 5.3.8. **Noise:** Policy HF7: Purpose-built student accommodation could have a negative effect on the amenity of the local neighbourhood including increased noise levels. Similarly, high-density large-scale purpose built shared living developments as proposed by this theme could have impacts on their surrounding communities in terms of noise. The policy mandates that development proposals for student accommodation and high-density large-scale purpose built shared living developments will be required to demonstrate how matters of increased noise levels have been addressed through the management of the facility.
- 5.3.9. Any adverse impacts on noise pollution as a result of policies under this theme would have negative effects on the health and wellbeing of the general population. Conversely, new housing of over 10 residential developments will be located so as to minimise exposure to noise pollution. Reduced exposure to noise pollution would have beneficial health effects for residents.
- 5.3.10. **Housing and Homelessness:** This theme identifies a range of policies targeted towards housing and homelessness in the borough. The theme is specifically geared towards regenerating and protecting existing housing stock, as well as providing a range of new housing including affordable housing, shared living buildings, purpose-built student accommodation and specialist housing to meet the rising housing demands in the borough, and ensuring high standards of living for all.
- 5.3.11. HF3 focuses on current housing, stating that development proposals resulting in the net loss of residential floorspace will not be supported. The protection and enhancement of existing residential spaces in the borough will be beneficial to the general population. Opportunities to improve housing through regeneration schemes including improving access to open space and enhancing connectivity and safety in neighbourhoods will improve the overall health and wellbeing of current and future populations in the borough.
- 5.3.12. The theme also sets out to meet the growing demand for housing through new provision. Within this, a range of accommodation types are supported. HF4 focuses on development proposals for new specialist and supported housing. This will be particularly beneficial for **older people** and **people with disabilities** or **mobility impairment** who often require supported living. The specialist care needs of the homeless are also considered here

through the provision of **homeless** shelters and transitional housing for those experiencing homelessness.

- 5.3.13. HF2 targets affordable housing, stating that development proposals will be required to maximise the delivery of affordable homes. This policy will have positive impacts for low-income groups in the borough whose health and wellbeing are likely dependent on affordable housing. A sub-policy presented here is the requirement for family-sized affordable housing, which will also be beneficial **for families with children**. In particular, family sized housing for **low-income families** is a pressing requirement throughout the borough, and one which is a key consideration of this policy. Similar to this is the provision of Houses of Multiple Occupancy (HMO); HMOs typically are lower cost as residents make use of shared facilities and so are eligible for a shared room rate benefit. This will also bring positive health impacts to **low-income groups**.
- 5.3.14. Appropriate location of new student accommodation is considered here too, with policies ensuring walkability for **students** to their institution which will be beneficial to the student populations overall physical wellbeing. There is potential for disruption to existing residents through noise pollution as a result of new purpose built student accommodation. **Gypsies and Travellers** are also considered under this theme through safeguarding of the existing gypsy and traveller site at Old Willow Close.
- 5.3.15. Finally, the theme outlines requirements for housing standards and quality. By ensuring a certain degree of quality (including minimised exposure to noise and air pollution, exposure to sunlight and adequate amenity space) the policy supports the overall health and wellbeing of the population.
- 5.3.16. **Economy and employment:** The policies outlined within Homes for the Community are unlikely to directly impact upon Economy and employment within LBTH. The delivery of a significant amount of student housing under this theme may compromise the Council's ability to deliver other priorities, including employment space provision. Despite this the delivery of student accommodation will be done so recognising the positive impacts it brings to the communities and the borough's local economy.
- 5.3.17. **Skills and education:** The policies outlined within Homes for the Community are unlikely to directly impact upon Skills and education within LBTH. By supporting the educational attainments of students from the borough and providing affordable student housing accommodation, a greater proportion of residents will be able to gain skills in order to access better jobs into the future, earning a higher income and gaining an improved standard of living which will in turn generate positive effects for health and wellbeing.
- 5.3.18. **Social cohesion and community safety:** Under this theme, a sense of community belonging, and social interaction is promoted through the enhancement of existing housing and provision of new housing. Development proposals for affordable housing are required to provide residents with a high-quality built environment, including the provision of community facilities.

- 5.3.19. A sub-policy of HF4 on specialist housing is the integration of residents into the surrounding community. Specific focus on the opportunities for socialisation by groups in needs of specialist housing like the homeless, older people, people with disabilities and mobility impairments will make significant improvements to their quality of living and general wellbeing. The policy aims to incorporate where practical, small-scale community and town centre uses within the development proposal for specialist housing. Such components can improve the health and well-being of residents as they offer opportunity to play an active role in their community through continued interaction with the surrounding community.
- 5.3.20. Community safety is also a key consideration of this theme. In line with the housing standards and quality set out under this theme all new provision of housing will be built to ensure safety and surveillance.
- 5.3.21. **Access to services:** The policies outlined within this theme positively contribute to access to services throughout the borough. Policies ensure that residents in affordable housing, specialist housing and purpose-built student accommodation will experience the same degree of accessibility to local services as existing housing in the borough. Increased population in the borough through the provision of new housing under this theme may put pressure on existing services. The increased demand on services may have an adverse effect on the health and wellbeing of the population.
- 5.3.22. **Physical activity:** By considering appropriate locations for student accommodation within the borough the policy aims to improve walkability for students. Residing only a short walking distance from a further or higher education institution will likely encourage the uptake of active travel. Higher levels of physical exercise will boost the overall physical and mental wellbeing of this population. Relating to specialised housing, the policy states that where mobility is limited, development proposals should be located within 5 minutes walking distance of amenities including local shops, services and community facilities so that residents can continue to engage in physical exercise within their local community. Walkability here will again bring about improvements to the overall physical and mental wellbeing of residents.
- 5.3.23. **Green Infrastructure:** The policies outlined within Homes for the Community are unlikely to directly impact upon Green Infrastructure within LBTH.
- 5.3.24. **Climate change resilience:** Policy HF9 recognises the need for homes to be able to adapt to climate change without the need for mechanical cooling. This will be particularly beneficial to low-income groups who are likely to be positioned as unable to afford the necessary energy costs for this type of in-home cooling.

Table 5-2 – Homes for the Community Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
HF1	-	-	+	0	0	0	0	0	0	0	+ Low income groups Younger people Older people People with disabilities and mobility impairment People with existing health conditions Socially excluded or isolated groups (Gypsies and travellers) - Children and younger people Older people People with existing health conditions	Increased demand on services throughout the borough as a result of the growing population will require the strengthening of services. This should take the form of provision of new facilities as well as the employment of additional staff.
HF2	0	0	+	0	0	0	0	0	0	0	+ Low income groups	None identified.
HF3	0	0	+	0	0	0	0	0	0	0	No specific groups have been identified.	None identified
HF4	0	0	+	0	0	+	+	0	0	0	+ Older people People with disabilities and mobility impairment	None identified
HF5	0	0	+	0	0	0	0	0	0	0	+ Socially excluded or isolated groups (Gypsies and travellers)	Appropriate sites may need to be identified within or outside the borough as avoid illegal sittings. If new sites outside the borough are required, the council may

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
												need to work with adjoining boroughs to deliver them. LBTH are currently awaiting the outcomes of the Greater London Authorities Gypsy and Traveller Accommodation Needs Assessment
HF6	0	0	+	0	+	+	+	0	0	0	+ Younger people (students) Low-income groups (students) Socially excluded or isolated groups (care leavers)	All purpose-built student accommodation should have a noise nuisance curfew in place between 11pm and 7am. This should be communicated to all new residents upon the start of their tenure as well as potential penalties they could face in instances of breaking the curfew.
HF7	0	0	+	0	0	+	+	0	0	0	+ Low-income groups People with disabilities and mobility impairment	None identified.
HF8	0	0	+	0	0	+	0	0	0	0	+ Low-income groups	None identified
HF9	0	0	+	0	0	+	0	0	0	+	+ Children and younger people People with disabilities and mobility impairment Low-income groups	None identified

5.4 Clean and Green Future

Assessment Summary

- 5.4.1. The assessment identified the following social groups that could be affected by Clean and Green Future policies:
- Infants/children and young people including care leavers;
 - Older people;
 - People with long term health conditions; and
 - Low-income groups.
- 5.4.2. In general, Clean and Green Future results in positive impacts upon health determinants. There are a number of resulting beneficial health effects, particularly upon older people, infants, children and young people including care leavers, people with long term health conditions and low-income groups.
- 5.4.3. Clean and Green Future policies provide positive impacts upon air quality within the borough, benefitting all residents. The improvement of air quality can have particularly beneficial effects for older people, infants, and those with long term health conditions. The reduction in emissions to air including construction related emissions, such as PM₁₀ and PM_{2.5}, as well as the new provision of energy efficient buildings will improve physical health and wellbeing throughout the borough. Similarly, reductions in noise brought about by the proposed policies will contribute positively to the wellbeing of borough residents.
- 5.4.4. This theme of policies also aims to mitigate the risk of flooding and overheating as part of the wider improvements to the boroughs overall climate change resilience. Improved flooding resilience will ensure the preservation of housing and developments in the borough for those living in high-risk flooding areas. These impacts will also positively affect those living in flood zones. Additionally, avoidance of overheating in building design will be beneficial to the health and wellbeing of residents and building users in the borough, as well as positively contribute to the future housing stock of the borough.

Clean Green Future Assessment

- 5.4.5. The summary of the assessment of the Clean Green Future policies on each determinant of health has been detailed below.
- 5.4.6. **Air Quality:** The association between health effects and exposure to air pollutants is now well established, with distinct health risks associated with exposure to particulates available at a local level . Older people, infants, and those with long term health conditions, are the most likely to be vulnerable to the effects of air pollution.
- 5.4.7. Policy CG6 specifically addresses Air Quality within LBTH, outlining measures for the mitigation and improvement of poor air quality in the borough. Specifically, the policy supports the implementation of an air quality positive approach in line with the Air Quality Positive LPG (2023) for all major developments. All other development proposals are required by the policy to meet or exceed the 'air quality neutral' standard. This also includes

the promotion of low or zero emission transport usage and reducing the reliance on private motor vehicles. Where an air quality assessment indicates potential adverse impacts on air quality, development will be resisted unless mitigation measures are put forward.

- 5.4.8. A number of policies within the Clean and Green Future package also contribute to maintaining, and improving, air quality throughout LBTH. CG2, CG3, and CG4 focus on the provision of energy efficient buildings. Residents' health will be improved as a result of these policies due to a reduced exposure to air pollutants. The anticipated beneficial effects of these policies are most likely to be felt in areas of low-income, in population groups with long term health conditions, older populations, and younger populations, particularly in wards in the north of the borough. Improvements to the public realm through reductions in air pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.
- 5.4.9. The development and introduction of these policies is likely to improve the air quality within the borough and minimise the negative effects upon those in the most vulnerable social groups.
- 5.4.10. **Noise:** The NLP will aid in reducing noise and vibration. Policy CG10: Noise and Vibration, outlines the criteria for new developments and noise as well as efforts to manage existing noise sources. This policy will result in the reduction of noise and vibration attributed to new and existing developments throughout the borough, reducing the levels of nuisance felt to those living in close proximity to developments and existing noise sources, as well as positively contributing to the tranquillity of the borough.
- 5.4.11. **Housing and Homelessness:** The Policies outlined within Clean and Green Future are unlikely to directly impact upon homelessness within the borough. Potential beneficial impacts to housing will result from the improvement of the boroughs housing stock through policies CG2, CG3 and CG4. Their focus on the provision of energy efficient buildings and associated energy savings for current and future residents will work to reduce costs and support better quality housing stock for the borough's population.
- 5.4.12. **Economy and employment:** Policies proposed within the NLP's Clean and Green Future will contribute to a circular economy within the borough, with new developments aligned with circular economy principles. In particular, CG4: Embodied carbon, retrofit and circular economy requires major development proposals to assess whole lifecycle carbon emissions using the methodology set out in the London Plan (2021) and Whole Lifecycle Carbon Assessment LPG (2022). This will help to protect the borough for the future through limiting waste, air pollution, and emissions.
- 5.4.13. With a higher rate of unemployment than the region and England, design requirements as part of the Clean and Green Future policies could indirectly result in job opportunities in the borough, particularly within the construction and renewable energy sectors. Jobs in construction are especially accessible to young people with low skill and education levels, including care leavers who may have experienced disruption to their education in earlier years.

- 5.4.14. Skills and education The policies outlined within Clean and Green Future are unlikely to directly impact upon skills and education within LBTH.
- 5.4.15. **Social cohesion and community safety:** The policies outlined within Clean and Green Future are unlikely to directly impact upon social cohesion and community safety within LBTH.
- 5.4.16. **Access to services:** The policies outlined within Clean and Green Future are unlikely to directly impact upon access to services within LBTH.
- 5.4.17. **Physical activity:** The rate of obesity within adults in LBTH is lower than both London and England averages. The proposed policies are not anticipated to have a direct impact on physical activity in the borough. There are potential positive cumulative improvements to biodiversity, in conjunction with biodiversity and open space policies. Improved biodiversity and open space will likely encourage borough physical activity outdoors to an improvement public realm and green spaces.
- 5.4.18. Green Infrastructure Clean and Green Future will likely involve the use of green infrastructure methods which will preserve and improve infrastructure for the borough, bringing about positive impacts. Specifically, the first item in the London Plan cooling hierarchy that is to be implemented throughout the borough is the provision of green infrastructure. Doing so generates significant environmental benefits, as well as contributes to other determinants such as climate change resilience.
- 5.4.19. **Climate change resilience:** There are numerous impacts of climate change, both acute and chronic, that may be felt within LBTH. Most notably, the London-wide vulnerability mapping (2020) indicates that Tower Hamlets is at an increased risk of overheating as a direct result of climate change. Overheating can cause significant discomfort to residents and building users and is particularly detrimental to Older people.
- 5.4.20. Policy CG5 is targeted towards overheating, ensuring that development proposals are designed with a view to avoid overheating and excessive heat generation, whilst also minimising the need for internal mechanical cooling systems. However, this only accounts for new developments, leaving those in existing properties vulnerable to climate change events.
- 5.4.21. Multiple Clean and Green Future proposed policies also address plans to limit and reduce the carbon emissions of the borough, aiming to limit further damage to the climate as a result of developments within the area. This will not only improve climate resilience but also contribute towards improved air quality which is beneficial for the overall health of residents throughout the borough.

Table 5-3 – Clean and Green Future Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
CG1	+	0	0	+	0	0	0	0	+	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
CG2	+	0	+	0	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
CG3	+	0	+	0	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified.
CG4	+	0	+	+	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions +/- Low income groups	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers. Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
CG5	+	+	+	0	0	0	0	0	0	+	+Older people	None identified

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Children and young people People with existing health conditions Low income groups	
CG6	0	0	0	0	0	0	0	0	0	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
CG7	0	0	0	0	0	0	0	0	+	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
CG8	0	0	0	0	0	0	0	0	0	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
CG9	+	+	0	0	0	0	0	+	+	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
CG10	0	+	0	0	0	0	0	0	0	0	+ Older people Children and young people People with existing health conditions Low income groups	None identified
G11	0	0	0	0	0	0	0	0	0	0	No specific groups have been identified.	None identified

5.5 People, Places and Spaces

Assessment Summary

- 5.5.1. The assessment identified the following social groups that could be affected by the People, Places and Space theme policies:
- Infants/children and young people;
 - Older people;
 - People with long term health conditions;
 - Women and girls;
 - Unemployed and low-income groups; and
 - Mothers and caregivers.
- 5.5.2. The policies proposed within the People, Places and Spaces theme have the potential to result in positive health effects upon multiple social groups, primarily through improving the quality of housing provision within LBTH. Improved quality of housing as well as associated access to open space will contribute positively to the physical health and wellbeing of the LBTH population. Additionally, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions.
- 5.5.3. The theme also aims to improve the provision of appropriate facilities for residents and the wider community. Improved access to services will improve the health and wellbeing of older residents and contribute towards reducing loneliness.
- 5.5.4. This theme has a strong focus on generating adequate housing provision for the borough, with specific reference to housing affordability, including in the form of tall buildings. This policy could result in positive impacts upon housing and homelessness in LBTH, improving the availability of community housing for those on low-incomes, or who are homeless.
- 5.5.5. The affordability of community housing within LBTH may not be truly affordable for those who are currently homeless or on very low-incomes, and therefore some beneficial effects may be limited in their distribution.

People, Places and Spaces Assessment

- 5.5.6. The assessment of the People, Places and Spaces policies against each of the key determinants of health have been outline below.
- 5.5.7. **Air Quality:** The association between health effects and exposure to air pollutants is now well established, with distinct health risks associated with exposure to particulates at a local level²². Older people, infants, and those with long term health conditions are the most likely to be vulnerable to the effects of air pollution.
- 5.5.8. Urban greening as encouraged by policy PS2: Tall Buildings, will help to support air purification and dust suppression which could help to reduce the levels of air pollution within the borough. Additionally, the retrofitting of heritage assets as outlined in PS6: Heritage and

the Historic Environment, to achieve greater energy efficiency will do so in line with the Council's policies on improved air quality. Improvements to the public realm through reductions in air pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.

- 5.5.9. The significant scale of construction activities occurring simultaneously as a result of the development proposed under this theme will likely generate short-term noise and air pollution. Dust and emissions created from construction will be damaging to the health of vulnerable residents including older people, infants and those with long term health conditions.
- 5.5.10. **Noise:** The policies support of new and higher standard housing will result in increased levels of residential occupation and the associated increase in ambient noise levels. Additionally, construction related noise from new housing developments may negatively impact upon the tranquillity and consequent physical and mental health of residents in the borough. Policy PS3: Securing Design Quality, aims to offset these likely impacts by ensuring developments do not result in unacceptably harmful impacts arising from noise pollution and their subsequent harmful effects on human health.
- 5.5.11. **Housing and Homelessness:** This theme of policies has a strong focus on the provision of housing within the borough. Policy PS2: Tall Buildings, aims to positively contribute to meeting the borough's high housing targets in a way that meets the needs of those requiring affordable housing.
- 5.5.12. Policy PS3 (Securing Design Quality), mandates that the highest standard of design is met by all new developments, ensuring the quality of new housing as well as the quantity assured by PS3. However, improvements made to housing quality will apply to new residential developments only. This means that existing homes, particularly community housing, will not necessarily see improvements of the same scale, limiting the distribution of beneficial effects. This will adversely impact low-income groups who live in community housing and cannot afford to make improvements to their home independently.
- 5.5.13. The policy does not specifically target homelessness, although there is a likely positive effect on homelessness as a result on increased provision of affordable housing.
- 5.5.14. **Economy and employment:** Policy PS9: Shopfronts, outlines the need for active shopfronts which will help to improve the economic diversity within the borough, supporting the strength of the local economy. The policies outlined within this theme are unlikely to directly impact upon employment within LBTH.
- 5.5.15. **Skills and education:** The policies outlined within this theme are unlikely to directly impact upon Skills and Education levels within LBTH.
- 5.5.16. **Social cohesion and community safety:** According to the IMD for crime , of LBTH's 144 LSOA's, 44 are within the 30% most deprived. These LSOA's are located predominantly in the north of the borough. Improvements to the public realm including housing within LBTH, as proposed under this theme, are likely to improve social cohesion and community safety

in the borough for all residents. The provision and enhancement of community facilities such as community hubs will provide spaces for members of the community to come together and socialise, including cross-cultural engagement. The policy also states that facilities such as open space should be designed in collaboration with the local community in order to meet their needs for sociability. Gender inclusive design in line with this theme will also aid in encouraging women and girls to engage with socialisation spaces as a result of their improved feelings of safety within them.

- 5.5.17. **PS4: Attractive Streets, Spaces and Public Realm**, encourages new developments to embed principles of 'Secured by Design'. The policy mandates developers should refer to crime prevention and security guidance to ensure all risk is mitigated. Policy PS5: **Gender Inclusive Design**, will work to ensure mothers and caregivers have access to facilities to be able to meet and socialise outdoors in a safe and social setting.
- 5.5.18. Gender is also considered in relation to the safety of women at night, ensuring routes are well-signed and appropriately lit to foster feelings of safety in the space. The improvement of women's safety will work to relieve feelings of stress and unease for women when moving through spaces, positively contributing to the mental wellbeing of female residents in the borough.
- 5.5.19. **Access to services:** PS4: Attractive Streets, Spaces and Public Realm aims to improve the provision and accessibility of appropriate facilities for residents and the wider community. Improved access to services such as healthcare services will improve the overall physical and mental health of older people, as well as contributing to reductions in loneliness experienced by older residents in the borough. Improvements to services and access to them is particularly important to the Bangladeshi community within the borough, whose responses within the Healthwatch Tower Hamlets Survey showed that this group sought a prioritisation of improved services and activities for young people, access to a place of worship, access to healthy eating programmes and public transport facilities like bus stations .
- 5.5.20. **Physical activity:** The development of new housing, especially tall buildings, within the NLP is required to provide high quality private communal open space. Access to open space will encourage and enable improvements in physical activity levels within the borough, leading to a potential reduction in incidents of obesity and the proportion of residents who are overweight. These positive effects could potentially impact across all demographic groups.
- 5.5.21. **Green Infrastructure:** Numerous proposed policies in this theme will positively contribute to green infrastructure in the borough, predominantly through the provision of open space and urban greening in association with new housing. Improvements to the public realm through additional green spaces can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.

- 5.5.22. **Climate change resilience:** During the construction of new housing developments, emissions from vehicles and construction plant may be higher and therefore adversely affect the climate.
- 5.5.23. The resilience of new housing developments to climate change factors such as heat and flooding will have beneficial contributions to the boroughs climate resilience. This is due to the policies of building requirements to reduce overheating in the borough as well as the requirement to put forward flood risk mitigation upon development. Improvements made to housing through prevention of overheating and implementation of cooling systems will be particularly beneficial to older people and people with long term health conditions.
- 5.5.24. Additionally, the retrofitting of heritage assets as outlined in PS6, Heritage and the Historic Environment, to achieve greater energy efficiency will do so in line with the council's policies on climate change, positively contributing to climate change resilience in the borough.

Table 5-4 – People, Places and Spaces Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
PS1	+/-	+/-	+	0	0	+/-	0	0	+	0	- Socially excluded or isolated groups + Children and young people Older people Socially excluded or isolated groups	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
PS2	+/-	-	+	0	0	+/-		0	0	0	- Socially excluded or isolated groups People with disabilities and mobility impairment	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users. Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
PS3	+/-	+/-	+	0	0	0	+	+	+	+	+ Children and young people Older people People with existing health conditions - Low-income groups	Securing design quality should not come at the expense of affordable housing, in order that first time buyers and those on lower incomes remain able to buy into the property market and not be priced out, or not have access to quality development.
PS4	+	0	0	0	0	+	+	+	+	+	No specific groups identified	Street features and public realm that are frequented by vulnerable groups such as children and low-income groups should consider avoiding locating nearby

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
												advertisement content including hot food takeaway and betting.
PS5	0	0	0	0	0	+	+	+	0	0	+ Socially excluded or isolated groups (Women and girls, LGBTQ+ community and ethnic minority groups) Older people Children and young people	The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.
PS6	0	0	+	0	0	+	0	0	0	0	+ Older people People with disabilities and mobility impairment	None identified
PS7	0	0	0	0	0	+	0	0	+	0	+ Older people People with disabilities and mobility impairment	None identified
PS8	0	0	0	0	0	+	0	0	0	0	No specific groups identified.	None identified
PS9	0	0	0	+	0	+	0	0	0	0	+ Older people People with disabilities and mobility impairment	Shopfronts can act as key sites of sensory overload for the neurodivergent population of the borough. Enhancement of appearance to shopfronts should consider potential adverse effects on neurodivergent people.
PS10	0	0	0	+	0	+	0	0	0	0	+/- Older people	Advertisement content including hot food takeaway and betting should consider placement away from areas where

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											People with disabilities and mobility impairment Children and young people (School age)	vulnerable groups such as children and low-income groups may frequent. Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered.
PS11	0	0	0	0	0	0	0	0	0	0	No specific groups identified.	None identified

5.6 Inclusive Economy and Good Growth

Assessment Summary

- 5.6.1. The assessment identified the following social groups that could be affected by the Employment and Economic Growth theme policies:
- Young people including care leavers;
 - Elderly;
 - Mothers and caregivers; and
 - Unemployed and low-income groups.
- 5.6.2. This theme of policies focuses on the support and enhancement of economic growth across the borough. This is predominantly put forward through the protection of existing employment spaces, and creation of new spaces, including affordable ones.
- 5.6.3. The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough's employment spaces. The designation of Strategic Industrial Locations will protect existing spaces of economic activity and allow the borough to maintain its position as a global economic hub. Equally, any development that will result in the direct loss of employment floorspace within these strategic industrial locations will not be supported under this theme. New employment spaces are also covered by this theme, with affordability of commercial space being a key requirement to this. Affordability is anticipated to allow the emergence of a wider range of economic sectors in the borough.
- 5.6.4. The policy also supports the provision of education and upskilling opportunities throughout the borough. In doing so the current skills gap amongst the working population will likely diminish and a wider range of jobs will be accessible to a greater proportion of the population.
- 5.6.5. New developments are not yet required to respond to the future climate needs of the borough. Flooding and overheating are not considerations of new employment space development and so the risk of such events is not mitigated through this theme.

Inclusive Economy and Good Growth Assessment

- 5.6.6. The assessment of the Inclusive Economy and Good Growth policies against each of the key determinants of health have been outline below.
- 5.6.7. **Air Quality:** The policies included within the Economy and Town Centres theme are unlikely to have a direct impact on air quality within LBTH. The intensification of industrial uses in the borough could lead to more HGV trips on local roads, leading to increased air pollution. This would bring adverse effects to the overall health and wellbeing of all borough residents.
- 5.6.8. **Noise:** Policy EG2: New Employment Spaces, seeks to ensure that new employment development does not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.

- 5.6.9. **Housing and Homelessness:** Policy EG1: Creating Investment and Jobs aims to support mixed-use development which could include residential development. This will help to increase the provision of housing in the borough however, this policy does not mention the affordability of these homes or the quantity to be made available. Through the safeguarding of land for employment uses, residential development will be hindered in areas of the borough due to this policy.
- 5.6.10. **Economy and employment:** Policy EG1: Creating Investment and Jobs, supports development proposals which provide employment opportunities. The policy also mandates that a range of job opportunities at all levels will be accessible across the borough. A range of job opportunities is particularly beneficial to young people with low skill and education levels, including care leavers who may have experienced disruption to education in their earlier years.
- 5.6.11. Employment spaces are also considered under this theme, with existing designated employment locations being protected and the provision of additional employment floorspace encouraged, including the provision of affordable commercial space. Developments that will result in the direct loss of employment floorspace within strategic industrial locations will not be supported by the council under this theme.
- 5.6.12. All policies under this theme are aimed towards supporting and promoting successful and sustainable economies in Tower Hamlets, as well as protecting the borough's global, national and local economic role in delivering jobs and supporting businesses. The protection of existing strategic industrial locations will support the long term position of the borough as a global economic hub. Additionally, by supporting and promoting a range of new employment spaces including affordable ones, the policy also supports new and emerging economic sectors.
- 5.6.13. **Skills and education:** Policy EG1: Creating Investment and Jobs aims to support the generation of employment opportunities by closing the current skills gap amongst the working population through improving access to education and training. Additionally, the requirement for affordable commercial space under this theme is intended to support educational outcomes through connections to schools, colleges and higher education. This policy's intended provision of upskilling and education opportunities is particularly beneficial to young people with low skill and education levels, including care leavers who may have experienced disruption to education in earlier years.
- 5.6.14. **Social cohesion and community safety:** The railway arches in Tower Hamlets are a key component of the culture and community of the borough. Policy EG5: Railway Arches, seeks to retain those railway arches in uses that make a positive contribution to the community. Specifically, the policy supports development proposals involving railway arches where the principle use is for the community. Policy EG6: Data centres aims to ensure sufficient broadband capacity to serve all residents. Where broadband has previously been insufficient, this policy will bring about alternative forms of social cohesion as digital connectivity will be enhanced throughout the borough. This could be especially beneficial to

the mental wellbeing of elderly people who might suffer from social isolation and loneliness though such a benefit is reliant on a degree of digital literacy amongst this population group.

- 5.6.15. **Access to services:** Those who commute to work via cycling are supported by policy EG3: Affordable workspace through its provision of end-of-trip facilities in workplaces. This may be particularly beneficial to low-income groups who may find cycling to work to be an economically efficient and therefore preferable method of transport.
- 5.6.16. New employment spaces should provide a range of shared services and appropriate facilities such as communal breakout spaces, kitchen areas, showers and childcare facilities. This policy will be beneficial to a range of groups. Low-income groups who might cycle to work for economic efficiency will benefit from shower facilities, as well as kitchen spaces that will allow them to bring food prepared at home rather than purchase food at work to keep costs down. Equally, mothers and caregivers will benefit from the provision of childcare facilities.
- 5.6.17. **Physical activity:** The policies outlined within this theme are unlikely to directly impact upon physical activity levels within LBTH. Provision of shower facilities in new workspaces under this theme may encourage active transport to work, including cycling, or participation in exercise during breaks (e.g. going for a run at lunchtime) which would improve the overall physical health of those workers engaging in these activities.
- 5.6.18. **Green Infrastructure:** The policies outlined within this theme are unlikely to directly impact upon green infrastructure within LBTH.
- 5.6.19. **Climate change resilience:** The construction and operation of new employment spaces will adversely impact climate in the borough, contributing to overall GHG emissions. Additionally, there is no reference to climate change factors like flooding and overheating in relation to the development of new employment spaces under this theme, and so resilience of such spaces to climate change will be minimal. This could have an adverse impact on residents and workers in the borough.

Table 5-5 – Inclusive Economy and Good Growth Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
EG1	0	-	+	+	+	0	+	0	0	-	+ Low-income groups Younger people - Older people Children and young people People with disabilities and mobility impairment	None identified.
EG2	+/-	+/-	0	+	0	0	+	0	0	-	+ Low-income groups People with disabilities and mobility impairment - Older people Children and young people People with disabilities and mobility impairment	New employment spaces should be a diverse mix of office space and spaces for small businesses to thrive. Economic prosperity and good health outcomes are inextricably linked. Providing a range of business types can provide employment opportunities to a wider range of population groups whose health would benefit from being employed.
EG3	0	0	0	+	+	0	+	0	0	0	+ Low income groups	None identified
EG4	0	0	0	+	0	0	+	0	0	0	+ Low income groups	None identified
EG5	0	0	0	+	0	+	+	+	0	0	No specific groups have been identified.	None identified.
EG6	0	0	0	+	0	0	0	0	0	0	No specific groups have been identified.	None identified

5.7 Town Centres

Assessment Summary

- 5.7.1. The assessment identified the following social groups that could be affected by Town Centres policies:
- Young people including care leavers;
 - Older people;
 - People with disabilities;
 - Women and girls;
 - New and expectant mothers
 - Unemployed and low-income groups; and
 - Socially excluded or isolated groups.
- 5.7.2. The policies outlined within the Town Centres theme are likely to have mixed impacts upon the selected health determinants. These impacts are likely to be predominantly positive, with positive effects expected for young people including care leavers, older people, new and expectant mothers, women and girls, people with disabilities, low-income and unemployed groups and socially isolated groups.
- 5.7.3. The Town Centres theme supports social cohesion across the borough, with existing routes being prioritised and new venues being developed to encourage opportunities for social interaction between community members. Community safety could be compromised by the planned increase of night-time leisure and entertainment venues due to their potential to cause anti-social behaviour. This is particularly likely to impact young people who could be the main users of these venues. Mitigation measures are to be put in place via a management plan to avoid negative impacts of this on the surrounding community.
- 5.7.4. Access to services is highlighted by this theme, and the provision of community services is demonstrated to be the primary function of district centres and neighbourhood centres in the borough. Services are also being made more widely available to those workers in the night-time economy, who cannot access them during normal business hours, through the requirements for late-opening and 24-hour services.
- 5.7.5. Development in town centres are anticipated to have significant positive economic effects. The policies under this theme encourage and support existing and new business ventures in the borough, resulting in additional employment opportunities throughout. In particular, the planned increase of night-time leisure and entertainment venues in the borough will provide employment opportunities, as well as boost the local economy. The increase in employment opportunities as a result of this policy could have a positive impact on currently unemployed and low-income residents in the borough.

Town Centres Assessment

The assessment for Town Centre policies against each of the determinants of health has been set out below.

- 5.7.6. **Air Quality:** Policy TC2: Protecting the diversity, vitality, and viability of our town centres, seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
- 5.7.7. **Noise:** Numerous policies under this theme contribute positively to the noise environment throughout the borough. Policy TC2: Protecting the diversity, vitality and viability of our town centres, seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.
- 5.7.8. Food and drink venues under this policy will be required to demonstrate that the use of outdoor spaces will not have a significant impact on neighbourhood residential occupiers in terms of noise. Proposals for evening and nighttime leisure uses will also be expected to submit a management plan including methods to mitigate amenity impacts such as noise.
- 5.7.9. Improvements to the public realm through reductions in noise pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.
- 5.7.10. **Housing and Homelessness:** The provision of short-stay accommodation under this theme will not compromise the supply of C3 self-contained homes and would not undermine the borough's ability to deliver against strategic housing targets. This will enable the continuation of affordable housing rollout, which will be beneficial for low-income groups who are the key recipients of such housing schemes and targets. Policy TC1 also promotes 'multi-purpose' town centres which include residential uses, which will support the provision of varied housing options available to local residents.
- 5.7.11. **Economy and employment:** Developments to town centres are anticipated to have positive economic effects. This theme's support of town centres directly continues the support of their role as key global employment centres. The protection and enhancement of existing employment spaces will positively contribute to the localised economies present in the borough.
- 5.7.12. Developments to town centres will encourage business investment in LBTH and improve the economy of the borough. Both larger businesses and independent, artisanal sector businesses will be encouraged to set up in developed, diverse town centres in LBTH. A diverse range of employment opportunities, including lower skilled work will be beneficial for those groups who are currently unemployed or those whose low skill and/or education levels, like young people (including care leavers), currently prohibit their entry into the borough's more predominant higher paid job markets. These employment opportunities may be high-quality, facilitating training for the low skilled to gain access to higher paid roles.

- 5.7.13. Additional town centre developments could contribute to the availability of additional employment opportunities within the borough, especially to otherwise marginalised groups. This theme can have a positive impact on those groups as a result of the nature of businesses in town centres, their physical proximity to residents, and the sense of community that they provide.
- 5.7.14. The improvement of town centres, and increase in employment opportunities could, potentially, have a positive impact on currently unemployed and low-income residents in the borough. Policy TC7: Evening and Night-time Economy specifically aims to boost the local economy by supporting food, drink and leisure uses in the evening and at night.
- 5.7.15. **Skills and education:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Skills and Education levels within LBTH, however, employment opportunities have the potential to boost skills and education through training, when provided by the employer.
- 5.7.16. **Social cohesion and community safety:** The diversification and investment in improving Town Centres in LBTH could improve social cohesion in the borough. Under this theme key pedestrian routes and street level activity will be prioritised in order to encourage opportunities for social interaction in the borough's town centres. The particular focus on food and drink provision in TC5 is especially significant for social cohesion as cafes and pubs provide ideal spaces for local residents, workers and students to meet and socialise. Enhancing these spaces will improve the levels of social cohesion possible in the borough.
- 5.7.17. There is potential for the increasing numbers of evening and night-time leisure and entertainment venues to give way to anti-social behaviour in the borough. Such instances would have negative impact on social cohesion and safety community wide. The policy aims to mitigate this through the adoption of a management plan. Gender inclusive safety (predominantly in night-time venues that involve the consumption of alcohol) is improved under this theme through the implementation of National Pubwatch and the 'Ask for Angela' scheme. Women and girls will benefit from this addition especially. Improved feelings of safety will enable women to engage more fully in social activities at night, alleviating feelings of stress and unease and promoting good mental health.
- 5.7.18. **Access to services:** Under this theme the network of centres across the borough is defined in relation to their function and how they serve the wider area. District centres and neighbourhood centre's primary role is the provision of community services to meet local needs. Easily accessible services are of a great beneficial impact to many social groups in the borough. In particular, health care services are of great importance to older people, new and expectant mothers, and those with disabilities.
- 5.7.19. Tower Hamlets has a high proportion of workers in the evening and night-time economy. As such, in order to better serve those who are unable to access services during normal business hours the policy encourages late-opening and 24-hour shops and services in the boroughs town centres. This will benefit those socially isolated groups who are limited in their ability to engage in daytime activities as a result of their employment situation.

- 5.7.20. **Physical activity:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Physical activity levels within LBTH due to the lack of inclusion of active travel measures, however, the physical proximity of town centre services to residents may encourage active travel to be favoured as a result of improved accessibility
- 5.7.21. **Green Infrastructure:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Green Infrastructure within LBTH due to the lack of policy relating to the inclusion of green infrastructure.
- 5.7.22. **Climate change resilience:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Climate change resilience within LBTH due to the lack of policy relating to the mitigation of climate risk factors like flooding and overheating.

Table 5-6 – Town Centres Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
TC1	0	+/-	+	+	0	+/-	+	0	0	0	+ Younger people Low income groups and unemployed +/- Older people Socially excluded groups	Developments should seek to improve the public realm.
TC2	+	+	+	+	0	+	+	0	0	0	No specific groups have been identified.	No mitigation measures have been identified.
TC3	0	0	0	+	0	+	+	0	0	+	No specific groups have been identified.	Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres and is necessary to meet the immediate convenience needs of local people and/or support the function of designated employment locations.
TC4	0	0	0	+	0	+	0	0	0	0	+ Low-income groups and unemployed	No mitigation measures have been identified.
TC5	0	+	0	+	+	+	0	0	0	0	+ Low-income groups and unemployed Young people People with existing health conditions	It is recommended that waiting delivery drivers are prevented from acting as obstacles to users, including disabled users. If required this will be covered in a transport management plan.
TC6	0	0	0	+	0	0	+	0	0	0	+ Low-income groups and unemployed Young people	Developments should seek to improve the public realm. Hot food takeaway and gambling premises should continue to be placed away from areas where vulnerable groups such as children and low-income groups may frequent.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
TC7	0	-	0	+	+	0	+	0	0	0	+ Low-income groups and unemployed Young people Socially excluded or isolated groups - Children And young people Older people	The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis. Operation of the evening economy should be considered in tandem with safety measures to protect groups who could be more likely to be a victim of hate crimes. More emphasis should be placed on ensuring that nighttime uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.
TC8	0	0	+	+	0	0	0	0	0	0	No specific groups have been identified.	Ensure accessibility standards are adhered to in short-stay accommodation

5.8 Community Infrastructure

Assessment Summary

- 5.8.1. The assessment identified the following social groups that could be affected by Community Infrastructure policies:
- Infants and children;
 - Young people;
 - Older people;
 - People with long term health conditions;
 - People with disabilities; and
 - Socially excluded or isolated groups.
- 5.8.2. Community infrastructure policies aim to ensure the protection and enhancement of social and community facilities throughout the borough, including supporting new developments. These policies will have predominantly positive effects upon the community of LBTH. These policies are anticipated to benefit children and young people, older people, people with disabilities, people with long term health conditions, and socially excluded groups.
- 5.8.3. The provision of social infrastructure and facilities under the theme includes the provision of education facilities within the borough. This could potentially have positive effects for children and young people through increasing education levels and improving skills. Increasing levels of education among children in LBTH is likely to contribute to higher employability and an improved quality of life for children.
- 5.8.4. The improvement of social infrastructure such as parks and sports centres will also increase social cohesion and safety within the borough. This will benefit many social groups through providing areas for the community to interact. New community facilities should also enhance feelings of safety throughout the community.

Community Infrastructure Assessment

- 5.8.5. The assessment of the Community Infrastructure policies on each of the determinants of health have been detailed below.

Air Quality: Policy CI3: New and enhanced community facilities, seeks to ensure that development proposals for new community facilities take into consideration air quality levels as set out in the relevant guidance from the Department for Education and Sport England. The location of early education and childcare facilities in particular must meet the needs of young children and promote their development, doing this by being located away from areas of poor air quality. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents, especially infants and children in the borough.

Noise: Policy CI4: 'Development proposals demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity... (e.g. providing sufficient sound insulation) in line with the agent of change principle'. Compliance with

Policy CI4 should ensure that any potential adverse effects created by noise should be mitigated by specific measures (e.g. sound insulation).

Housing and Homelessness: The policies outlined within this theme are unlikely to directly impact upon housing and homelessness within LBTH. By ensuring community facilities are located in accessible locations to housing, the quality of housing is indirectly improved through this theme.

Economy and employment: The improvement of social infrastructure establishments, such as health facilities, childcare facilities, and other services, are likely to provide additional high quality employment opportunities within LBTH. The provision of services related to childcare is particularly beneficial to women and caregivers as it may enable them to re/enter the employment market.

However, the ability for local residents to take up new employment opportunities will be dependent on the available skills in the resident population of LBTH. Where these skills are not available within current residents, roles may be filled with out of borough residents diluting the benefits to the local resident population.

Skills and education: The NLP will support the development of education facilities. This will ensure that children and young people in the borough have high quality facilities which enable them to attain good qualifications and educations. The policy includes a specific reference to the requirement for educational support needed for care leavers who may have experienced disruption to education in earlier years, and as such are especially in need of upskilling and educational opportunities.

Social cohesion and community safety: This theme has the potential to benefit social cohesion amongst the borough's population. The policies proposed within this theme include the preservation and enhancement of recreation facilities and other facilities used as social hubs. The development of such facilities may improve social cohesion and encourage those who are socially isolated to utilise facilities. Socialisation is a crucial aspect in improving the mental health and wellbeing of the population, especially those currently experiencing social isolation. New community facilities should also enhance feelings of safety through the use of passive surveillance.

Access to services: The policies proposed within this theme focus on improving and preserving access to services to all communities, which could assist in maintaining and improving the quality of life of a number of vulnerable groups, including the disabled, young people, old people, socially isolated, or those who have long term health conditions.

Policies under this theme support development proposals that maximise the opportunities for the provision of high-quality community facilities to serve a wide range of users. Services aim to be accessible to a wider community outside of core-hours to better meet the needs of different groups, delivering social value to the community. Additionally, the provision of multi-purpose and shared facilities such as sport and cultural facilities provide opportunities to integrate a range of community users and enhance social interactions.

Physical activity: Policy CI1: The council will expect development proposals to contribute to the capacity, quality, usability, inclusivity and accessibility of existing community facilities, particularly where development will increase demand. Community facilities include indoor sports and leisure facilities and have the potential to improve physical activity levels in the borough, leading to a potential reduction in incidents of obesity and the proportion of residents who are overweight. These positive effects could potentially impact across all demographic groups. Physical activity may be indirectly encouraged by the improved accessibility and safety of open spaces as brought about by the proposed policies.

Green Infrastructure: The policies outlined within the Community Infrastructure theme are unlikely to directly impact upon Green Infrastructure within LBTH due to the lack of policy relating to the inclusion of green infrastructure.

Climate change resilience: The policies outlined within the Community Infrastructure theme are unlikely to directly impact upon Climate change resilience within LBTH due to the lack of policy relating to the mitigation of climate risk factors like flooding and overheating.

Table 5-7 – Community Infrastructure Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
CL1	0	0	0	+	0	+	+	0	0	0	+ Children and young people Older people People with disabilities and mobility impairment People with existing health conditions Unemployed and low-income groups Socially excluded or isolated groups	The policy should ensure that improvements to existing community facilities are targeted so that all facilities meet the same standards of quality and service provision, ensuring all residents have access to facilities that meet their needs.
CL2	0	0	0	+	0	+	+	0	0	0	+ Children and young people Older people People with disabilities and mobility impairment People with existing health conditions Unemployed and low-income groups Socially excluded or isolated groups	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CL3	+	0	0	+	0	+	+	0	0	0	+ Children and young people Low income groups Socially excluded or isolated groups	New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility. All new community infrastructure developments will need to outline plans for the implementation of green infrastructure.
CL4	0	+	0	0	0	+	0	0	0	0	+ Younger people	No mitigation measures have been identified.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Older people	
CL5	0	0	0	0	0	0	0	0	0	0	No specific groups have been identified.	No mitigation measures have been identified.

5.9 Biodiversity and Open Space

Assessment Summary

- 5.9.1. The assessment identified the following social groups that could be affected by Biodiversity and Open Space policies:
- Children and young people;
 - Older people;
 - People with disabilities and mobility impairment; and
 - Socially isolated groups including new and expectant mothers.
- 5.9.2. Biodiversity and open space policies focus on enhancing open space throughout the borough in terms of quantity, quality, functionality and accessibility. These policies are anticipated to impacts on most health determinants, including positive effects for children and young people, older people, people with disabilities and mobility impairments, and socially isolated groups including new and expectant mothers.
- 5.9.3. The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough’s open spaces. Access to open spaces including parks as well as food growing spaces provides spaces for socially isolated groups like new and expectant mothers to meet and socialise.
- 5.9.4. Open spaces also provide ideal opportunities for recreation and leisure which will in turn promote physical activity and healthy lifestyles for the population. Physical activity in young children is particularly targeted through the improvement to play spaces throughout the borough.
- 5.9.5. Improved access to these spaces under this theme will enhance the benefit experienced through socialisation and physical activity opportunities.
- 5.9.6. Opportunities for education arise from the inclusion of the food growing policy, with young children particularly benefitting from this.
- 5.9.7. Climate change resilience is also considered under this theme, with urban greening positively contributing to the climate change resilience of the borough.

Biodiversity and Open Space Assessment

- 5.9.8. The assessment for Biodiversity and Open Space policies against each of the determinants of health have been outlined below.
- 5.9.9. **Air Quality:** Under this theme the air quality benefits of biodiversity are supported. Policy BO4: Biodiversity and access to nature, states that development proposals must enhance biodiversity and contribute to nature recovery within the borough. Urban greening and the provision of living building elements is considered especially beneficial in areas of sub-standard air quality throughout the borough. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents and workers in the borough.

- 5.9.10. **Noise:** There are unlikely to be any direct impacts upon noise as a result of the biodiversity and open space policies within LBTH.
- 5.9.11. **Housing and Homelessness:** There are unlikely to be direct impacts on housing due to biodiversity and open space policies within LBTH. Improved access to open space and food growing spaces for new housing development proposals may indirectly benefit the borough's housing stock. There are unlikely to be direct impacts on Homelessness due to the biodiversity and open space policies within LBTH.
- 5.9.12. **Economy and employment:** Well designed and accessible open spaces can offer valuable economic contributions to the borough. The safeguarding of water spaces throughout the borough under this theme enables the continuation of their positive contribution to the local economy. In relation to water, the Thames Vision set out by BO1: Green and blue infrastructure which promotes the management of the River Thames involves job creation associated with the river.
- 5.9.13. **Skills and education:** Policy BO7: Food growing, promotes opportunities for education via the provision of food growing spaces throughout the borough. Existing allotments will be protected under this policy and the provision of new food growing spaces maximised. There are unlikely to be direct impacts on Skills due to biodiversity and open space policies within LBTH.
- 5.9.14. **Social cohesion and community safety:** Preservation of existing open spaces including parks and the generation of new ones within the borough is likely to improve social cohesion by providing areas which foster opportunities for socialisation. This is most likely to benefit those who are socially isolated such as new and expectant mothers.
- 5.9.15. Policy BO7: Food growing is also likely to provide opportunities for social interactions across the borough. This will be especially beneficial for new and expectant mothers as they provide leisure and education for children, while being able to engage in social encounters themselves. Socially isolated groups are also likely to benefit from the social nature of gardening in communal spaces and on allotments.
- 5.9.16. The theme also involves improving access to such spaces, enabling even greater engagement and therefore beneficial impact from them.
- 5.9.17. Public realm enhancements under this theme include street crossing and other safety measures. Safety relating to water spaces is especially highlighted, including the provision of riparian lifesaving equipment such as grab chains and access ladders where necessary.
- 5.9.18. **Access to services:** Under this theme access to key services will be enhanced as part of a wider effort in public realm improvements associated with the Green Grid Strategy. Accessibility of the wider network by those with disability and mobility impairments is also considered.
- 5.9.19. **Physical activity:** All policies under this theme will positively contribute to the promotion of active and healthy lifestyles throughout the borough.

- 5.9.20. Preservation of existing open spaces including parks and the generation of new ones within the borough is likely to increase the number of people visiting open spaces and utilising these spaces for leisure and recreation. This is most likely to impact upon young people, adults, and older people who utilise these areas. This is also especially important to the Bangladeshi community, who currently are the most likely group in the borough to say that they do not have access to spaces with opportunities for play and recreation, the main reason being the lack of parks and green spaces in their local area²⁴.
- 5.9.21. Policy BO6: Play and recreation spaces recognises the importance of play spaces as key components in the physical activity levels and overall development of young children. The enhancement of recreational spaces for this purpose will aid in meeting the physical activity needs of the younger population in the borough.
- 5.9.22. **Green Infrastructure:** All policies under this theme positively contribute to the provision of green infrastructure. The theme primarily involves the maintenance and enhancement of green infrastructure provision throughout the borough. All existing open space will be protected, and in line with the Green Grid Strategy, will undergo quality, functionality and accessibility improvements. Opportunities to create new open space will also be maximised under this theme.
- 5.9.23. **Climate change resilience:** The NLP recognises that areas of biodiversity deficiency are particularly at risk of experiencing the Urban Heat Island effect. Urban greening as set out by this theme will positively contribute to climate change resilience throughout the borough.

Table 5-8 – Biodiversity and Open Space Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
BO1	+	+	0	+	0	+	+	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	No mitigation measures have been identified.
BO2	+	+	0	0	0	+	+	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	New parks and open spaces should be accessible to all members of the public. Design should especially consider the safety of women and young girls by including appropriate lighting, accessible pathways and access and egress points. Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility. Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.
BO3	0	0	0	0	0	+	0	0	+	+	No specific groups have been identified.	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
BO4	+	0	0	0	0	+	0	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
BO5	+	0	0	0	0	+	0	0	+	+	+ Low-income groups Socially excluded or isolated groups	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.
BO6	0	0	0	0	0	+	0	+	+	+	+ Children and young people People with disabilities and mobility impairment Low-income groups	<p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>The policy might encourage business and facilities to open in play and recreational spaces as well as ensure active travel routes increase the busyness of parks. A busier, more vibrant environment will lessen the prevalence of idle parks that promote fear in women, especially mothers.</p>
BO7	+	0	0	0	+	+	+	+	+	+	+ Socially excluded or isolated groups Low-income groups	Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.

5.10 Movement and Connectivity

Assessment Summary

- 5.10.1. The assessment identified the following social groups that could be affected by Movement and Connectivity policies:
- Low-income groups; and
 - Socially isolated groups including new and expectant mothers.
- 5.10.2. The Movement and connectivity policies outline improvements to travel options throughout the borough, facilitating the increase of active and sustainable modes of travel. These policies are anticipated to impacts on most health determinants, including positive effects for low-income groups and socially isolated groups including new and expectant mothers in particular.
- 5.10.3. The theme is particularly supportive of improvements to settings for social cohesion throughout the borough. Healthy streets will foster vibrant and lively communities where different social groups can socialise and enjoy public space together. Safety is also highlighted within this theme, with requirements that new connectivity developments do not adversely impact the safety of the boroughs existing walking and cycling network.
- 5.10.4. The theme is widely beneficial to the physical activity levels of different social groups across the borough. Improvements to accessibility and connectivity of current pedestrian routes will encourage residents to engage with active transport, having beneficial impacts for the overall health and wellbeing of the population. The inclusion of town centres within the 15-minute neighbourhood principle may also improve physical activity rates.
- 5.10.5. While climate change resilience is not directly built into the policies proposed under this theme, the reduced reliance on private vehicles brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough.

Movement and Connectivity Assessment

- 5.10.6. The assessment for Movement and Connectivity policies against each of the determinants of health are outlined below.
- 5.10.7. **Air Quality:** Sustainable travel as proposed by this theme aims to tackle the significant issues with air quality associated with highway congestion and capacity constraints across public transport networks. Improved access to public and active transport across the borough with the aim to reduce reliance on private vehicles will help relieve congestion and improve air quality. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents and workers in the borough.
- 5.10.8. **Noise:** In general, the encouragement of sustainable and active transport modes within these policies of are likely to reduce noise within LBTH. Specifically, road noise is likely to be reduced due to encouragement of a modal shift away from private car use.

- 5.10.9. Some developments supported by these policies could, if not well managed, increase noise pollution. However, Policy MC5: Sustainable delivery, servicing, and construction seeks to reduce the impact of delivery, servicing, and construction traffic on the environment and the health and well-being of residents, including in association with impacts of noise pollution. Housing and Homelessness: The policies outlined within the Movement and connectivity theme are unlikely to directly impact upon Housing and homelessness within LBTH.
- 5.10.10. Economy and employment: Policy MC5: Sustainable delivery, servicing, and construction seeks to support the deliveries and services that are essential to the economic growth of the borough.
- 5.10.11. Skills and education: The policies outlined within the Movement and connectivity theme are unlikely to directly impact upon Skills and education within LBTH.
- 5.10.12. Social cohesion and community safety: Numerous policies under this theme foster improved settings for social cohesion throughout the borough. In particular, the implementation of Healthy Streets supports many types of active travel, from commuting to work, to walking for pleasure, or cycling with children to school. Healthy streets will support vibrant and lively communities, where multiple social groups can come together to socialise and enjoy public spaces.
- 5.10.13. Additionally, the design and management of new connectivity development under this theme must ensure the development does not adversely impact the safety of the transport network throughout the borough. Development proposals that adversely impact the safety of the borough's walking and cycling network will not be supported. Improved settings for socialisation are particularly beneficial for socially isolated groups like new and expectant mothers.
- 5.10.14. Under policy MC5: Sustainable delivery, servicing, and construction, construction management plans and/or delivery and servicing plans are required to show how the Community Safety (CLOCS) standard has been incorporated.
- 5.10.15. Access to services: These policies are likely to improve overall connectivity within the borough, providing greater access to services and facilities.
- 5.10.16. The application of the Healthy Streets (Policy MC2: Active Travel and Healthy Streets) will help to simplify routes towards services for those who are elderly, disabled, or have sensory issues.
- 5.10.17. The improvement in public transport provision will improve access to other areas of the borough, as well as out of borough for those who routinely use public transport method.
- 5.10.18. This will most benefit young people, older people, those with disabilities, and socially isolated people, through allowing increased access to previously harder-to-access areas.
- 5.10.19. Physical activity: Healthy Streets, as proposed under this theme, supports many types of active travel; from commuting to work, to walking for pleasure, or cycling with children to school. This policy includes improvements to the accessibility and connectivity of

current pedestrian routes throughout the borough and into neighbouring boroughs. The support of such travel enables residents to engage in physical activity, having beneficial impacts for the overall health and wellbeing of the population.

- 5.10.20. Policies under this theme will work harmoniously with the borough's Transport Strategy to increase opportunities for active travel, with people becoming physically healthier. London has a 15-minute city concept, and the borough's location within inner London aims to align with this principle. Positive impacts will likely result from the encouragement of active travel such as walking or cycling to town centres due to their proximity to residential areas. The NLP will also provide delivery of high quality cycle provision and improved footways to support active travel.
- 5.10.21. In 2017/18, 33% of the poorest fifth of households in the UK did not have access to a car. On top of this, bus fares have increased by 47% since 2015. In accordance with this UK context for transport accessibility relating to finance, the 15-minute neighbourhood principle is beneficial for groups who struggle to afford public transportation costs such as low-income groups as it enables them to utilise active travel to get to work, generating significant cost savings.
- 5.10.22. Green Infrastructure: Policies under this theme commit to safeguard and contribute to maintaining and enhancing the borough's network of walking routes and cycleways, including the Thames Path and the Green Grid Network. The Green Grid Strategy works towards improving cross-borough connections, encouraging active travel and urban greening.
- 5.10.23. Climate change resilience: Reduced reliance on private vehicles as brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough.

Table 5-9 – Movement and Connectivity Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
MC1	+	+	0	+	+	+	+	+	+	+	+ Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	<p>Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that Cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users.</p> <p>In order to successfully encourage the uptake of public transport, bus stops should ideally be located so that nobody in the neighbourhood is required to walk more than 400 metres from their home as per the governments Guide to Best Practice on Access to Pedestrian and Transport Infrastructure.</p>
MC2	+	+	0	0	0	+	+	+	+	+	+ Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	<p>Active travel infrastructure should be accessible and inclusive.</p> <p>Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p>

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
MC3	+	+	0	0	0	+	+	0	0	0	+ Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	No mitigation measures have been identified.
MC4	0	0	0	+	0	0	+/-	0	0	0	+/- Older people People with disabilities and mobility impairment Low-income groups	It is recommended that the Purple Badge Scheme is implemented to ensure there will be no negative impacts on protected groups, such as disabled people. Management should protect priority bays to maintain accessibility for protected groups.
MC5	+	+	0	+	0	+	0	0	0	+	No specific groups have been identified.	No mitigation measures have been identified.

5.11 Reuse, Recycling and Waste

Assessment Summary

- 5.11.1. The assessment identified the following social groups that could be affected by Reuse, Recycling and Waste policies:
- All residents and workers
 - Older people
 - Children and young people.
- 5.11.2. Reuse, Recycling and Waste policies will have some positive effects on the health determinants identified across a selection of social groups within the borough.
- 5.11.3. Primarily, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions.
- 5.11.4. New and improved waste storage facilities in new housing developments will improve the housing stock of the borough. Unfortunately, existing houses will not necessarily see improvements of the same nature under this policy, and so the distribution of beneficial effects is limited.
- 5.11.5. Climate change resilience is encouraged in the design of waste management facilities through the encouragement attachment to the district heating network and/or incorporation of opportunities for energy recovery and combined heat and power.

Reuse, Recycling and Waste Assessment

- 5.11.6. The assessment for Reuse, Recycling and Waste policies against each of the key determinants of health have been outlined below.
- 5.11.7. **Air Quality:** Policy RW2: New and enhanced waste facilities, seeks to ensure that development proposals to construct new waste facilities do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
- 5.11.8. Waste facilities should incorporate an air filtering system to reduce airborne particulate concentrations in and outside of the building, in line with Environment Agency advice. The policy also seeks to mitigate adverse air quality impacts associated with waste facilities. Improvements to air quality will be particularly beneficial for older people, infants, and those with long term health conditions.
- 5.11.9. Policies seek to locate waste facilities as far away as possible from sensitive receptors (such as residential uses, schools, nurseries, and health facilities), and seek to mitigate adverse air quality impacts associated with waste facilities. Policy RW2 also seeks to minimise amenity impacts on surrounding areas in terms of air quality and impacts on the transport network, according with Agent of Change principles.

- 5.11.1. **Noise:** Policy RW2: New and enhanced waste facilities, seeks to ensure that development proposals to construct new waste facilities do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.
- 5.11.2. **Housing and Homelessness:** RW3 Waste storage facilities within new housing developments should be designed to avoid any adverse amenity impacts. Existing homes will not necessarily see improvements of the same nature under this policy, limiting the distribution of beneficial effects.
- 5.11.3. **Economy and employment:** Under this theme, development proposals to construct new waste facilities that demonstrate effective implementation of the waste hierarchy and its contribution to the circular economy will be supported. Waste-derived recycled materials are a key option for recovering value throughout the supply chain in relation to the circular economy.
- 5.11.4. **Skills and education:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Skills and education within LBTH.
- 5.11.5. **Social cohesion and community safety:** Development proposals that demonstrate accordance with Agent of Change principles to minimise amenity impacts on surrounding areas will be supported (RW2). Additionally, the locating of waste facilities away from residential areas will be beneficial to the health and safety of residents.
- 5.11.6. **Access to services:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Access to services within LBTH.
- 5.11.7. **Physical activity:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Physical activity levels within LBTH.
- 5.11.8. **Green Infrastructure:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon green infrastructure within LBTH.
- 5.11.9. **Climate change resilience:** To minimise the impact on climate change, waste management facilities under this theme are encouraged to incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power.

Table 5-10 – Reuse, Recycling and Waste Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<i>Reuse, recycling and waste</i>												
RW1	0	0	0	+	0	+	0	0	0	+	No specific groups have been identified.	No mitigation measures have been identified.
RW2	+	+	0	+	0	+	0	0	0	+	No specific groups have been identified.	No mitigation measures have been identified.
RW3	0	0	+	+	0	0	0	0	0	+	No specific groups have been identified.	Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management.

6 Conclusion

6.1 Summary

- 6.1.1. On the whole the NLP is likely to result in a number of positive effects across the determinants of health and vulnerable groups, however there is potential for some policies to have adverse effects. A summary of the key effects has been detailed below:
- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Future policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads, which could contribute to a worsening of air quality. However, all construction sites in the borough will be expected to meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice in relation to dust and air quality.
 - **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, contributing to increased road traffic noise in the area. Improvements to entertainment venues and the night-time economy will also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction and developments throughout the Borough, reducing the levels of nuisance felt to those living in close proximity to developments.
 - **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for the Future theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation. This could have positive effects for many vulnerable groups, predominantly working aged adults (18-74) and those who are homeless.
 - **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the Borough. In particular, the provision and protection of affordable workspaces will aid in supporting new and emerging economic sectors in the borough. Additional town centre developments and an increase in shops, entertainment venues and food and drink facilities under the NLP is also likely to reduce unemployment in the Borough, having positive effects for the unemployed and low-income residents in the Borough.
 - **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access

to education and training. Upskilling opportunities will be particularly beneficial to the health of young people throughout the borough.

- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces theme include safety measurements such as appropriate signage of public areas, good lighting and surveillance. The promotion of a safe living environment will contribute positively to the physical and mental wellbeing of all residents.
- **Access to services:** Positive health effects have been identified. It is assumed that new community housing developments within the Borough will have suitable access to community facilities and shops. Additionally, policies under the Community Infrastructure theme support development proposals to maximise opportunities for the provision of high-quality community facilities. Access to services will improve the health of elderly residents, improving health and reducing loneliness.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel, from commuting to work to walking for pleasure. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population. Further, the inclusion of town centres within the 15-minute neighbourhood principle may improve physical activity rates.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policies. This includes the protection and enhancement of existing biodiversity throughout the borough as well as new provisions to contribute a 30% Biodiversity Net Gain (BGN). The maintenance of green infrastructure and accessible open spaces contributes to improving mental wellbeing by providing spaces for physical activity and social interaction. Green infrastructure could be further promoted through additional requirements under the Homes for the Community theme.
- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the Borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

6.2 Recommendations

6.2.1. A number of recommendations have been identified which have been outlined in Table 6-1 below. These changes will be considered by LBTH during the preparation of the preferred plan for Regulation 19 consultation.

Table 6-1 – HIA Recommendations

Policy/ Theme	Recommendation
Policy DV6	Social value contributions would be enhanced through specific implementation of plans to encourage communities meaningful engagement in local and regional decision-making.
Policy HF1	Tenants should be limited to one private vehicle per household. Housing needs should be considered to include Electric Vehicle Charging Facilities. This way, residents are encouraged and supported to switch to electric vehicles for private usage and the potential adverse air quality impacts of new housing and associated increases in vehicle emissions will be lessened.
Policy HF1	Increased demand on services throughout the borough as a result of the growing population will require the strengthening of services. This should take the form of provision of new facilities as well as the employment of additional staff.
Policy HF6	All purpose-built student accommodation should have a noise nuisance curfew in place between 11pm and 7am. This should be communicated to all new residents upon the start of their tenure as well as potential penalties they could face in instances of breaking the curfew.
Policy CG4	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers. Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
Policy PS1	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
Policy PS2	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.

Policy/ Theme	Recommendation
	Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
Policy PS10	Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.
Policy TC7	More emphasis should be placed on ensuring that nighttime uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.
Policy CI1	The policy should ensure that improvements to existing community facilities are targeted so that all facilities meet the same standards of quality and service provision, ensuring all residents have access to facilities that meet their needs.
Policy CI3	All new community infrastructure developments will need to outline plans for the implementation of green infrastructure.
Policy BO2	<p>New parks and open spaces should be accessible to all members of the public. Design should consider safety by including appropriate lighting, accessible pathways and access and egress points.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p>
Policy BO6	<p>Part 2 (b) could include mention of suggested measures to tackle barriers to inclusion and equality.</p> <p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p>
Policy BO7	Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.



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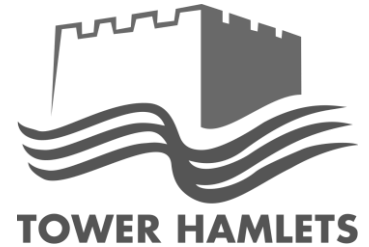
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London Borough of Tower Hamlets

New Local Plan (Regulation 19)

Habitats Regulations Assessment



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New Local Plan (Regulation 19)

Habitats Regulations Assessment

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Appendix A

CJEU Rulings

Appendix B

Habitats Sites Details, Including Qualifying Features and Conservation Objectives

Appendix C

APIS Information for SPA and SAC Sites within 7.2km of the Allocated Sites (2023 data)

Appendix D

Annual Mean NOX Concentrations

1 Introduction

- 1.1.1 The London Borough of Tower Hamlets (hereafter referred to as LBTH) is in the process of preparing a new Local Plan for the Borough.
- 1.1.2 The current Local Plan was adopted in January 2020 and covers the period up to 2031¹. Under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), Councils are required to regularly review and update their Local Plans to ensure that they are fit for purpose. Therefore, the LBTH is currently preparing a new Local Plan to guide development within the borough up to 2038. The Local Plan will identify the location, scale and uses of development that will come forward within the borough and demonstrate how the needs of Tower Hamlet's current and future population will be met. This includes a target to secure delivery of at least 52,095 new homes across the borough between 2023 and 2038, which includes a proportion (34,730 homes) set by the London Plan (2021)² as part of a ten-year housing target (for the period 2019/20 to 2028/29).
- 1.1.3 Prior to adoption, the new Local Plan must go through several stages of review, consultation and engagement. This includes: initial preparation and consultation on what the Local Plan should contain (Regulation 18), production of a Publication Draft Local Plan (Regulation 19), submission of the Local Plan to the Secretary of State for Housing, Communities and Local Government (Regulation 22), and finally public examination (Regulation 24). Consultation on the Regulation 18 version on the Local Plan took place between 6th November and 18th December 2023 and the Council are currently preparing the Regulation 19 Consultation Draft.
- 1.1.4 The Local Plan is a statutory document³ that forms part of the Council's strategy to deliver sustainable development, tackle climate change and deliver new homes, jobs and infrastructure for current and future LBTH residents. Local Plans must be positively prepared, justified, effective and consistent with national policy, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF)⁴.

¹ London Borough of Tower Hamlets (2020) Tower Hamlets Local Plan 2031. Managing growth and sharing the benefits. Available at: [Local plan \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk/local-plan)

² Mayor of London (2021) The London Plan. Available at [the_london_plan_2021.pdf](https://www.london.gov.uk/what-we-do/what-we-plan/the-london-plan-2021)

³ Section 19 of the Planning and Compulsory Purchase Act 2004 sets out specific matters to which the local planning authority must have regard when preparing a local plan. Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the general form and content of local plans and adopted policies maps, while [regulation 10](#) states what additional matters local planning authorities must have regard to when drafting their local plans.

⁴ The National Planning Policy Framework 2023. Available online: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 1.1.5 The Local Plan sits within a wider framework of planning documents, including national guidance set out by the government in the NPPF (as referenced above), regional and city planning policies and guidance, strategic plans, supporting strategies and background studies. The Local Plan will form the basis on which planning applications will be determined within LBTH’s administrative area.
- 1.1.6 WSP has been appointed by LBTH to undertake the Habitats Regulations Assessment (HRA) for the Local Plan, which has progressed to the Regulation 19 stage. The focus of the HRA process is on identifying the potential for adverse effects as a result of the Local Plan policies on the integrity of European nature conservation sites and other designations addressed through HRA as a matter of policy (hereafter referred to as “Habitats sites”).
- 1.1.7 Under The Conservation of Habitats and Species Regulations 2017⁵ (as amended) (the ‘Habitats Regulations’) ‘Competent Authorities’ must assess plans and projects for their potential to cause Likely Significant Effects (LSE) on Habitats sites. Where the plan or project may lead to LSE it must be subject to an Appropriate Assessment to determine whether there will be adverse effects to any Habitats sites.
- 1.1.8 This exercise identifies all relevant Habitats sites where LSE could occur and the information captured here will form the evidence base for this Stage 1 HRA (Screening). Further consideration of LSE is then provided within the Stage 2 Appropriate Assessment (see Methodology Section 2).

1.2 Report Framework

- 1.2.1 This HRA screening report has been produced as a part of the Integrated Impact Assessment (IIA) that incorporates the requirement of a Strategic Environmental Assessment (SEA) for the Local Plan and associated plans.
- 1.2.2 At a screening level, this report will ensure that all HRA-related considerations are fully integrated into the Local Plan documents as they develop.
- 1.2.3 This report details:
 - the HRA process and methodology for assessment;
 - the relevant Habitats sites within the Zone of Influence (Zol) for the Local Plan policies;
 - the challenges of the Local Plan policies and how these may impact upon relevant Habitats sites;

⁵ The Conservation of Habitats and Species Regulations 2017. Available at: [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

- the screening of LSE (Stage 1) of the Local Plan policies (including reference to the supporting report *Air Quality Information Report to Support Habitats Regulations Assessment*⁶), and;
- The consideration of potential adverse effects on site integrity within Stage 2 Appropriate Assessment (including reference to the supporting report *Air Quality Information Report to Support Habitats Regulations Assessment*, (WSP 2024).

1.2.4 It should be noted that this HRA has been based solely upon the LBTH New Local Plan policies and does not replace a detailed analysis of any projects that may be brought forwards subsequent to the New Local Plan where additional LSE may arise.

1.3 The LBTH Local Plan

1.3.1 The New Local Plan sets out a vision for the future of the Borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of our environment, green spaces and cultural and historic assets.

1.3.2 Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the Borough will develop through to 2040. Further details relating to the Local Plan, including the Local Plan vision and objectives are set out within the Interim Integrated impact Assessment Report (WSP, 2023).

1.3.3 The Local Plan policies which are the focus of this screening exercise are listed in Table 1-1, provided by LBTH. A brief summary of each policy is also given in the screening Table 7-3 Section 7.

Table 1-1 – Proposed LBTH Local Plan policies screened in the HRA

Policy number	Title
Delivering on the Local Plan	
DV1	Areas of growth and opportunity within Tower Hamlets
DV2	Delivering sustainable growth in Tower Hamlets

⁶ *Air Quality Information Report to Support Habitats Regulations Assessment – London Borough of Tower Hamlets New Local Plan (Regulation 19)*, WSP, June 2024

Policy number	Title
DV3	Healthy communities
DV4	Planning and construction of new development
DV5	Developer contributions
DV6	Social value
DV7	Utilities and digital connectivity
DV8	Site Allocations
Homes for the Community	
HF1	Meeting housing needs
HF2	Affordable housing and housing mix
HF3	Protection of existing housing
HF4	Supported and specialist housing
HF5	Gypsy and traveller accommodation
HF6	Purpose-built student accommodation
HF7	Large-scale purpose-built shared living
HF8	Housing with shared facilities (houses in multiple occupation)
HF9	Housing Standards and Quality
Clean and Green Future	
CG1	Mitigating and adapting to a changing climate
CG2	Low energy buildings
CG3	Low carbon energy and heating
CG4	Embodied carbon, retrofit and the circular economy
CG5	Overheating
CG6	Managing flood risk
CG7	Sustainable drainage

Policy number	Title
CG8	Water efficient design
CG9	Air quality
CG10	Noise and vibration
CG11	Contaminated land
People Places and Spaces	
PS1	Design and infrastructure-led approach to development
PS2	Tall Buildings
PS3	Securing design quality
PS4	Attractive streets, spaces and public realm
PS5	Creating inclusive places
PS6	Heritage and the historic environment
PS7	World heritage sites
PS8	Shaping and managing views
PS9	Shopfronts
PS10	Advertisements, hoardings and signage
PS11	Siting and design of telecommunications infrastructure
Employment and economic growth	
EG1	Creating investment and jobs
EG2	New employment space
EG3	Affordable workspace
EG4	Loss and redevelopment of employment space
EG5	Railway Arches
EG6	Data Centres
Town Centres	

Policy number	Title
TC1	Supporting the network and hierarchy of centres
TC2	Protecting the diversity, vitality and viability of town centres
TC3	Town centre uses outside our town centres
TC4	Markets
TC5	Food and drink
TC6	Entertainment uses
TC7	Evening and night-time activities
TC8	Short-stay accommodation
Community Infrastructure	
CI1	Supporting community facilities
CI2	Existing community facilities
CI3	New and enhanced community facilities
CI4	Public houses
CI5	Arts and Culture facilities
Biodiversity and open space	
BO1	Green and blue infrastructure
BO2	Open spaces and the Green Grid network
BO3	Water spaces
BO4	Biodiversity and access to nature
BO5	Urban greening
BO6	Play and recreation spaces
BO7	Food growing
Movement and Connectivity	
MC1	Sustainable travel

Policy number	Title
MC2	Active travel and healthy streets
MC3	Impacts on the transport network
MC4	Parking and permit-free
MC5	Sustainable delivery, servicing and construction
Reuse, Recycling and Waste	
RW1	Managing our waste
RW2	New and enhanced waste facilities
RW3	Waste collection facilities in new development

2 Relevant policy, legislation, case law and guidance

2.1 Legislative Background

- 2.1.1 Under The Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations') 'Competent Authorities' must assess Plans and projects for their potential to cause LSE on Habitats sites. Where the plan or project may lead to LSE it must be subject to an Appropriate Assessment to determine whether there will be adverse effects to any Habitats sites. Any plan or project that would lead to adverse effects on the integrity of Habitats site(s) cannot be permitted without meeting strict additional tests.
- 2.1.2 Defra guidance⁷ states that Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a National Site Network (NSN) on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:
- existing SACs and SPAs; and
 - new SACs and SPAs designated under these Regulations.
- 2.1.3 Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new NSN.
- 2.1.4 It is a matter of Government policy (NPPF paragraph 118) that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (commonly known as Ramsar sites) are also considered in the same way as Habitats sites. Together, these sites are referred to as 'Habitats sites' in the NPPF and in this report.
- 2.1.5 Other site designations of national or local importance are not assessed by the HRA process, but with respect to Sites of Special Scientific Interest (SSSI) these designations largely overlap with European or Ramsar sites.
- 2.1.6 Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:
- fulfil the commitment made by government to maintain environmental protections; and
 - continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

⁷ Defra Policy Paper Changes to the Habitats Regulations 2017 (Published 1 January 2021). Available online: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

- 2.1.7 This report presents information to enable the screening assessment required as part of Stage 1 of the HRA process, to establish whether or not the LBTH Local Plan will have a LSE upon the NSN and Habitats sites.
- 2.1.8 The principle of Favourable Conservation Status (FCS) of features within Habitats sites as set out in the original Habitats Directive⁸ is central to this assessment. The use of the term FCS is not amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the term still has the meaning given by Article 1 of the Habitats Directive. Defra guidance⁹ does however note that:

“an appropriate authority is only responsible for managing and adapting the national site network to secure FCS of a feature proportionately to the importance of the UK within the feature’s natural range”.

- 2.1.9 The Habitats Directive provides further interpretation of the meaning of ‘favourable conservation status’ within Article 1 parts a, e and i as below.

‘(a) conservation means a series of measures required to maintain or restore the natural habitats and the populations of species of wild fauna and flora at a favourable status as defined in (e) and (i);.....

(e) conservation status of a natural habitat means the sum of the influences acting on a natural habitat and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species within the territory referred to in Article 2. The conservative status of a natural habitat will be taken as "favourable" when:

- *its natural range and areas it covers within that range are stable or increasing, and*
- *the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and*
- *the conservation status of its typical species is favourable as defined in (i);*

(i) conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within the territory referred to in Article 2; The conservation status will be taken as "favourable" when:

⁸ The Habitats Directive, European Commission. Available online:

https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

⁹ Defra Policy Paper Changes to the Habitats Regulations 2017 (Published 1 January 2021). Available online:

<https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

- *population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and*
- *the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and*
- *there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis’.*

2.2 Stages of Habitats Regulations Assessment

2.2.1 Guidance on managing Natura 2000 sites and the provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC¹⁰ (2018) sets out the step-wise approach which should be followed to enable Competent Authorities to discharge their duties under the Habitats Directive and provides further clarity on the interpretation of Articles 6 (3) and 6 (4), as presented below (with additional interpretation in brackets).

Article 6(3) defines a step-wise procedure for considering plans and projects.

a) The first part of this procedure consists of a pre-assessment stage (‘screening’) to determine whether, firstly, the plan or project is directly connected with or necessary to the management of the site, and secondly, whether it is likely to have a significant effect on the site; it is governed by Article 6(3), first sentence. *(Often commonly referred to in practice as HRA Stage 1 – Screening)*

*b) The second part of the procedure, governed by Article 6(3), second sentence, relates to the Appropriate Assessment** and the decision of the competent national authorities. (A simplified flow chart of this procedure is presented in Annex II at the end of the guidance document). **(Often commonly referred to in practice as HRA Stage 2 – Appropriate Assessment)*

A third part of the procedure (governed by Article 6(4)) comes into play if, despite a negative assessment, it is proposed not to reject a plan or project but to give it further consideration. In this case Article 6(4) allows for derogations from Article 6(3) under certain conditions.

The applicability of the procedure, and the extent to which it applies, depend on several factors, and in the sequence of steps, each step is influenced by the previous step. The order in which the steps are followed is therefore essential for the correct application of Article 6(3).

2.2.2 As set out in Regulation 3 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 where Natura 2000 sites are referenced in previously issued

¹⁰ Commission Notice C(2018) 7621 final, Brussels, 21.11.2018 *Managing Natura 2000 sites - The provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC* Available in all EU languages from: http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm

guidance, this should be interpreted as relating to the national site network but does not otherwise affect guidance as it applied, before EU exit day.

- 2.2.3 Under the Habitats Regulations in England and Wales the approach taken to the stage referred to as ‘derogation’ follows the same fundamental steps as established above in EC Guidance, comprising consideration of alternative solutions, IROPI, and compensatory measures.

2.3 Relevant Case Law

- 2.3.1 There are a number of recent Court of Justice of the European Union (CJEU) rulings which are relevant to this assessment and these are given below for information. As the general provisions for the protection of Habitats sites and the procedural requirements to undertake HRA to assess the implications of Plans or Projects for Habitats sites remain, this previous case law established prior to the UK's exit from the EU is considered to apply unless superseded by the judgement of an appropriate UK court.

The Wealden Judgement

- 2.3.2 The Wealden Judgement¹¹, handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.
- 2.3.3 Prior to this Judgement, it was deemed that air quality impacts on Habitats sites need only be considered alongside roads where the traffic growth associated with the individual Plan or project being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07¹²) which has been subsequently withdrawn, namely:
- Increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).
- 2.3.4 The Wealden Judgement found that the application of the criteria to the traffic growth associated with a single Local Plan was unsound on the basis that two Local Plans collectively contributing more than 1000 AADT could lead to a potentially significant effect. The Judge determined that further assessment of air quality impacts on Habitats sites should have been carried out and quashed part of the Local Plan that would have led to an

¹¹ Judgment in *Wealden District Council v. Secretary of State for Communities and Local Government*, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.

¹² *Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)*. Withdrawn, but available at: <https://standardsforhighways.co.uk/dmrb/archive/search/df0c77ed-887b-4c84-be0e-000fe18545ae>

in-combination exceedance of 1,000 AADT.

The People over Wind Case

- 2.3.5 The Court of Justice of the European Union’s (CJEU’s) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17)¹³ (hereafter referred to as the ‘Sweetman Case’), states that: ‘Article 6(3) must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.’
- 2.3.6 In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.
- 2.3.7 This is an emerging issue for local authorities and means that, alongside the Wealden judgement and the potential for ‘in-combination’ effects, the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats sites, full Appropriate Assessment is more frequently required.

Cjeu Ruling in The Netherlands Nitrogen and Agriculture Cases C-293/17 And C-294/17

- 2.3.8 The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality. Notably, the Court of Justice of the European Union ruled that:
 - An ‘Appropriate Assessment’ may only take into account the existence of Article 6(1) ‘conservation measures’, or Article 6(2) ‘preventive measures’, or specific measures adopted for a conservation programme, or ‘autonomous’ measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.

¹³ Judgement of the Court 12 April 2018, People Over Wind, Peter Sweetman, Coillte Teoranta <https://curia.europa.eu/juris/document/document.jsf?jsessionid=B02FE6F4F1C61308615DBBDF079EE5F4?text=&docid=200970&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=11190634>

- National measures such as procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying with Article 6(2).

2.4 National Planning Policy

2.4.1 National Planning Policy Framework

2.4.2 In relation to biodiversity and the Draft LTP, the following paragraphs in the document are relevant:

- Paragraph 180, which states ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - (c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’

- Paragraph 181 which states ‘Plans should:

distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.’

2.5 Relevant Guidance (Primary Resources)

2.5.1 Natural England's Internal Guidance

2.5.2 In June 2018, Natural England published guidance¹⁴ on their approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. The document draws upon Annex F of the DMRB (now withdrawn) but takes into account the Wealden Judgement and need to assess 'in-combination' effects on Habitats sites as a result of air pollution.

2.5.3 The guidance provides a framework around the assessment of road traffic emissions and subsequent effects on Habitats sites. Notably:

- Step 1 – Does the proposal give rise to emissions which are likely to reach a Habitats Site;
- Step 2 – Are there qualifying features within 200m of a road sensitive to air pollution;
- Step 3 – Could the sensitive qualifying features of the site be exposed to emissions; and
- Step 4 – Application of the Screening Thresholds.
 - Step 4a: apply the threshold alone;
 - Step 4b: apply the threshold in-combination with emissions from other road traffic plans and projects; and
 - Step 4c: apply the threshold in-combination with emissions from other non-road plans and projects.
- Step 5: Advise on the need for Appropriate Assessment where thresholds are exceeded, either alone or in-combination.

2.5.4 The relevant thresholds in relation to Step 4 are as follows:

- Changes in AADT of 1000 vehicles a day (or more); and/or
- Changes of 1% of the relevant Critical Load and/or Level as a result of the Plan/Project.

2.5.5 IAQM's GUIDE To the Assessment of Air Quality Impacts on Designated Nature Conservation Sites

2.5.6 The Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites (IAQM, May 2020)¹⁵ provides advice for ecologists relating to air quality assessments (AQAs), to evaluate the effects of air pollution on habitats and species, by increasing their

¹⁴ Natural England (June 2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations at: <http://publications.naturalengland.org.uk/publication/4720542048845824>

¹⁵ Holman et al (2020). *A guide to the assessment of air quality impacts on designated nature conservation sites – v1.1* Available at: <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf>

understanding of the information provided by air quality specialists. The Guide focusses on the AQA process and no specific detail on the subsequent stage of the overall process, i.e. the assessment of the effects that air quality impacts may have on habitats and species, is provided in this guidance.

2.5.7 Updated DMRB (LA 115 – Habitats Regulations Assessment)

2.5.8 DMRB document LA 115 - Habitats Regulations Assessment¹⁶ states that HRA shall include systematic collection, assessment, and reporting of the implications of highways projects on Habitats sites and shall be implemented forthwith on all projects involving HRA on the motorway and all-purpose trunk roads. In addition to identifying the habitats site designations to be considered within HRA and the format of reporting, the document sets out (principles and purpose) that:

- The precautionary principle shall be applied in reporting through all HRA stages.
- Recourse to the precautionary principle may be relevant when there:
 1. are "potentially negative effects"; or
 2. is "insufficiency of the data, which makes it impossible to determine with sufficient certainty the risk in question".
- Site conservation objectives should prevail where there is uncertainty.
- Adverse effects should be reported in the HRA in the absence of evidence to the contrary.

2.5.9 CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

2.5.10 This guidance¹⁷ from the Chartered Institute of Ecology and Environmental Management is intended to take ecologists (and air quality specialists) through the issues that they should consider in order to make an informed judgement as to the ecological effects of changes in pollution concentrations and deposition rates. The approaches set out build on the advice and guidance from Natural England and IAQM, but focus on the ecologist role to interpret the numerical output of air quality assessments to reach evidence-based conclusions on ecological significance.

¹⁶ Highways England (November 2019) Design Manual for Roads and Bridges, LA115 – Habitats Regulations Assessment. Available at: <https://standardsforhighways.co.uk/dmrp/search/e2fdab58-d293-4af7-b737-b55e08e045ae> .

¹⁷ CIEEM (January 2021) *Advisory Note: Ecological Assessment of Air Quality Impacts*. Available at: <https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/#:~:text=Advisory%20Note%3A%20Ecological%20Assessment%20of%20Air%20Quality%20Impacts..of%20changes%20in%20pollution%20concentrations%20and%20deposition%20rates> .

2.5.11 Additional guidance

2.5.12 Multiple sources of guidance are available to HRA practitioners which are specific to interpretation of assessment processes or technical areas of assessment. Where relevant, these are cited within this report.

3 Methodology

- 3.1.1 This report presents the findings of the Screening undertaken as part of Stage 1 of the HRA process to establish whether or not the likely impacts of the LBTH Local Plan could have LSE on Habitats sites.
- 3.1.2 This document provides this information by undertaking the following steps:
- determining whether the Plan is directly connected with or necessary for the management of applicable Habitats sites;
 - describing the Plan impacts that may have the potential for significant effects upon applicable Habitats sites; and
 - describing the potential pathways of impacts, both alone and in-combination with other plans and projects.
- 3.1.3 The precautionary principle is applied at all stages of the HRA process. In relation to screening this means that plans and projects where effects are considered likely and those where uncertainty exists as to whether effects are likely to be significant must be subject to the second stage of the HRA process, Appropriate Assessment.
- 3.1.4 The first step of the review is to establish whether the LBTH Local Plan should be subject to HRA.
- 3.1.5 Depending on the conclusion of this step, the assessment progresses to information gathering; in particular the identification of Habitats sites which will likely require consideration and on which background information is collated. This information includes the qualifying features of these sites, the conservation objectives and the sensitivities of those sites.
- 3.1.6 As part of the information gathering stage, in the assessment of Local Plans consideration is generally given to the air quality sensitivities of these Habitats sites, specifically their qualifying features, to changes in both nitrogen oxide (NO_x) and ammonia (NH₃) concentrations and nitrogen (N) deposition and then consideration of these changes in relation to the Critical Level and relevant Critical Loads¹⁸.
- 3.1.7 For those Habitats sites with identified pressures or threats associated with air quality, further detailed assessment is provided within the supporting *Air Quality Information Report to Support Habitats Regulations Assessment* (WSP, 2024) and summarised here.
-

¹⁸ Critical Loads and Levels are metrics used for assessing the risk of air pollution impacts to sensitive vegetation and ecosystems.

3.1.8 The final element of the information gathering stage is to review the availability of relevant data sets and sources which will form the evidence base of the assessment of the Local Plan policies alone and in-combination with other relevant plans and projects. Information on sources of HRA guidance are given below and the legislative and policy background including the relevant CJEU rulings, are given in Appendix A.

4 Review Results

4.1 Is HRA required?

4.1.1 The review looked to specifically answer each of the questions set out in the HRA review methodology. It should be noted that the level of detail of the Local Plan only allows for an anticipated assessment of the need for HRA based on experience of similar plans and projects (see Table 4-1 below).

Table 4-1 – Is HRA required?

	Question	Response
1	Is the whole of the plan directly connected with or necessary to the management of a Habitats site for nature conservation purposes?	No
2	Is the plan a 'strategic development plan' or 'local development plan' or 'supplementary guidance' or a core path plan or a revision thereof?	Yes
3	Does the plan provide a framework for deciding applications for project consents and / or does it influence decision makers on the outcome of applications for project consents?	Yes
4	Does the plan contain a programme, or policies, or proposals which could affect one or more particular Habitats site?	Yes
5	Is the plan a general statement of policy showing only the general political will or intention of the plan-making body, and no effect on any particular Habitats site can reasonably be predicted?	No

4.1.2 When the answer to either questions (1) or (5) is 'no', but the answer to any of questions (2), (3) or (4) is 'yes', then the requirement for further HRA is identified.

4.1.3 In this case, the answers to questions (1) and (5) are both 'no', while the answers to questions (2) to (4) are all 'yes'. It is therefore confirmed based on the availability of current information that the LBTH Local Plan does therefore require HRA.

5 Review of Habitats sites

5.1.1 The following section provides a summary of the results of the review of Habitats sites data which will form the baseline for subsequent stages of HRA.

5.2 Habitats sites

5.2.1 It is necessary to consider all the Habitats sites that form part of the NSN (SACs, SPAs and proposed or candidate SPAs or SACs, expanded by the NPPF to include Ramsar sites) within a broad area or Zol of the Local Plan and the specific policies therein.

5.2.2 The Zol is defined by the potential effects arising from the project or plan and the available pathways for those effects to reach and impact the interest features of Habitats sites.

5.2.3 In order to identify all strategic corridors where potential direct, indirect and in-combination effects could reasonably be considered possible, a Zol buffer is set up around the primary activities, or in this case Policies, which are likely to affect the qualifying features of Habitats sites.

5.2.4 LBTH has provided an indicative list of site allocations and reasonable alternative to meet the housing needs of the Borough. These have been used as the primary basis on which to set up the Zol and assume:

- dispersal of development across the Borough as shown on Figure 1 (including both Proposed Allocations and Reasonable Alternatives); and
- delivery of at least 52,095 new homes across the borough between 2023 and 2038, which includes a proportion (34,730 homes) set by the London Plan (2021) as part of a ten-year housing target (for the period 2019/20 to 2028/29).

5.2.5 The Zol are set up to reflect the potential impact or effects pathways of the Qualifying features of the Habitats sites. A Zol of 7.2km has been applied around the Borough boundary to identify all habitats sites in proximity, and then refined to within 7.2km of allocated sites identified within the Local Plan. The premise of this approach is that 7.2km represents the average distance travelled for office use, as per the Air Quality Neutral Guidance¹⁹ with specific reference to Inner London (for which LBTH falls within). Whilst average distance travelled is also provided for residential (3.4km) and retail (5.5km) use, the application of 7.2km (reflective of office use in Inner London) is considered equally suitably precautionary to identify potential impacts from other pressures or threats to Habitats sites, when considering Habitats sites for inclusion in Stage 1 Screening

¹⁹ Greater London Authority (2023) London Plan Guidance: Air Quality Neutral [online]. Available at: <https://www.london.gov.uk/sites/default/files/2023-02/Air%20Quality%20Neutral%20LPG.pdf>

- 5.2.6 Consideration has been given to whether this Zol is inclusive of other LSE which may arise, including recreational pressure which may also cover an extensive area. Visitor surveys have shown that this recreational access Zol, when applied to visitor numbers at to the 75th percentile, extends to an approximate maximum 7km figure (depending on survey year and location)(Liley, D 2020) for sites considered in this assessment. The selected 7.2km Zol is therefore considered appropriately precautionary to support the Screening approach for the assessment overall.
- 5.2.7 For air quality considerations and traffic generation or re-distribution, the London Air Quality Neutral (AQN) Guidance²⁰ sets out recommended average journey lengths for key land uses based on their location within London. These are summarised in **Table 5-1** below.
- 5.2.8 For the most part, the applicable values for the LBTH will be those set for ‘Inner London’ and these values have been used to define the bespoke Zol for the site allocations, based on the proposed land uses / development descriptions. However, it is noted that a small part of Tower Hamlets (along the western-most edge) technically falls within the boundary of the Central Activity Zone (CAZ). There are two allocations that sit wholly within the CAZ (allocations 1.1 Bishopsgate Goods Yard and 1.5 London Metropolitan University). As such, the ‘CAZ’ values have been used to define the bespoke Zol for these sites. A third allocation (1.7 Brick Lane and Pedley Street) also straddles the boundary of the CAZ. However, as the majority of this site lies outside of the CAZ, the ‘Inner London’ values are considered most appropriate to the overall setting and have been used for the Zol.

Table 5-1 – Average distance (km) travelled by car per trip

Land Use	CAZ	Inner London	Outer London
Residential	4.2	3.4	11.4
Office	3.0	7.2	10.8
Retail	9.2	5.5	5.4

- 5.2.9 To ensure a conservative approach to the assessment, where a development is mixed-use, a precautionary approach has been applied whereby the worst-case (i.e. longest) average distance travelled has been applied (i.e. 7.2km for Inner London and 9.2km for the CAZ).
- 5.2.10 Three Habitats sites, as presented in Table 5-2, lie within this potential Zol for the LBTH Local Plan, including one SPA, one SAC and one Ramsar site.

²⁰ Mayor of London (February 2023) London Plan Guidance. Air Quality Neutral.

5.2.11 The reasons for designation of the screened-in Habitats sites and their known vulnerabilities are given in Appendix B, which has been collated from the Natura 2000 standard data forms and the Natural England Site Improvement Plans.

5.2.12 With regard to the qualifying features and information on vulnerability of the Habitats sites detailed in Appendix B, the broad conservation objectives for SACs and SPAs are to:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species.*
- *The structure and function (including typical species) of qualifying natural habitats.*
- *The structure and function of the habitats of qualifying species.*
- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.*
- *The populations of qualifying species; and*
- *The distribution of qualifying species within the site.*

5.2.13 Specific conservation objectives for Ramsar sites are not currently available.

5.2.14 The Habitats sites which fall within the identified Zol of the LBTH boundary are listed in Table 5-2.

Table 5-2 – Habitat sites falling within the 7.2km Zol of LBTH boundary

Habitats sites (SPA and Ramsar)	Habitats sites (SAC)
Lee Valley	Epping Forest

5.2.15 The proposed site allocations and their distance in relation to each of the Habitats sites are given in Table 5-3.

Table 5-3 - Proximity of proposed site allocations to Habitats sites identified within the 7.2km Zol

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
1.1	Bishopsgate Goods Yard	Mixed-use, residential-led scheme (500 homes) with a mix of retail, workspace, community and cultural uses and the provision of a leisure facility and an Idea Store (c. 11,500sqm non-residential use).	CAZ	Yes (5.64 km)	No	9.2	Yes (8.3km)	No
1.2	London Dock	Mixed-use, residential-led scheme (1,800 homes) with a mix (21,500sqm) of retail, workspace, community and cultural uses and the provision of a secondary school.	Inner London	Yes (7.15 km)	No	7.2	No	N/A
1.3	Marian Place Hasworks and The Oval	Development should consist of a mixed-use, residential-led scheme (700 homes) with a mix (c.4,000sqm) of retail, workspace, community and cultural uses.	Inner London	Yes (4.35 km)	Yes (6.75 km)	7.2	Yes (6.75 km)	No
1.4	Whitechapel South	Mixed-use, residential-led scheme (837 homes, 425 student rooms) with a mix (c. 93,000sqm) of retail, workspace and community uses.	Inner London	Yes (5.97 km)	No	7.2	No	N/A
1.5	London Metropolitan University	Redevelopment of the university buildings to provide additional teaching space and student accommodation (520 student rooms and 33,500sqm of educational floorspace).	CAZ	Yes (6.47 km)	No	4.2	No	N/A
1.6	Whitechapel North	mixed-use, residential-led scheme (1,225 homes) with a mix of retail,	Inner London	Yes (5.72 km)	No	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		workspace and community uses (at least 4,500sqm).						
1.7	Brick Lane and Pedley Street	Mixed-use, residential-led scheme (800 homes) with a mix of retail, workspace and community uses (up to 35,000sqm non-residential floorspace).	Inner London	Yes (5.56 km)	No	7.2	No	N/A
2.1	Bow Common Lane	Mixed-use, residential-led scheme (1,000 homes) with a mix of retail, workspace, community and cultural uses and sixth form educational centre (2,500sqm non-residential use).	Inner London	Yes (6.1 km)	Yes (6.41 km)	7.2	Yes (6.4km)	No
2.2	Chrisp Street	Mixed-use scheme combining residential uses (650 homes) with an enhanced town centre combining retail, workspace, community and cultural uses (20,000sqm town centre and community use).	Inner London	Yes (7.16 km)	Yes (6.99 km)	5.5	No	N/A
3.1	Ailsa Street	Mixed-use, residential-led scheme (1,450 homes) with a mix of retail, workspace, community and cultural uses (6,500sqm non-residential use).	Inner London	Yes (6.85 km)	Yes (6.3 km)	5.5	No	N/A
3.2	Leven Road	Mixed-use, residential-led scheme (2,800 homes) with a mix of retail, workspace, community and cultural uses, and provision of a secondary school (8,500sqm commercial floorspace).	Inner London	Yes (7.18 km)	Yes (6.37 km)	5.5	No	N/A
3.3	Aberfeldy Estate	Mixed-use, residential-led scheme (1,550 homes) with a mix of retail,	Inner London	Yes (7.05 km)	Yes (6.51 km)	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		workspace, community and cultural uses, and provision of a primary school (3,500sqm)						
3.4	Bromley by Bow	Mixed-use, residential-led scheme (1,300 homes) with a mix of retail, workspace, community and cultural uses, and provision of a primary school, community centre (20,000sqm non-residential use), and improved connections across the River Lea	Inner London	Yes (5.68 km)	Yes (5.31 km)	5.5	No	N/A
3.5	Blackwall Trading Estate and Leamouth Road Depot	Mixed-use, residential- and light industrial-led scheme, with some potential for other commercial uses. (700 homes, 35,000sqm non-residential floorspace, 6,500sqm depot, if needed)	Inner London	No	Yes (6.48 km)	7.2	Yes (6.5km)	No
3.6	Hackney Wick Station	Mixed-use, employment-focused scheme with a mix of residential, retail, workspace, and creative and cultural uses (300 homes on TH site, 500 homes on LLDC site, 6,500sqm non-residential)	Inner London	Yes (3.83 km)	Yes (4.11 km)	7.2	Yes (4.1km)	Yes (5.5km)
3.7	Hepscott Road	Mixed-use, residential-led scheme (525 homes) with a mix of retail, workspace, and creative and cultural uses (11,000sqm commercial/community floorspace), and delivery of a linear park and crossings of the canal.	Inner London	Yes (4.1 km)	Yes (4.43 km)	7.2	Yes (4.4km)	Yes (6.0km)
3.8	Sweetwater	Mixed-use, residential-led scheme (775 homes) with a mix of retail, workspace, and community uses, and provision of a library, nursery, health care facility (4,500sqm commercial/community	Inner London	Yes (4.07 km)	Yes (4.05 km)	7.2	Yes (4.1km)	Yes (4.9km)

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		floorspace), and bridges across the canal.						
3.9	Teviot Estate	Mixed-use, residential-led scheme (1,200 homes) with a mix of retail, workspace, community and cultural uses, and provision of a primary school (5,000sqm commercial/community floorspace).	Inner London	Yes (6.63 km)	Yes (6.23 km)	5.5	No	N/A
4.1	Aspen Way	Mixed-use, residential-led scheme (1,900 homes) with a mix of retail, workspace, community and cultural uses and the reprovision of a college, community centre, football pitches, and transport depot (5,500sqm non-residential and 21,000sqm educational floorspace).	Inner London	No	No	5.5	No	N/A
4.2	Billingsgate Market	Mixed-use, residential-led scheme (1,600 homes) with a mix of retail, workspace, community and cultural uses and the provision of a secondary school and freight consolidation centre (62,000sqm educational use, 8,300sqm industrial use, 66,000sqm commercial use, and 20,000sqm retail floorspace).	Inner London	No	No	7.2	No	N/A
4.3	Crossharbour	Mixed-use, residential-led scheme (2,250 homes) with a mix of retail, workspace, community and cultural uses and the provision of a health centre, primary school and community centre (25,000sqm non-residential).	Inner London	No	No	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
4.4	Limeharbour	Mixed-use, residential-led scheme (1,850 homes) with some employment spaces (39.000sqm).	Inner London	No	No	7.2	No	N/A
4.5	Marsh Wall East	Mixed-use, residential-led scheme (2,400 homes) with some employment spaces, and provision of a primary school and a health facility (10,000sqm hotel, 3,300sqm educational use, 45,000sqm commercial, and 10,500sqm retail use).	Inner London	No	No	5.5	No	N/A
4.6	Marsh Wall West	Mixed-use, residential-led scheme with some employment spaces (2,625 homes, 1,000 student units, 800 co-living units, 1,175 hotel rooms and serviced apartments)	Inner London	No	No	3.4	No	N/A
4.7	Millharbour	Mixed-use, residential-led scheme (1,700 homes) with a mix of workspace and community uses, including provision of a primary and secondary school (6,000sqm non-residential use, 3,500sqm educational floorspace).	Inner London	No	No	5.5	No	N/A
4.8	North Quay	Mixed-use scheme with elements of residential (1,250 homes) and employment floorspace (160,000sqm).	Inner London	No	No	7.2	No	N/A
4.9	Reuters	Residential-led scheme (900 homes) with provision of a primary school (2,250sqm commercial use/public house).	Inner London	No	No	3.4	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
4.1	Riverside South	Mixed-use scheme with elements of residential (1,650 homes) and employment floorspace (56,000sqm).	Inner London	No	No	7.2	No	N/A
4.11	Westferry Printworks	Residential-led scheme with provision of a secondary school (950 homes, 14,500sqm educational use, 2,000sqm commercial use, 4,000sqm community use, 1,500sqm retail use).	Inner London	No	No	7.2	No	N/A
4.12	Wood Wharf	Mixed-use, residential-led scheme (3,600 homes) with a mix of retail, workspace, community and cultural uses and the provision of a primary school and health facility and an expansion of the Idea Store (165-265,000sqm commercial floorspace).	Inner London	No	No	7.2	No	N/A
4.13	10 Bank Street	Mixed-use, residential- and commercial-led scheme (575 homes, 41,000sqm commercial/town centre uses)	Inner London	No	No	7.2	No	N/A
4.14	Westferry and Park Place	Mixed-use, residential- and commercial-led scheme (550 homes, 19,000sqm commercial/town centre floorspace)	Inner London	No	No	7.2	No	N/A

5.3 Information relating potential effects on Habitats sites

- 5.3.1 Table 5-4 overleaf summarises pressures and threats listed on the Site Improvement Plans (SIPs) for SPAs and SACs that will need to be considered during screening and Appropriate Assessment (if required) of the Local Plan.

Table 5-4 - Pressures and threats listed on Habitats sites SIPs²¹

Impacts highlighted as red should be given primary consideration in screening and Appropriate Assessment of the Local Plan policies, and those highlighted green are less likely to be considerations in screening and Appropriate Assessment of the Local Plan (note that abbreviations are those pressures and threats listed in the Joint Nature Conservation Committee (JNCC) data sheet for the respective Habitats site).

Site Name	Air pollution: impact of atmospheric nitrogen deposition	Public access/ disturbance	Hydrological changes	Inappropriate scrub control	Inappropriate water levels	Water pollution	Inappropriate cutting/mowing	Invasive species	Changes in species distribution	Disease	Fisheries : Fish stocking	Undergrazing
Lee Valley SPA and Ramsar ²²	T	T	T	T		T	T	T			T	
Epping Forest SAC ²³	P	P			T	T		P/T	T	T		P

²¹ P = Pressure, T = Threat

²² Natural England (2014) *Site Improvement Plan: Lee Valley (SIP118)* [online]. Available from: <https://publications.naturalengland.org.uk/publication/5864999960444928>

²³ Natural England (2016) *Site Improvement Plan: Epping Forest (SIP076)* [online]. Available from: <https://publications.naturalengland.org.uk/publication/6663446854631424>

6 Approach to Stage 1 Screening

6.1 Guidance

- 6.1.1 Government guidance and Court rulings have confirmed that the level of detail in the HRA of a plan, whilst meeting the relevant requirements of the Habitats Regulations, should be appropriate to the level (or tier) of plan or project that it addresses.
- 6.1.2 The guidance referred to in Section 2.5 has been referred to in undertaking the Stage 1 screening of the LBTH Local Plan policies. The approaches set out by the guidance have been interpreted to the level of detail available within the objectives, policies and description of projects based on the descriptions contained within the Local Plan, noting that at its current stage, the Plan is a high-level document. At a greater level of detail, and as normally required with specific project level HRAs for example, the HRA stages have more specific data requirements.

6.2 Air Quality Input

- 6.2.1 The sensitivity of Habitats sites to changes in air quality is fundamental to the Stage 1 screening of the LBTH Local Plan policies. The sensitivity of the identified Habitats sites has been informed by the review of identified pressures and threats (**Table 5-4**) and a review of the Air Pollution Information Service (APIS)²⁴.
- 6.2.2 A detailed assessment of air quality / air pollution impact pathways has been provided in the associated *Air Quality Information Report to Support Habitats Regulations Assessment*, (WSP 2024) and should be read in conjunction with this report. Findings and conclusions are summarised here, where relevant.

6.3 In-Combination Assessment

- 6.3.1 It is a requirement of the Habitats Regulations to consider the effects of projects or plans “in combination” at the screening stage. Articles 24, 63 and 105 of the Habitats Regulations require Natural England and other competent authorities to consider the effects of plans or projects alone and in combination with other plans or projects. The ‘in-combination’ requirement is undertaken in order to make sure that prior to their authorisation the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.

²⁴ Air Pollution Information Service. Available at [Air Pollution Information System | Air Pollution Information System \(apis.ac.uk\)](https://apis.ac.uk)

6.3.2 The landmark Waddenzee judgment provides a clear interpretation of the legislation. Paragraphs 53 and 54 of the Judgment state:

6.3.3 *“according to the wording of that provision [Article 6(3) of the Habitats Directive] an Appropriate Assessment of the implications for the site concerned of the plan or project must precede its approval and take into account the cumulative effects which result from the combination of the plan or project with other plans or projects in view of the sites conservation objectives. Such an assessment therefore implies that all the aspects of the plan or project which can, individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field.”*

6.3.4 Table 6-1 outlines the types of plans and projects that should be considered in an in-combination assessment:

Table 6-1 - Types of plans and projects considered at “In-combination” assessment.

<ul style="list-style-type: none"> ▪ The incomplete or non-implemented parts of plans or projects that have already commenced;
<ul style="list-style-type: none"> ▪ Plans or projects given consent or given effect but not yet started;
<ul style="list-style-type: none"> ▪ Plans or projects currently subject to an application for consent or proposed to be given effect;
<ul style="list-style-type: none"> ▪ Projects that are the subject of an outstanding appeal;
<ul style="list-style-type: none"> ▪ Ongoing plans or projects that are the subject of regular review;
<ul style="list-style-type: none"> ▪ Any draft plans being prepared by any public body;
<ul style="list-style-type: none"> ▪ Any proposed plans or projects published for consultation prior to application;
<ul style="list-style-type: none"> ▪ Projects being proposed or being undertaken by a competent authority itself which require no external authorisation.

6.3.5 With reference to Section 2.3, case law and methodology relating to HRA has changed rapidly over recent years. One of the most notable changes as a result of CJEU rulings has been the clarification that mitigation measures cannot be included in HRA Stage 1 (Screening). As this was previously a common practice, many HRAs will have concluded no LSE on Habitats sites, based on the likely effectiveness of mitigation measures. The outcome of this is that preceding plan-level HRAs can be unreliable in terms of adopted conclusions of ‘no LSE’.

6.3.6 Based on this complexity and need for consistency in the assumptions relating to mitigation, a precautionary approach has been adopted when considering the HRA conclusions of overlapping plans and projects in-combination.

7 HRA Stage 1 Screening of the Local Plan Policies

- 7.1.1 The pressures and threats set out in Table 5-3 have been reviewed for those likely to arise from the policies within the Local Plan and in particular the proposed delivery of dwellings within the Borough. Those considered relevant to this type and scale of development have been identified as:
- air pollution: impact of atmospheric nitrogen deposition;
 - public access/ disturbance/ recreational pressures; and
 - hydrological changes
- 7.1.2 The pressures and threats set out in Table 5-3 which are considered at this early stage to be unlikely to arise from the policies as presented and the draft development allocations (except where this directly results secondarily from the pressures and threats included above) and are not considered further in this screening exercise, are: inappropriate water levels; inappropriate scrub control; water pollution; inappropriate cutting / mowing; invasive species; changes in species distribution; disease; fisheries: fish stocking and undergrazing.
- 7.1.3 Further information relating to those pressures and threats identified as relevant to the LBTH Local Plan and the development allocation targets are also presented below.

7.2 Potential Air Quality Effects

- 7.2.1 Consideration has been given to the potential effect of changes in air quality within the identified Habitats sites, where they fall within the specified Zol, with a particular focus on qualifying features, including:
- changes in NO_x and NH₃ concentrations in relation to the Critical Levels for these pollutants; and
 - Changes in N deposition in relation to the relevant Critical Loads.

Critical Levels for NO_x and NH₃

- 7.2.2 Critical Levels are used to estimate the exposure of sensitive vegetation and ecosystems to some important airborne pollutants, below which significant harmful effects are not expected to occur. These levels have been adopted by the European Union and the United Nations Economic Commissions for Europe (UNECE) and are used as regulatory standards and are expressed in units of µg/m³ (micrograms per cubic metre).
- 7.2.3 Critical Levels are not habitat specific, as with Critical Loads (see below), but have been set to cover broad vegetation types. For NO_x concentrations, there are Critical Levels given for both annual and 24 hour mean concentrations, irrespective of habitat type. For NH₃, there are two values relevant to annual mean concentrations, one (1 µg/m³) where lichens and bryophytes are present (and form a key part of the ecosystem integrity), which are

particularly sensitive to changes in NH₃, and another (3µg/m³ with an uncertainty range of 2 – 4µg/m³) for all remaining vegetation.

7.2.4 The relevant Critical Levels for NO_x and NH₃ relating to the protection of vegetation and ecosystems are summarised in Table 7-1.

Table 7-1 - Relevant NO_x and NH₃ Critical Levels for the Protection of Vegetation and Ecosystems

Pollutant		Concentration (µg/m ³)	Averaging Period
Nitrogen oxides (NO _x)		30	Annual Mean
		75	24-hours
Ammonia (NH ₃)	Where lichens and bryophytes are present (and form a key part of the ecosystem integrity)	1	Annual Mean
	All other vegetation	3 (with uncertainty of 2-4)	Annual Mean

CRITICAL LOADS

7.2.5 In addition to the direct effect of pollutant concentrations in the air, vegetation can also be affected by the deposition of pollutants and particles onto both the ground and vegetation. Close to roads, N deposition can be of concern for sensitive ecological sites as it can result in a variety of adverse effects depending on the habitats present (e.g. interfering with photosynthesis, increasing acidification, altering species composition etc).

7.2.6 In the UK, Critical Loads have been established for a wide range of habitat and vegetation types, reflecting the variation in ecosystem responses to N deposition. Details of the Critical Loads relevant to a specific habitat or designated site are

available from the Air Pollution Information Systems (APIS) website²⁵. In relation to Critical Loads, N Dep is expressed in units of kilograms of nitrogen per hectare per year (Kg N/ha/yr).

- 7.2.7 A summary of the relevant Critical Loads for the identified Habitats sites is provided in Appendix C for both SPAs and SACs.

BASELINE CONDITIONS AT SITES WHERE AIR POLLUTION IS IDENTIFIED AS A PRESSURE AND/OR THREAT

- 7.2.8 Lee Valley SPA & Ramsar are a Habitats site where air pollution is cited as an identified threat. While for Epping Forest, air pollution is identified to present a pressure to the Habitat site, as per **Table 5-4**.

NO_x Concentrations

- 7.2.9 Background annual mean NO_x values for Epping Forest SAC and Lee Valley SPA & Ramsar site have been taken from the national maps provided by the Department for Environment Food and Rural Affairs (Defra)²⁶, where background concentrations of NO_x have been mapped at a grid resolution of 1x1km for the whole of the UK, and are provided in Table D-1 in Appendix D.
- 7.2.10 The Critical Level is predicted to be met at background locations across the vast majority of Lee Valley SPA & Ramsar with total NO_x concentrations ranging from a minimum of 11.9µg/m³ to a maximum of 30.6µg/m³. Background NO_x concentrations are predicted to exceed the Critical Level in the 1x1km grid square covering the part of the Lee Valley SPA and Ramsar Site where it meets the heavily trafficked A503 (Forest Road).
- 7.2.11 The Critical Level is predicted to be met at background locations across the majority of Epping Forest SAC with total NO_x concentrations ranging from a minimum of 15.0µg/m³ to a maximum of 35.7µg/m³. Background concentrations are predicted to exceed the Critical Level in parts of the SAC, near the heavily trafficked A406 (North Circular Road) and the A104 and A114 (Whipps Cross Road).
- 7.2.12 It should be noted that background concentrations are representative of concentrations that can be experienced away from a pollution source. Therefore, within increasing proximity to a pollution source, such a busy road, annual mean NO_x concentrations will increase such that there could be the potential for exceedances of the Critical Level for this pollutant at locations within the Lee Valley SPA & Ramsar

²⁵ <http://www.apis.ac.uk/>

²⁶ Defra (2022) *Background Mapping data for local authorities – 2018* [online]. Available at: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>

Site and Epping Forest SAC that are near to the road edge, and the use of background annual mean NO_x concentrations in the screening process should be treated with caution.

NH₃ Concentrations

- 7.2.13 From an initial review of the data provided in Appendix C for the Lee Valley SPA & Ramsar, the relevant Critical Level for NH₃ in relation to habitats supporting *Anas clypeata*, *Anas strepera*, and *Botarus stellaris* is 3µg/m³. Baseline concentrations of annual mean NH₃ within Lee Valley SPA and Ramsar indicate that the relevant Critical Level is currently being met.
- 7.2.14 The initial review of data provided in Appendix C also indicates that baseline concentrations of annual mean NH₃ within Epping Forest SAC are above the relevant Critical Levels listed for the following habitat types:
- European Dry Heaths where both the minimum and maximum value indicate the potential for exceedances of the Critical Level of 1µg/m³; and
 - Northern Atlantic wet heaths with *Erica tetralix* where the maximum and minimum values all indicate exceedances of the Critical Level of 1µg/m³.
- 7.2.15 For Atlantic acidophilous beech forests, the relevant Critical Level for NH₃ is 1 or 3µg/m³, depending on whether lichens or bryophytes are present. The minimum and maximum baseline concentrations of annual mean NH₃ indicate that a Critical Level of 1µg/m³ is being exceeded but a Critical level of 3µg/m³ is being met. Therefore, there is a risk of exceeding the Critical Level where lichens or bryophytes are present.
- 7.2.16 The relevant Critical Level for NH₃ for both *Lucanus cervus* (Stag beetle) and *Triturus cristatus* is 3µg/m³ which is relevant to the habitat which supports these species. Baseline concentrations of annual mean NH₃ within Epping Forest SAC indicate that the relevant Critical Level for both *Lucanus cervus* and *Triturus cristatus* is currently being met.
- 7.2.17 Based on the above and with reference to LBTH Local Plan policies targeting new development which could give rise to additional traffic and/or traffic re-distribution:
- Effects on Lee Valley SPA and Ramsar from NH₃ are not anticipated due to the relevant Critical Levels for NH₃ being met within this Habitats site.
 - The potential for effects on Epping Forest SAC due to increased NH₃ as a result of the emerging LP cannot be discounted due to some identified exceedances of the Critical

Level, particularly where lichens and bryophytes may be present. This also takes into account that background concentrations of NH₃ are forecast to increase year on year²⁷.

N Deposition

7.2.18 The N Dep values presented in Appendix C indicate that:

- For Lee Valley SPA, only *Botaurus stellaris* (Bittern) has an established Critical Load for N Dep. The lower Critical Load for rich fens (the relevant habitat supporting the species) of 5 kg/N/ha/year is being exceeded across the SPA, whereas the upper Critical Load of 25 kg/N/ha/year is being met throughout the site.
- For Epping Forest SAC, both the upper and lower Critical Load values are exceeded for all habitats identified (wet heath and European dry heaths, which have a Critical Load range of 5 – 15 kg/N/ha/year, and Atlantic acidophilous beech forests, which have a Critical Load range of 10 –15 kg/N/ha/year). In addition, both the lower and upper Critical Load values for broadleaved deciduous woodland, the supporting habitat for *Lucanus cervus* (Stag beetle), are exceeded within the Epping Forest SAC.

7.2.19 This is not to say that all these areas will be significantly impacted by LBTH Local Plan but it does highlight areas that will be particularly sensitive to any changes in air quality as a result of the LBTH Local Plan.

Public Access / Disturbance

7.2.20 As part of the screening exercise, consideration has also been given to the sensitivities of the Habitats sites to public access and disturbance. Development in proximity to these sites can lead to an increase in visits to the sites, with the result that additional pressures can arise including increased incidence of fire, disturbance to roosting, feeding and breeding birds, trampling and increased predation rates in heathland environments²⁸.

7.2.21 The Habitats sites identified in this screening include those designated for habitats, specifically heathland and woodland, those designated for wetland bird species, and sites designated for invertebrate interest. The habitats or qualifying features of the Habitats sites are therefore vulnerable to additional pressures from public access or disturbance through different mechanisms.

²⁷ <https://data.jncc.gov.uk/data/04f4896c-7391-47c3-ba02-8278925a99c5/JNCC-Report-665-FINAL-WEB.pdf>

²⁸ Underhill-Day, 2005 *A literature review of urban effects on lowland heaths and their wildlife* English Nature Report 623

- 7.2.22 The location of the identified Habitats sites in South East England places them in a location of acute pressure from high population density and predicted growth, with the corresponding identified trend to visit these sites more²⁹.

Hydrological Changes

- 7.2.23 Consideration has also been given to hydrological changes in relation to Lee Valley SPA and Ramsar that may arise as a result of the new Local Plan. This is as a result of development supported by the new Local Plan likely to result in an increased demand for water which could indirectly impact upon Habitat Sites.
- 7.2.24 Lee Valley SPA and Ramsar is water resource sensitive and part of it (Walthamstow reservoirs) form part of the public water supply (PWS) system in London and therefore an increase in water demand e.g via abstraction etc. as a result of the predicted growth arising from LBTH Local Plan may result in hydrological changes to this Habitat Site.
- 7.2.25 The site features for Epping Forest are not considered to be ‘water resource sensitive’ with hydrological changes not listed as a pressure or threat for this SAC. Therefore, Epping Forest will not be vulnerable to changes in abstraction that may be associated with the growth supported by the new Local Plan. As such, Epping Forest will not be considered further within this screening exercise with regards to hydrological changes.

Consultation With Natural England

- 7.2.26 As part of the Integrated Impact Assessment (IIA) - Scoping Report for LBTH Local Plan, Natural England were consulted in May 2023. A response from Natural England received in July 2023 stated the following:

‘Natural England have no comments to make on this consultation’. ‘Once further work develops on which sites will be taken forward for allocation please consult Natural England so we can offer advice on their suitability with regard to impacts on and opportunities for the natural environment.’

- 7.2.27 It is considered that consultation will be undertaken following the submission of the HRA Screening document.

Summary of Discussion on Pressures and Threats

- 7.2.28 The screening exercise has considered the high-level pressures and threats to each site associated with public access and disturbance based on published research and

²⁹ Lake, S.; Liley, D.; Saunders, P. 2020 *Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches*. Unpublished report by Footprint Ecology

reports for individual sites and the effects of access generally on habitats and species.

Table 7-2 - Discussion of Identified Pressures and Threats

Pressure/threat	Habitats sites concerned	Discussion
<p>Air pollution: impact of atmospheric nitrogen deposition</p>	<p>Lee Valley SPA & Ramsar</p>	<p>Seventeen of the allocated sites fall within the (non-refined) 7.2km Zol of the Habitats Site. The closest site is approximately 3.8km (as the crow flies) from Lee Valley SPA & Ramsar.</p> <p>The SIP states: <i>Nitrogen deposition exceeds site relevant critical loads.</i></p> <p>Data from Defra and APIS confirms the potential for exceedances of both the Critical Level and Critical Loads for NO_x concentrations and N deposition, respectively.</p>
	<p>Epping Forest SAC</p>	<p>Twelve of the allocated sites fall within the (non-refined) 7.2km Zol of the Habitats site. Notably, the closest site is approximately 4.2km (as the crow flies) from Epping Forest SAC.</p> <p>The SIP states: <i>Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts.</i></p> <p>Data from Defra and APIS confirms the potential for exceedances of both the Critical Level and Critical Loads for NO_x concentrations and N deposition, respectively.</p> <p>Similarly, there is the potential for Critical Levels for NH₃ to be exceeded for Northern Atlantic wet heaths, European dry heaths, and Atlantic acidophilous beech forests (where lichens and bryophytes are present).</p>

Pressure/threat	Habitats sites concerned	Discussion
<p>Public access/ disturbance</p>	<p>Lee Valley SPA & Ramsar</p>	<p>There are 17 Proposed Allocations that fall within the 7.2km Zol. The closest of which is Hackey Wick Station approximately 3.83km to Lee Valley SPA and Ramsar.</p> <p>Public access and disturbance are listed as a threat on the designated site, specifically with regards to populations of Bittern, Gadwall and Shoveler. The SIP states: <i>'Areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly'</i></p> <p>The proposed measures in the SIP to address this is:</p> <ul style="list-style-type: none"> - <i>Investigate whether there is a need for change to access management; and</i> - <i>Agree appropriate management measures with stakeholders to align with best practice.</i>
	<p>Epping Forest SAC</p>	<p>Natural England has issued Overarching Standard Advice for Development Applications within Epping Forest District³⁰.</p> <p>The guidance sets out the following with regards to recreational disturbance: <i>As part of the work required to produce a mitigation strategy for recreational pressure, Footprint Ecology have undertaken visitor surveys to identify a recreational Zol and to identify the distance the majority of visitors will travel to visit Epping Forest SAC. The 2017 report</i></p>

³⁰ [Overarching standard advice for development applications within Epping Forest District \(eppingforestdc.gov.uk\)](http://eppingforestdc.gov.uk)

Pressure/threat	Habitats sites concerned	Discussion
		<p><i>identified that 75% of visitors travelled up to 6.2Km to the SAC and this distance has been used in the interim period as the Zol. Following further survey work carried out in Autumn 2019 Natural England advised that it was appropriate to continue using the distance of 6.2km provided that the intention was to carry out further survey work in June 2021.</i></p> <p><i>It is Natural England’s understanding that no further survey work has been undertaken. It is also unclear, if it were to be undertaken, how representative data collected would be given the impact of the coronavirus (COVID-19) on national/international travel and recreational habits. We therefore advise that, in the absence of further evidence, it remains appropriate to continue to use 6.2km as the Zol for Epping Forest SAC at this time, although support the view that further summer surveys should be undertaken as soon as is reasonably practicable. Larger developments on the periphery of this 6.2km zone will need to consider the implications of the best and most recent available evidence, the need for further survey data and any potential recreational impacts in their HRAs.</i></p> <p>However, in relation to the above, it should be noted that this advice is in relation to Epping Forest District which is considered to fall within Outer London, whilst Tower Hamlets is considered to be Inner London, and as such, the distance travelled is likely to vary, with shorter trip lengths for Inner London boroughs.</p> <p>Twelve Proposed Allocations fall within the 7.2km Zol, with Sweetwater the closest Proposed Allocation, located approximately 4.07km away.</p>

Pressure/threat	Habitats sites concerned	Discussion
		<p>Public access and disturbance are listed as both pressures and threats on the designated site and specifically the following habitat features: H4010 Wet heathland with cross-leaved heath, H4030 European dry heaths, H9120 Beech forests on acid soils. The SIP states:</p> <p><i>‘Epping Forest is subject to high recreational pressure. There is a high general level of footfall in Epping Forest throughout the year, including periods of significant use, and resulting in a diverse range of impacts which include mountain biking and unmanaged fires. Population and visitor numbers are likely to continue to increase.’</i></p> <p>The proposed measures in the SIP to address this is:</p> <ul style="list-style-type: none"> - Identify key areas that are subject to recreational impacts; and - Agree and implement a site-specific recreational management plan to ensure SAC features are protected and maintained.
<p>Hydrological changes</p>	<p>Lee Valley SPA & Ramsar</p>	<p>As a result of the predicted growth in LBTH resulting from the Local Plan, there is the risk of hydrological changes to Lee Valley SPA and Ramsar.</p> <p>Hydrological changes are listed as a threat on the designated site, specifically with regards to populations of bittern, gadwall and shoveler. The SIP states:</p> <p><i>‘Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.’</i></p> <p>The proposed measures in the SIP to address this is:</p>

Pressure/threat	Habitats sites concerned	Discussion
		<ul style="list-style-type: none"> - <i>Define more clearly the water level requirements for the habitats supporting the SPA bird features; and</i> - <i>As a follow up to the above, agree the necessary water level management with key stakeholders for significant water bodies.'</i>

7.2.29 Table 7-3 sets out the findings of the Stage 1 Screening exercise and identifies where the potential for LSE arises.

Table 7-3 - Screening

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
Delivering on the Local Plan						
DV1	<i>Areas of growth and opportunity within Tower Hamlets</i>	This policy sets out the spatial strategy for growth and development within the borough for the life of the plan and sets out the proposed site allocations and growth areas.	All Habitats Sites	This policy is to ensure the local plan policies are effective by following a framework that has been prepared to set out the key performance indicators that will help track the delivery and performance of the Local Plan.	No LSE therefore no in-combination effect.	Screened out
DV2	<i>Delivering sustainable growth in Tower Hamlets</i>	This policy seeks to ensure development is sustainable and accessible, creates healthy environments, promotes environmental improvements and contributes towards a cleaner and greener future (i.e. through zero carbon developments, circular economy principles, low carbon energy, sustainable travel, mitigating impacts of poor air quality).	All Habitats Sites	This is a positive policy that seeks to promote sustainable development. It is compatible with the aims of conserving the integrity of Habitats sites by helping to ensure the delivery of sustainable development.	No LSE therefore no in-combination effect.	Screened out
DV3	<i>Healthy communities</i>	This policy sets out a requirement for development to contribute to a healthy built environment and promote active travel to encourage positive health and well-being. It also requires major development to complete	All Habitats Sites	A positive policy that seeks to improve human health benefits within the borough as a result of development.	No LSE therefore no in-combination effect.	Screened out

³¹ Where there is an identified pressure or threat.

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		Health Impact Assessments as part of planning applications.				
DV4	<i>Planning and construction of new development</i>	This policy aims to minimise the impact of development on the local environment and existing communities. It sets out requirements for developers to employ sustainable construction methods and for major development to sign up to the Code of Construction Practice and proposed measures to mitigate potential impacts.	All Habitats Sites	This is a broad policy that relates to development within LBTH. Whilst it is noted that development has potential to impact upon Habitats sites (atmospheric pollution, increased visitor pressures and water resource conflicts), this policy does not explicitly provide for development, but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out
DV5	<i>Developer contributions</i>	This policy establishes the requirements for financial contributions from developers to fund improvements to infrastructure and the environment.	All Habitats Sites	This policy is associated with securing developer contributions on infrastructure delivery within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
DV6	<i>Social value</i>	This policy sets out the council's intentions to maximise delivery of social value through development. Requires major development to submit a social value strategy.	All Habitats Sites	A positive policy that seeks to promote economic wellbeing, improve social progress and protect and enhance the natural and built environment in the borough as a result of development.	No LSE therefore no in-combination effect.	Screened out
DV7	<i>Utilities and digital connectivity</i>	The policy aims to ensure development is supported by appropriate utilities and has access clean heat and energy and quality internet/mobile connectivity.	All Habitats Sites	This policy relates to provision of utilities and broadband access. No effect pathways.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
DV8	<i>Site allocations</i>	This policy sets out some requirements for all proposed site allocations (as included in section 4 of the Local Plan), including delivering required infrastructure, provision of publicly accessible open space, social infrastructure, buffer spaces for watercourse etc.	All Habitats Sites	This policy sets out the specific development requirements for the proposed site allocations rather than its locational distribution. It does contain measures that could be positive for Habitats sites such as public open space provision and CIL.	No LSE therefore no in-combination effect.	Screened out
Homes for our Community						
HF1	<i>Meeting housing needs</i>	This policy sets out the strategic housing targets to ensure Tower Hamlets housing need are met. Policy supports new housing on windfalls sites.	All Habitats Sites	<p>The quantum of development across the Borough where known, is set out in the Proposed Allocations and Reasonable Alternatives identified, the closest of which 3.78km from the nearest screened in Habitats site (Figure 1).</p> <p>Any development within LBTH's administrative area that falls within the indicative 7.2km ZOI has the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites, and hydrological changes via increased abstraction (Lee Valley SPA and Ramsar only). This policy could result in development in proximity to Habitats sites which could lead to LSE.</p>	<p>Any increase in traffic due to development has the potential to give rise to 'in-combination' effects with other plans and projects.</p> <p>Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes, and increased abstraction may result in hydrological changes.</p>	Screened in

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
HF2	<i>Affordable housing and housing mix</i>	This policy establishes a target of 50% of new homes to be affordable.	All Habitats Sites	This is a development management policy and a framework to guide the affordable housing requirement in LBTH. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF3	<i>Protection of existing housing</i>	This policy aims to protect existing housing and to safeguard supply of self-contained homes.	All Habitats Sites	This is a development management policy and a framework to guide the protection of existing housing in LBTH. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF4	<i>Supported and specialist housing</i>	This policy seeks to ensure adequate supply of specialist housing.	All Habitats Sites	This is a development management policy to guide LBTH when providing for specialist and supported living housing as well as housing for older people. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF5	<i>Gypsy and traveller accommodation</i>	The policy provides a site for Gypsy and Traveller accommodation and establishes criteria that allows for the consideration of additional accommodation should a need be identified.	All Habitats Sites	This is a development management policy to guide LBTH when providing for Gypsy and Traveller needs. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF6	<i>Purpose-built student accommodation</i>	This policy sets out strict criteria to manage purpose-built student accommodation, so as not to compromise the ability to meet other needs. It	All Habitats Sites	This is a development management policy to guide LBTH on the student accommodation needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		requires 50% to be affordable accommodation.				
HF7	<i>Large-scale purpose-built shared living</i>	This policy set out criteria for purpose built shared accommodation and a target for 50% to be affordable.	All Habitats Sites	This is a development management policy to guide LBTH on the shared living housing needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF8	<i>Housing with shared facilities (houses in multiple occupation)</i>	This policy sets out criteria for houses with multiple occupations and aims to ensure they contribute to maintaining mixed and inclusive communities.	All Habitats Sites	This is a development management policy to guide LBTH on the shared living housing needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF9	<i>Housing standards and quality</i>	This policy aims to ensure housing meets the appropriate design, space, and amenity standards.	All Habitats Sites	This is a development management policy to guide LBTH on ensuring the housing standards and quality are met. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Clean and Green Future						
CG1	<i>Mitigating and adapting to a changing climate</i>	This policy supports the Council's commitment to becoming net zero carbon by 2045 and sets out expectations for developments to help reduce the impacts of climate change, for example by reducing carbon emissions, mitigating against flooding and overheating, mitigating and improving air quality.	All Habitats Sites	A positive policy addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a low and net zero carbon future. Policy also looks to reduce exposure to poor air quality and contribute towards the measures outlined within Tower Hamlets Air Quality Action Plan. Therefore, policy likely to be of benefit to the Habitats sites if this includes the provision of more sustainable transport	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
				methods by reducing the need for private car use.		
CG2	<i>Low energy buildings</i>	The policy aims to ensure development within Tower Hamlets are designed and constructed to be Net Zero Carbon in operation and heat/energy efficient.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development.	No LSE therefore no in-combination effect.	Screened out
CG3	<i>Low carbon energy and heating</i>	The policy requires development to use low carbon heating and clean energy supply.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development and reliance of fossil fuels as a heat source.	No LSE therefore no in-combination effect.	Screened out
CG4	<i>Embodied carbon, retrofit and the circular economy</i>	The policy establishes that development must consider Embodied Carbon across its lifetime and utilise Modern Methods of Construction. Retrofit and refurbishment is prioritised over demolition and new construction.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development.	No LSE therefore no in-combination effect.	Screened out
CG5	<i>Overheating</i>	The policy requires development to ensure they are designed to avoid overheating and excessive heat generation.	All Habitats Sites	This is a positive policy by helping to reduce overheating, therefore helping to address the climate emergency.	No LSE therefore no in-combination effect.	Screened out
CG6	<i>Managing flood risk</i>	The policy sets design requirements and criteria to ensure development does not increase flooding and itself is resilient to flooding.	All Habitats Sites	This is a positive policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out
CG7	<i>Sustainable drainage</i>	The policy ensures development to manage its effects on the water environment and reduce	All Habitats Sites	This is a positive policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		the risk of surface water flooding.				
CG8	<i>Water efficient design</i>	This policy aims to reduce pressure on fresh water and waste water systems.	All Habitats Sites	This is a positive policy that seeks to reduce water usage in the Borough.	No LSE therefore no in-combination effect.	Screened out
CG9	<i>Air quality</i>	This policy requires all development to mitigate against poor air quality and contribute to improvements in air quality within Tower Hamlets. Development should be at least air quality neutral, with major proposals and those within Focus Areas should be air quality positive.	All Habitats Sites	This is a positive policy that is to drive significantly improved environmental conditions with regards to air quality in the LBTH area.	No LSE therefore no in-combination effect.	Screened out
CG10	<i>Noise and vibration</i>	Policy sets design requirements for development to manage noise and vibration from proposed development and existing sources.	All Habitats Sites	This is a positive policy that seeks to reduce noise and vibration as a result of new development in the Borough.	No LSE therefore no in-combination effect.	Screened out
CG11	<i>Contaminated land</i>	The policy seeks to protect the health of Towers Hamlets residents and the environment from the impacts of past and present land uses.	All Habitats Sites	This is a positive policy that will help to protect waterbodies within the Borough from contamination.	No LSE therefore no in-combination effect.	Screened out
<i>People, Places and Spaces</i>						
PS1	<i>Design-and infrastructure-led approach to development</i>	This policy aims to ensure that new development is well-designed and proposes sustainable capacities and densities. It incorporates the requirements of the new London Plan for all sites to	All Habitats Sites	This policy provides positive provision and is a key aspect of sustainable development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		optimise their capacity through a design-led process.				
PS2	<i>Tall buildings</i>	This policy seeks to guide and manage the location, scale and development of tall buildings in the Borough in line with the London Local Plan.	All Habitats Sites	This is a development management policy relating to tall buildings which protects local views and landmarks. No effect pathways are identified as present due to no sites designated for birds or similarly-sensitive qualifying features being present within the Borough boundary or immediate surrounds	No LSE therefore no in-combination effect.	Screened out
PS3	<i>Securing design quality</i>	The policy sets out the general design criteria for new developments to be assessed against. It outlines the key elements of high-quality design so that new development creates buildings, spaces and places that are sustainable, accessible attractive, durable, and well-integrated into their surroundings and responsive to the character of the area, thus contributing to a better quality of life.	All Habitats Sites	This policy provides positive provision and is a key aspect of sustainable development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS4	<i>Attractive streets, spaces and public realm</i>	This policy aims to deliver an attractive, accessible and well-designed network of streets and spaces which promote social interaction and inclusion, which people of all ages and abilities can value and enjoy, and where they feel safe and comfortable.	All Habitats Sites	This is a positive policy that seeks to promote the use of amenity and public realm spaces within the Borough, therefore potentially diverting pressure away from the Habitats Sites.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
PS5	<i>Creating inclusive places</i>	This policy encourages all new development to consider inclusive design as part of the developmental process.	All Habitats Sites	A development management policy relating to consideration for gender inclusive design within the borough.	No LSE therefore no in-combination effect.	Screened out
PS6	<i>Heritage and the historic environment</i>	This policy aims to protect the borough's heritage and character, and sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic to ensure that its distinctive character is maintained.	All Habitats Sites	A development management policy relating to conserving Heritage assets. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
PS7	<i>World heritage sites</i>	This policy aims to protect the borough's heritage and character, and sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic to ensure that its distinctive character is maintained.	All Habitats Sites	A development management policy relating to conserving World Heritage sites. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
PS8	<i>Shaping and managing views</i>	This policy aims to ensure that important views within, into, and across the borough are preserved through appropriate management of development.	All Habitats Sites	This policy is in relation to protecting designated views. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS9	<i>Shopfronts</i>	This policy seeks to ensure that shopfronts are attractive, well designed	All Habitats Sites	This policy provides the principles for the aesthetics associated with retail	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		and make a positive contribution to the surrounding streets, spaces and public realm and thereby enhance the overall character and appearance of the borough.		development within town centres. No effect pathways present.		
PS10	<i>Advertisements, hoardings and signage</i>	This policy aims to ensure advertisements, hoardings and signage positively activate the streetscape and enhance the visual appearance of their host buildings or structures.	All Habitats Sites	This policy provides the principles for the aesthetics associated with advertising within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS11	<i>Siting and design of telecommunications infrastructure</i>	This policy aims to ensure that the design and location of telecommunications equipment does not create a safety hazard or detract from the character of their surroundings, taking into consideration the potential impacts on the amenity of the area and local residents.	All Habitats Sites	A development management policy relating to consideration for the positioning of telecommunications equipment within the borough.	No LSE therefore no in-combination effect.	Screened out
<i>Employments and economic growth</i>						
EG1	<i>Creating investment and jobs</i>	This policy sets out the approach to employment provision in relation to the level and distribution of jobs across the borough over the period to 2038 ensuring successful and sustainable local and sub-regional economies whilst promoting and facilitating a range of employment spaces.	All Habitats Sites	This is a broad policy that relates to LBTH's economy. Whilst it is noted that economic growth has potential to impact upon Habitats sites (atmospheric pollution and water resource conflicts), this policy does not explicitly provide for development, but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
EG2	<i>New employment space</i>	This policy supports Development proposals for new or intensified employment floorspace within designated employment locations / identified site allocations and at other locations where viability is demonstrated.	All Habitats Sites	<p>This policy provides the development principles for new employment floorspace within identified site allocations or designated employment locations.</p> <p>Any development within LBTH's administrative area that falls within the indicative 7.2km ZOI has the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites, and hydrological changes via water resource conflicts (Lee Valley SPA and Ramsar only).</p>	<p>Any increase in traffic due to development has the potential to result in LSE due to changes in air quality, both due to the LBTH Local Plan 'alone' and 'in-combination' with other plans and projects.</p> <p>Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes, and water resource conflicts may result in hydrological changes.</p>	Screened in
EG3	<i>Affordable workspace</i>	LBTH's Employment Land Review (2023) and Affordable Workspace Study (2023) identify a gap in the affordability of commercial space within the borough for many types of businesses. This policy supports the provision for affordable workspace within the borough.	All Habitats Sites	A development management policy relating to ensuring that new development of commercial space provides a proportion of affordable workspace.	No LSE therefore no in-combination effect.	Screened out
EG4	<i>Loss and redevelopment of employment space</i>	This policy describes the criteria that will be used to assess the potential loss of employment space within the borough in line with the vision and objectives of the plan. To ensure the supply of employment land to meet identified demand is maintained, proposals	All Habitats Sites	A development management policy relating to protecting the loss of employment space within the Borough.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		which result in the loss of employment floorspace in certain areas will not be supported.				
EG5	<i>Railway Arches</i>	This policy supports development proposals involving railway arches, subject to a set criteria, to preserve industrial spaces outside of the SIL and LSIS designations.	All Habitats Sites	A development management policy relating to development within railway arches.	No LSE therefore no in-combination effect.	Screened out
EG6	<i>Data centres</i>	This policy sets out requirements to support development of data centres in Local Industrial Locations and Local Mixed Employment Locations.	All Habitats Sites	A development management policy relating to location and form of data centres in local industrial locations and employment locations. It does not specify quantum of development.	No LSE therefore no in-combination effect.	Screened out
Town Centres						
TC1	<i>Supporting the network and hierarchy of centres</i>	This policy defines the network of centres across the borough and describes the role and function of each centre and how they will continue to serve the needs of the borough and the wider area.	All Habitats Sites	This policy sets out the principles of development within town centre locations. It does not identify any specific location or quantum of development. It can be considered that at the Local Plan level there are no effect pathways present	No LSE therefore no in-combination effect.	Screened out
TC2	<i>Protecting the diversity, vitality and viability of town centres</i>	This policy is in relation to development proposals which are expected to support the retail function of Primary and Secondary Shopping Frontages and the Redchurch Street and Columbia Road Specialist Centres, prioritising Class	All Habitats Sites	This policy seeks to protect the retail function of town centres. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		E(a) retail uses in these locations.				
TC3	<i>Town centre uses outside our town centres</i>	New retail development will be directed towards existing centres in accordance with the sequential approach set out in the NPPF which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, this policy recognises that demand for retail also exists in locations outside of Metropolitan, District and Neighbourhood Centres to meet the immediate convenience needs of local people and/or support the function of designated employment locations.	All Habitats Sites	Isolated retail units, e.g. convenience stores, are unlikely to impact on Habitats sites and will largely be within already built up areas. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC4	<i>Markets</i>	This policy advises that development proposals must support the protection, retention and enhancement of existing markets.	All Habitats Sites	This policy seeks to protect existing markets within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC5	<i>Food and drink</i>	This policy recognises that food and drink businesses play an important role in town centres and therefore development proposals relating to food and drink establishments will be supported subject to a set criteria.	All Habitats Sites	This policy seeks to support food and drink establishments within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
TC6	<i>Entertainment uses</i>	This policy recognises that concentrations of betting shops, casinos and other gambling establishments present a high level of risk to those with gambling addictions or those susceptible to addiction and therefore development proposals will be subject to strict criteria.	All Habitats Sites	This is a policy to prevent too many betting offices within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC7	<i>Evening and night-time activities</i>	This policy recognises that evening and night-time food, drink, leisure and culture businesses and organisations are an important part of the Tower Hamlets economy and contribute to the vitality, vibrancy and sense of place of town centres and as such relevant proposals will be supported subject to set criteria.	All Habitats Sites	This policy seeks to support the evening and night time economy within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC8	<i>Short-stay accommodation</i>	This policy seeks to steer visitor accommodation towards the Central Activities Zone, Canary Wharf Metropolitan Centre, Tower Hamlets Activity Areas, and the borough's District Centres, or in other locations with very good public transport accessibility.	All Habitats Sites	This policy provides the principles for development for visitor accommodation e.g. hotels within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Community Infrastructure						
CI1	<i>Supporting community facilities</i>	This policy seeks to maintain an adequate supply and range of				

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		community facilities across the borough to serve local needs and support the creation of more liveable and sustainable places.				
C12	<i>Existing community facilities</i>	This policy seeks to protect and enhance the borough's existing community facilities where they are still needed to adequately meet local needs.	All Habitats Sites	A development management policy in relation to the availability of community facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
C13	<i>New and enhanced community facilities</i>	This policy seeks to ensure that appropriate high quality community facilities are provided in accessible locations throughout the borough, particularly via methods of active travel and public transport, to adequately support the growing population and meet identified needs.	All Habitats Sites	A development management policy in relation to the availability of community facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
C14	<i>Public houses</i>	This policy seeks to protect existing public houses within the borough with development proposals not supported for the loss of a public house unless strict criteria are met.	All Habitats Sites	A positive policy seeking to promote the use of active travel and public transport within the borough in relation to accessing community facilities which will therefore potentially divert pressure away from the Habitats Sites.	No LSE therefore no in-combination effect.	Screened out
C15	<i>Arts and Culture facilities</i>	This policy seeks to protect existing arts and cultural facilities. Development proposals which include the loss of an arts or cultural facility will not be supported unless subject to meeting strict criteria.	All Habitats Sites	A policy in relation to existing public houses. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
C12	<i>Arts and Culture facilities</i>	This policy seeks to protect existing arts and cultural facilities. Development proposals which include the loss of an arts or cultural facility will not be supported unless subject to meeting strict criteria.	All Habitats Sites	A development management policy in relation to the availability of arts and cultural facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Biodiversity and open space						
BO1	<i>Green and blue infrastructure</i>	This policy seeks to protect and enhance the borough's valuable network of open spaces as well as promote the creation of new publicly accessible open spaces which are better connected and provide a wide range of opportunities for local communities and visitors in line with the Open Space Strategy, Green Grid Strategy and other relevant strategies.	All Habitats Sites	A positive policy providing for the protection and creation of Local Green and Blue infrastructure. This policy has the potential to divert recreational pressure away from sensitive Habitats sites.	No LSE therefore no in-combination effect.	Screened out
BO2	<i>Open spaces and the Green Grid network</i>	This policy aims to ensure that development proposals do not negatively impact the existing network of publicly accessible open space and contributes to its expansion and enhancement. It also seeks to maximise the opportunities for delivery of new open space and for enhancing accessibility and connectivity to the wider network, which is considered crucial to addressing the borough's open space deficiency	All Habitats Sites	This policy promotes the use and access to open spaces within the Borough which could therefore lead to increased recreational and pressures and therefore disturbance on nearby Habitats sites. The policy approach to look at this strategically could have potential to be beneficial as access can be managed, monitored and mitigated as necessary, depending on how the policy is implemented. This policy	By improving access to open spaces it has the potential to give rise to 'in-combination' effects with other plans and projects.	Screened in

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
				could result in LSE on nearby Habitats sites.		
BO3	<i>Water spaces</i>	This policy provides details of how the borough's water spaces will be protected and how the various functions they offer are maintained and enhanced.	All Habitats Sites	A positive policy providing for the protection of water spaces within the borough.	No LSE therefore no in-combination effect.	Screened out
BO4	<i>Biodiversity and access to nature</i>	This policy promotes the need for development proposals to protect and enhance biodiversity and contribute to nature recovery in the borough via a range of different means including: Protecting and retaining existing habitats and features of biodiversity value, delivering a biodiversity net gain, avoiding negative impacts on any designated European site and avoiding harm to biodiversity including within SINC sites and Local Nature Reserves.	All Habitats Sites	This is a positive policy that seeks to protect nature conservation sites including Habitats sites and embeds Biodiversity Net Gain within Planning Policy.	No LSE therefore no in-combination effect.	Screened out
BO5	<i>Urban greening</i>	LBTH will expect development proposals to maximise opportunities for urban greening. This includes the integration of high quality and species diverse landscaping, street trees, wildlife habitat, green roofs and walls, and Sustainable Drainage Systems.	All Habitats Sites	A positive policy that seeks the inclusion of urban greening measures. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
BO6	<i>Play and recreation spaces</i>	Development proposals must provide or help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation and play.	All Habitats Sites	Whilst this policy seeks to increase opportunities for play and informal recreation, it is considered to be targeted towards facilities with the community and therefore unlikely to increase in recreational pressures on nearby Habitats Sites, particularly as these all fall outside of the Borough and therefore no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
BO7	<i>Food growing</i>	LBTH will seek to protect existing allotments and community gardens and maximise the provision of new food growing spaces to support sustainable food growing locally, and to enhance opportunities for leisure, social interaction, improved physical and mental health, and education	All Habitats Sites	A positive policy seeking to utilise land within the Borough for food growing and not development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
<i>Movement and Connectivity</i>						
MC1	<i>Sustainable travel</i>	<p>This policy promotes the development of a healthy, safe, and environmentally friendly transport system that is, inclusive, accessible, and affordable for all who live, work, study in, and visit the borough.</p> <p>This policy seeks to manage growth to ensure it does not increase traffic congestion and crowding on public transport due to trip generation from development proposals as well as through-trips.</p>	All Habitats Sites	This is a positive policy to drive significantly improved environmental conditions in the LBTH area, including air quality. This improvement in environmental quality is driven primarily by human health considerations, however, an overall reduction in car trips and improvement in air quality will likely have a positive impact on levels of atmospheric pollution at Habitats sites.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
MC2	<i>Active travel and healthy streets</i>	This policy requires development proposals to improve the quality and connectivity of walking, wheeling, and cycling routes in the area. Development proposals are required to demonstrate how they have applied the Healthy Streets Approach as set out in the London Plan (2021) as part of the transport assessment.	All Habitats Sites	This is a positive policy to drive significantly improved environmental conditions in the LBTH area, including air quality. This improvement in environmental quality is driven primarily by human health considerations, however, an improvement in air quality through reductions in NOx concentrations will have a positive impact on levels of atmospheric pollution at Habitats sites.	No LSE therefore no in-combination effect.	Screened out
MC3	<i>Impacts on the transport network</i>	This policy seeks to ensure that the impact that development proposals have (both individually and cumulatively) on the transport network is fully assessed at the project level, particularly issues of congestion, air quality, severance, safety, and accessibility for cyclists and pedestrians.	All Habitats Sites	This is a positive policy that promotes the use of public and active transport modes and detailed project-level assessments for departure from these. Such activities potentially can lead to air quality improvements through reduced reliance on private motor vehicles. Elements of the policy only relate to potential negative effect pathways in describing further assessment requirements and the policy does not promote or assess these at a plan level.	No LSE therefore no in-combination effect.	Screened out
MC4	<i>Parking and permit-free</i>	This policy seeks to ensure that parking is controlled and managed both on-street and off-street to facilitate sustainable travel patterns, address congestion, and ensure that car use in the borough does not significantly increase along with the expected growth in population.	All Habitats Sites	This is a positive policy that promotes the use of public and active transport modes. Such activities potentially can lead to air quality improvements through reduced reliance on private motor vehicles and vehicles emitting greenhouse gasses.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		Sets out an expectation that car-free should be the starting point for all development.				
MC5	<i>Sustainable delivery, servicing and construction</i>	This policy seeks to address the challenges the borough faces in ensuring the efficient, safe, timely and sustainable movement of goods and materials across the borough, while also seeking to improve air quality and reduce impacts arising from the freight networks. Requires new development to use zero emission vehicles for servicing.	All Habitats Sites	This is a positive policy that promotes the use of sustainable and active transport modes. Such activities potentially can lead to air quality improvements through reduced reliance on vehicles emitting greenhouse gasses.	No LSE therefore no in-combination effect.	Screened out
Reuse, Recycling and Waste						
RW1	<i>Managing our waste</i>	This policy seeks to develop a well-planned and integrated network of waste management facilities across the borough to address future capacity needs and contribute towards managing waste generated within the borough over the plan period.	All Habitats Sites	This is a positive policy as it aims to make waste collection more efficient across the Borough.	No LSE therefore no in-combination effect.	Screened out
RW2	<i>New and enhanced waste facilities</i>	This policy relates to new and enhanced waste management facilities (including those replacing, expanding, or intensifying existing sites as well as capacity on sites) and seeks to direct them towards the most	All Habitats Sites	This is a positive policy as it aims to make waste collection more efficient across the Borough.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		appropriate and sustainable locations which do not have any unacceptable environmental and transport impacts. Requires infrastructure to facilitate transition of fleet to low and zero emission vehicles.				
RW3	<i>Waste collection facilities in new development</i>	This policy will help to ensure that waste is collected and managed in a sustainable manner. It is also intended to increase the amount of waste which can be recycled and composted from all developments, and to improve waste collection systems in developments with communal waste facilities.	All Habitats Sites	This is a positive policy as it aims to make recycling as easy as possible therefore resulting in higher recycling rates within the Borough.	No LSE therefore no in-combination effect.	Screened out

- 7.2.30 Most of the policies in the LBTH Local Plan can be concluded not to pose a risk of LSE following the screening exercise. These policies inherently present no pathway of effects and generally set out general development or planning protection principles, largely without specifying a quantum of growth or development schemes.
- 7.2.31 Three policies; HF1 – Meeting housing needs, EG2 – New employment space and BO2 – Open spaces and the Green Grid networks are screened in and as such require further consideration in this HRA at Stage 2 Appropriate Assessment. In the case of Policies HF1 and EG2 they have the potential for increased traffic (and therefore impacts on air quality), as well as the potential for increased demand on water resources (and therefore resulting in hydrological changes to Lee Valley SPA and Ramsar), and for all policies (HF1, EG2 and B02) they may result in increased recreational and development pressures and therefore disturbance on nearby Habitats sites.

8 Detailed Screening Discussion

8.1.1 The results of the Screened in LSE are outlined below. The discussion is presented by designated site and LSE.

8.2 Epping Forest SAC

Air Quality

8.2.1 This section considers the potential adverse effects on integrity of Epping Forest SAC from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.2.2 Detailed assessment is provided within the supporting *Air Quality Information Report to Support Habitats Regulations Assessment* (WSP, 2024).

8.2.3 For each of the site allocations, the proposed land use has been applied as set out in Table 5-3 'applicable/refined AQ Zol' column, which has been used to determine the average trip length/refined Zol (based on the average journey lengths provided within the Air Quality Neutral Guidance). These distances have then been applied both 'as the crow flies' and via road (which represents a more realistic scenario) to determine which site allocations lie within the refined ZOI, and therefore require further consideration, and those that lie outside of the refined ZOI and can be screened out.

8.2.4 As a result, the majority of site allocations can be screened out of further assessment because there is no identified receptor pathway. This is due to these site allocations sitting outside of the Zol (based on the proposed land uses) both 'as the crow flies' (and therefore via road, as this distance would inevitably be greater).

8.2.5 The following site allocations have been identified as being within the relevant refined Zol where there is a potential receptor pathway (adopting a precautionary approach using the highest average trip lengths for the different types of development proposed):

- 3.6 – Hackney Wick Station
- 3.7 – Hepscoth Road
- 3.8 – Sweetwater

These three allocations have therefore been taken forward for further assessment at Appropriate Assessment (and calculation of trip rates and assignment across the network, as appropriate).

8.2.6 It should be noted that the screening does not allow for windfall sites (unallocated or undesignated) which could deliver an estimated 2,500 homes over the Local Plan period. These have been automatically screened in, applying the precautionary principal. However, it is likely that a proportion of these would be located on previously development / brownfields sites outside of the identified Zol.

Conclusions

8.2.7 Likely Significant Effects cannot be ruled out for Epping Forest SAC as a result of air quality (air pollution) led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

Recreational pressure due to public access / disturbance

8.2.8 This section considers the potential adverse effects on integrity of Epping Forest SAC from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development in the Borough.

8.2.9 The basis of this assessment lies with the precautionary approach taken for maximum trip distance within an Inner London location of 7.2km for residents within the Borough and the propensity to use Habitats sites as a recreational resource given the geographical location of the allocated sites noted in the emerging Local Plan.

8.2.10 The closest Proposed Allocation to Epping Forest SAC is Sweetwater, Site ID 3.8 (4.9km north-west from Epping Forest SAC at its closest point by access). A further of 12 Allocations fall within the precautionary 7.2km Zol.

8.2.11 All other Proposed Allocations fall outside of this Zol and therefore increased recreational pressure on the SAC as a result of these allocations can be scoped out of further assessment and not considered further within this screening exercise.

8.2.12 The 7.2km average trip distance from allocations has been used as a precautionary figure to screen the likelihood of new residents visiting any individual Habitats site. When considering other distance criteria to use, a review of available visitor surveys and Habitats sites within and in proximity to London demonstrates that visitor pressure is most likely to arise from a smaller catchment area that the 7.2km applied at initial screening stage to ensure all potential Habitats sites are considered for inclusion within the assessment.

8.2.13 Visitor studies undertaken for Epping Forest have identified a 6.2km ‘zone of influence’ for the site, within which new housing development is assumed likely to have a significant effect in combination. This area forms the basis of the Epping Forest Strategic Access Management and Monitoring Strategy (SAMM) that is relied on by councils local to the SAC as mitigation for the potential effects of housing growth in their administrative areas.

8.2.14 Four allocation sites are present within this refined 6.2km zone assuming ‘as the crow flies’ straight-line distance only. These are:

- 3.6 - Hackney Wick Station
- 3.7 - Hepscott Road
- 3.8 - Sweetwater
- 3.4 - Bromley by Bow

8.2.15 These allocations have therefore been screened in for further consideration at Appropriate Assessment.

Assessment of potential effects

8.2.16 The SIP for Epping Forest SAC identifies that Epping Forest is subject to high recreational pressure with a high general level of footfall in Epping Forest throughout the year, including periods of significant use, and resulting in a diverse range of impacts which include mountain biking and unmanaged fires. It is anticipated that population and visitor numbers are likely to continue to increase. Increased recreational pressure as a result of additional housing and new employment space within the Borough as set out under Policy HF1 and EG2 of the Local Plan is considered to be a risk to this Habitats Site.

Conclusions

8.2.17 Likely Significant Effects cannot be ruled out for Epping Forest SAC as a result of increased recreational pressure led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

8.3 Lee Valley SPA and Ramsar

Air Quality

8.3.1 This section considers the potential adverse effects on integrity of Lee Valley SPA & Ramsar Site from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.3.2 The SIP for Lee Valley is the source of screening assessment set out in Table 7-2, as *Air Pollution: risk of atmospheric nitrogen deposition* is listed in that document as a ‘Threat’, but specifically only in association with the qualifying feature A021(NB) Bittern (*Botaurus stellaris*) and an associated action on Natural England to ‘Investigate the potential impacts of air pollution’.

8.3.3 Lee Valley SPA is a large and fragmented Habitats site, with distinct and separate component areas of waterbodies extending from Ware in the north, approximately 26km south to Clapton. In considering the unique underpinning SSSIs, not all of these sites are designated for Bittern and those locations close to the Local Plan ZOI (Walthamstow Reservoirs, Walthamstow Marshes SSSI) are not designated for the species. Bittern are predominately associated with components of the SPA and

Ramsar further north, notably Turnford & Cheshunt Pits SSSI, over 10km north of the SPA/Ramsar components which are the focus of this assessment in proximity to LBTH. It is therefore concluded that this aspect of the SIP is not targeted at the Habitats sites component parts within the identified Zol.

- 8.3.4 The SSSI Units underpinning the SPA and Ramsar sites for Lee Valley have all been recently assessed (2022) by Natural England to be Favourable. This applies to Units in proximity to the A503 (identified at Regulation 18 HRA Screening as the point of greatest consideration for air quality where it bisects the SPA and Ramsar) as well as Units more distant from the A503. SSSI Units outside the SPA/Ramsar but contiguous with it include those not in favourable condition, but this is clearly stated to be due to hydrological supporting processes and invasive non-native species. There is no indication of an existing adverse effect from the highway on the site condition, which could be considered to apply equally to any supporting habitat of the SPA and Ramsar.
- 8.3.5 On the basis of the points above of no detectable adverse effect associated with air quality on the SPA and Ramsar (via underpinning SSSI Units), and the absence of the qualifying feature for which triggers the SIP consideration of air quality as a threat within the overall Lee Valley SPA, it is considered that air quality can be discounted from further consideration of Likely Significant Effects on the Lee Valley SPA and Ramsar sites.

Recreational Pressure due to public access / disturbance

- 8.3.6 This section considers the potential adverse effects on integrity of Lee Valley SPA and Ramsar from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development in the Borough.
- 8.3.7 The basis of this assessment lies with the precautionary approach taken for maximum trip distance within an Inner London location of 7.2km for residents within the Borough and the propensity to use Habitats sites as a recreational resource given the geographical location of the allocated sites noted in the emerging Local Plan.
- 8.3.8 The closest Proposed Allocation is Hackney Wick Station, which is located 3.83km from the SPA / Ramsar with a total of 800 units allocated as part of this development site. A further 17 Proposed Allocations fall within the 7.2km Zol.
- 8.3.9 All other proposed allocations fall outside of this Zol and therefore increased recreational pressure on the SPA / Ramsar as a result of these allocations can be scoped out of further assessment and not considered further within this screening exercise.
- 8.3.10 The 7.2km average trip distance from allocations has been used as a precautionary figure to screen the likelihood of new residents visiting any individual Habitats site and ensuring all relevant Habitats sites were included

in the Screening stage. When considering other distance criteria to use, a review of available visitor surveys and Habitats sites within and in proximity to London demonstrates that visitor pressure is most likely to arise from a smaller catchment area than the 7.2km applied at this screening stage.

- 8.3.11 The results obtained from Epping Forest surveys of visitor pressure (Liley *et al*, 2018) identified a threshold of 6.2km where visitor numbers from outside this area dropped to ‘very low’.
- 8.3.12 The results obtained from a similar survey at Burnham Beeches (Liley *et al*, 2018) under an identical methodology identified that visitor numbers dropped to a ‘low’ threshold from 5km from the Habitats sites.
- 8.3.13 Walthamstow Reservoirs Site of Scientific Interest (SSSI) comprises of 10 SSSI units which overlap with the SPA / Ramsar designation. A recent assessment of all SSSI units was carried out in March 2022³², which concluded that all 10 units were in favourable condition, with the following commentary provided:

‘An assessment was carried out looking at bird data provided by the BTO and LWT. The assessment was based upon the guidelines for the selection of ornithological SSSI’s and the monitoring specification for the site. All features are assessed across all units regardless of location. Condition is assessed across the whole site. The site remains an important stronghold for wintering birds including Cormorant, Tufted Duck and Shoveler. For Cormorant and Tufted Ducks numbers exceed the target for the site, for Shoveler numbers have declined in recent years however this is due to them being more widely dispersed across the South-east now and the decline is not as a result of recreational disturbance or a lack in suitable habitat at the site....All features are in a favourable condition.

- 8.3.14 It should be noted that the HRA prepared for the London Plan (AECOM, 2019) stated that for Lee Valley SPA / Ramsar that *A single London Plan policy (Policy H1: Increasing Housing Supply) may result in increased urbanisation and demand for recreational greenspace, and has the potential to impact upon the SPA/Ramsar site*. It further added that *‘Future updates to the London Plan and any HRA work will need to take account of the results of planned long-term visitor monitoring of the site’*.

Assessment of potential effects

- 8.3.15 The SIP for Lee Valley SPA identifies that areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog

³² [Site feature condition \(naturalengland.org.uk\)](https://naturalengland.org.uk).

walking which have the potential to affect SPA and Ramsar populations directly or indirectly. The closest proposed allocation is Hackney Wick Station, 3.83km from the designated site. Increased recreational pressure as a result of additional housing and new employment space within the Borough as set out under Policy HF1 and EG2 of the Local Plan could be directed at the green spaces in the north-east of the Borough, notably Victoria Park and Hackney Marshes, which form a continuous corridor of green infrastructure north to these Habitats sites.

Conclusions

- 8.3.16 Likely Significant Effects cannot be ruled out for Lee Valley SPA and Ramsar as a result of increased recreational pressure led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

Hydrological Changes

- 8.3.17 This section considers the potential adverse effects on integrity of Lee Valley SPA and Ramsar from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development.
- 8.3.18 Development supported by the new LBTH Local Plan is likely to increase demand for water which could indirectly impact Lee Valley SPA and Ramsar as part of it forms the PWS system in London.
- 8.3.19 Potable water in the borough is supplied by Thames Water as part of its London Water Resource Zone (WRZ). The London WRZ is supplied primarily from surface water resources of the River Thames and River Lee (80%), either directly or via storage reservoirs, with the remainder comprising groundwater abstractions. The London WRZ is an integrated system and so direct and specific supply relationships cannot necessarily be made – i.e. it is rarely possible or appropriate to identify a particular ‘source’ for water supply to a specific area. Consequently, direct effects on specific European sites as a result of development within the borough cannot necessarily be identified or quantified.
- 8.3.20 The water resources planning process helps to ensure that growth in water demand does not affect European sites. The Water Industry Act 1991, as amended by the Water Act 2003 and Water Act 2014, requires that all water companies must publish a Water Resources Management Plan (WRMP) that sets out their strategy for managing water resources across their supply areas over the next 25 years and beyond. WRMPs use calculations of Deployable Output (DO) to establish supply/demand balances; this enables water companies to identify those WRZs with potential supply deficits over the planning period. The calculations account for any reductions in abstraction that are required to safeguard European sites and so the WRMP process (with other regulations) helps ensure (as far as is achievable) that future changes in demand will not affect any European sites.

- 8.3.21 Thames Water has accounted for the growth supported by the London Plan in forecasting for the 2019 WRMP and has predicted future deficits from the beginning of the new planning period due to the projected increase in population and the effects of climate change. Thames Water broadly plans to meet these deficits through demand-reduction, new resource exploitation and water transfers into the WRZs using new and existing infrastructure.
- 8.3.22 The 2019 WRMP has been subject to HRA, which has concluded that it will have no adverse effects on any European sites, including Lee Valley SPA/Ramsar and this has been updated by the Revised Draft WRMP 2024³³. The WRMPs provide the best estimate of future water resource demand, and therefore it is reasonable to assume that the growth set out in the Local Plan can be accommodated without significant effects on any European sites due to PWS abstractions. Furthermore, since the WRMPs explicitly account for the growth predicted by the London Plan, 'in combination' effects between the Local Plan and the WRMP are unlikely to occur.

Assessment of potential effects

- 8.3.23 Parts of the SPA and Ramsar (Walthamstow reservoirs) also form part of the PWS system in London and so it is unlikely that these designations would experience LSE as a result of competition for water resources with that required for public consumption. The WRMP HRA (and HRA of the Revised Draft) has demonstrated that there will be no LSE and/or no adverse effect on site integrity on this site as a result of the WRMP options. Local water-level management is critical to site integrity, although this is closely managed and the Local Plan will not affect the flooding / water management regime employed within the SPA / Ramsar.

Conclusions

- 8.3.24 Although areas of the SPA and Ramsar (Walthamstow reservoirs) form part of the PWS system, the WRMP HRA process has demonstrated that there will be no adverse effects on this site as a result of the WRMP options. This is inherently an in-combination effect pathway as the WRMP does not provide reliable sources to assess the contribution on the LBTH Local Plan 'alone'. As it is uncertain which elements of the WRMP rely on mitigation measures, this effect pathway remains screened-in for Appropriate Assessment.

³³ [Document library - Thames Water Resources Management Plan \(thames-wrmp.co.uk\)](https://thames-wrmp.co.uk)

8.4 In-combination assessment

- 8.4.1 The Habitats sites considered in this assessment alone sit within the geographical area surrounded by six Boroughs within Greater London: Newham, Greenwich, Lewisham, Southwark, City of London and Hackney. The London Plan developed by the Greater London Authority (GLA) also covers the LBTH Area.
- 8.4.2 For each of the Local Plans there are also reports to inform the HRA and these have been consulted where available in this in-combination assessment. The findings from this work are summarise below. Note that the preceding consideration of water resources is by necessity an in-combination assessment and is not reproduced here.
- 8.4.3 Newham Council: It is understood that a Local Plan Refresh is currently underway for Newham Council, however to support their 2018 Local Plan the HRA concluded that *'policies within the plan can be screened out and an Appropriate Assessment for the local plan is not necessary'*
- 8.4.4 Royal Borough of Greenwich: A new Local Plan is currently underway to replace their adopted Core Strategy, with consultation running from 11th July 2023 to 5th September 2023. However, there is no HRA evidence on the portal.
- 8.4.5 Lewisham Council: Consultation on the Regulation 19 Draft Local Plan was undertaken between 1st March and 25th April 2023. The supporting Habitat Regulations Assessment concluded that *'the Lewisham Local Plan will not result in a likely significant effect on any European designated sites either alone or in combination'*. (AECOM, 2022).
- 8.4.6 Southwark Council: The Southwark Plan was adopted on the 23rd February 2022. The supporting HRA stated: The policies introduced under the Southwark Plan 2022 have been shown to pose 'no significant effects, alone or in combination' when assessed against the provisions of Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). *This conclusion has been accepted by Natural England following formal consultation 31 It is not therefore not considered necessary to carry out Stage 2 (Appropriate Assessment) and Stage 3 (mitigation and alternative solutions) of the Habitats Regulations Appropriate Assessment.*
- 8.4.7 City of London: The City of London Corporation is currently consulting on the Draft City Plan 2040. The supporting HRA concluded that: *'Since no likely significant effects on European sites have been identified, no recommendations for changes to the Proposed Submission Draft City Plan or for further HRA work have been made'* (LUC, 2021).
- 8.4.8 Hackney Council: The new local plan was adopted in July 2020. There is is no HRA supporting evidence on the portal.
- 8.4.9 The London Plan (Greater London Authority) also covering LBTH and the above listed London Boroughs stated: *"it was concluded that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be*

delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects.

- 8.4.10 No HRA documentation is available for Royal Borough of Greenwich Council and therefore it is unknown if LSE exist as a result of their Local Plans. As such, taken together, in-combination LSE cannot be ruled on Habitats sites as a result of policies in the emerging Local Plan when considered with other strategic plans.

Conclusion

- 8.4.11 For the impact pathways identified at HRA Stage 1 Screening, other Local Plan policies in proximity to LBTH have concluded lower risks to Habitats sites, generally no LSE, but the approaches and conclusions are not universally consistent, based on geographical locations and when the Local Plan and associated assessments were undertaken. A precautionary approach has therefore been taken to Screening and Appropriate Assessment of the LBTH Local Plan based on specific consideration of individual allocations, the existing pressures, threats and pathways associated with the Habitats sites within the ZoI, and the most robust available information to support infrastructure planning underpinning any growth within the Borough.
- 8.4.12 No specific additional impact pathways have been identified as part of the in-combination assessment (noting that any mitigation required as part of water resource planning has already been identified in that Screening assessment element).

9 Stage 2 Appropriate Assessment

- 9.1.1 The following LBTH Policies were screened-in at HRA Stage 1 Screening:
- HF1 – Meeting housing needs,
 - EG2 – New employment space and
 - BO2 – Open spaces and the Green Grid networks
- 9.1.2 The impact pathways forming a basis of this screening were identified as follows:
- In the case of Policies HF1 and EG2 they have the potential for increased traffic (and therefore impacts on air quality), on Epping Forest SAC;
 - Policies HF1 and EG2 were also screened-in for the potential for increased demand on water resources (and therefore resulting in hydrological changes) to Lee Valley SPA and Ramsar; and,
 - Policies HF1, EG2 and B02 were screened-in due to potential increased recreational pressures and therefore disturbance on Epping Forest SAC and Lee Valley SPA and Ramsar..
- 9.1.3 This was further refined through HRA Stage 1 Screening discussion to exclude a number of site allocations and support a site-specific approach to Stage 2 Appropriate Assessment.
- 9.1.4 For the air quality impact pathway, allocations under HF1 and EG2 were screened-in as follows:
- 3.6 – Hackney Wick Station
 - 3.7 – Hepscoot Road
 - 3.8 – Sweetwater
- 9.1.5 For the recreational impact pathway, allocations under HF1 and EG2 were screened-in as follows:
- 3.6 - Hackney Wick Station
 - 3.7 - Hepscoot Road
 - 3.8 - Sweetwater
 - 3.4 - Bromley by Bow

BO2 – Open spaces and the Green Grid networks

- 9.1.6 Following HRA Stage 1 Screening, it has been clarified that no delivery under this policy will extend to networks outside the Borough (and therefore any new or additional connection to habitats sites). In conjunction with the Appropriate Assessment set out for recreational impact pathways, it is not considered that this Policy has potential at a Plan level within the Borough to result in an adverse effect

on the integrity of Habitats sites. Should individual projects come forwards which do not conform to this assumption, it will be necessary to undertake a project-level HRA to ensure that any adverse effects can be avoided, or as necessary, mitigated.

Water Resources Impact Pathway

- 9.1.7 HRA Stage 1 Screening comprised an inherently in-combination assessment on the potential impact pathway of water resource use and LBTH Local Plan Policies HF1 and EG2 relating to site allocations. The main source of information in informing this assessment is the Thames Water WRMP information (2019 as adopted, 2024 updated draft), which is not something that can be effectively replicated at a Borough scale due to the large geographical nature of water resources.
- 9.1.8 It is noted that water-dependent habitats sites, specifically Lee Valley SPA and Ramsar, are specifically assessed throughout the supporting HRA information for the WRMP under a number of potential strategic measures. All of the assessment outcomes for these WRMP component projects conclude either no LSE, or no adverse effect on site integrity, once mitigation is applied.
- 9.1.9 As this conclusion on water resources has been reached for certain WRMP component projects after the application of mitigation, this impact pathway has been included within this Appropriate Assessment for the LBTH Local Plan as a potential contributor to the need for these infrastructure projects and therefore an in-combination impact pathway may be present.
- 9.1.10 Providing the mitigation measures identified with the WRMP assessments are implemented, the LBTH Local Plan HRA has concluded that this impact pathway will not result in an adverse effect on site integrity of Lee Valley SPA (and Ramsar designation) and this impact pathway will not be considered further in this HRA.

Epping Forest SAC

Epping Forest – Recreation

- 9.1.11 Following detailed consideration of access routes and clarification over Policy BO2 that new recreational access routes will not be created to improve links to Epping Forest SAC, a refined consideration of access routes within the 6.2km potential Zol has been applied.
- 9.1.12 LBTH is separated from Epping Forest SAC by extensive urban development in the Leyton area, with very limited public rights of way or desirable access routes. This contrasts with the existing extensive open green space provided closer to and within the Borough at Victoria Park and Hackney Marshes. In considering how residents access suitable green space, it is not considered likely that residents would travel past these accessible areas, as improved under Policy BO2, to contribute to pressures at Epping Forest. Access points to Epping Forest SAC via these green routes is possible, but involves journeys significantly in excess of the indicated 6.2km trip length.

9.1.13 Based on the Epping Forest Visitor Survey (Footprint Ecology, 2017), the following points are considered relevant in reaching this conclusion:

- 99% of interviewees had come for a short visit directly from home (i.e. as opposed to being on holiday or staying away from home in the area);
- Dog walking was the commonest activity (49% of interviewees), with other activities including walking (22%), outing with the family (9%), cycling/mountain biking (8%) and jogging/running/power walking (5%);
- Visits were typically relatively short, either 30 minutes to an hour (33% of interviewees) or 1-2 hours (43%);
- More than three-quarters (77%) of those interviewed had arrived by car. A further 14% had arrived on foot and 5% by bicycle.
- ... the survey point with the most people entering or passing was, by some considerable margin, Connaught Water (13.2km from LBTH boundary).
- Besides other locations within Epping Forest (cited by 16% of interviewees), the most commonly named alternatives were the Lee Valley, Wansted, Chingford, the Roding Valley and Walthamstow Marshes/wetlands.

9.1.14 The visitor survey conclusions indicate that any residents of LBTH are unlikely to bypass the much closer alternative green spaces of the Lee Valley and associated/linked parks and green spaces (as improved under Local Plan policies), to preferentially travel to Epping Forest (including by car) at a considerably greater distance, when the majority reasons for such visits are associated with routine activities for short durations.

9.1.15 Due to a lack of access connectivity, an adverse effect on site integrity on Epping Forest SAC from the Local Plan as a result of recreational pressure is not anticipated.

Epping Forest – Air Quality

9.1.16 Following the screened-in impact pathway for air quality effects, further consideration has been given to the specific allocations identified to take account of existing Plan-level HRA outcomes and the details of the allocations themselves.

9.1.17 The locations of the proposed site allocations were considered relative to Epping Forest SAC. Three site allocations were shortlisted due to an identified receptor pathway. These were: Hackney Wick Station, Hepscott Road, and Sweetwater.

9.1.18 All three of these sites are located within the administrative boundary of the LLDC and as such have already been subject to HRA. The LLDC Local Plan HRA concluded that there would be no LSE on Epping Forest SAC providing the following mitigation is implemented:

“Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where: ... An air quality assessment shows

that a proposed development would result in significant effects on habitats within European Sites.”

9.1.19 None of the extant planning applications for the three shortlisted site allocations have been supported by project level HRA to date. Where air quality assessments have been undertaken for the already consented schemes, these determined that effects would be not significant and in most cases below traffic data screening criterion (for human health). In general, parking was limited to blue badge holders only.

9.1.20 Notwithstanding the above, traffic data calculations were undertaken for these three sites to determine the ‘worst case’ number of trips that could travel on roads within the vicinity of Epping Forest SAC (both within London Borough of Waltham Forest and Epping Forest District Council’s administrative areas). These figures were then compared to JNCC’s decision-making thresholds to determine whether potential effects could be screened out as ‘de-minimis’ or whether further assessment was required to consider effects due to LBTH’s Local Plan, both ‘alone’ and ‘in-combination’.

9.1.21 It was noted that:

- The shortlisted sites have an existing land-use that was unable to be taken into account during the traffic data calculations. They are therefore likely to be a significant overestimation of the net change in traffic due to the emerging Local Plan.
- These represent total change within LBWF and EFDC and not the specific change on roads that lie within 200m of Epping Forest SAC.
- These assume that all cars will have tailpipe emissions (i.e. they have internal combustion engines) which is very worst case / unrealistic as the percentage of EVs is predicted to increase, especially given the policy context, the expansion of the Ultra Low Emission Zone, and measures with Tower Hamlets Transport Strategy regarding EV charging provision.

9.1.22 The subsequent qualitative assessment included evidence and trend data relevant to trip length, trip destination, travel demand, modal shift, car ownership, cycling and transition to a zero-emission vehicles. This qualitative evidence supports:

- LBTH’s has the lowest level of car-ownership among all London boroughs.
- Many trips are short in length and internal to the borough.
- That the LBTH’s emerging Local Plan is likely to make a negligible contribution to in-combination effects at Epping Forest SAC.
- An increase in active travel modes, particularly cycling.
- The borough is well placed / has characteristics to enable significant growth in cycling.
- LBTH has a very strong and accessible public transport network with further improvements proposed.
- The wider climate change agenda will also support in facilitating modal shift.

- 9.1.23 LBTH's Transport Strategy has not been quantitatively assessed but contains a series of short-term and long-term actions that will be taken to support the overall objectives of the Local Plan and help to support growth within the Borough. Whilst the Transport Strategy focuses on the delivery of measures that encourage more trips by foot, bike or public transport, it is recognised that some people will only be able to travel using private vehicles for some of their journeys. Therefore, it also contains a suite of measures for supporting Tower Hamlets' transition to a zero-emission fleet including the provision of charging infrastructure for EVs.
- 9.1.24 When taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold. This is consistent with the findings of LBWF's Local Plan HRA which concluded that trips through Epping Forest SAC would be 'de-minimis' when considering the net change in trips resulting from their Local Plan (e.g. due to replacing existing development with largely car free development).
- 9.1.25 With reference to the LLDC Local Plan HRA conclusion that "*Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where: ... An air quality assessment shows that a proposed development would result in significant effects on habitats within European Sites.*" the findings of this Appropriate Assessment broadly support this conclusion, however would not seek to rely on Project level HRA as a specific mitigation measure. The conclusion of this Appropriate Assessment for the impact pathway of air quality on Epping Forest SAC is that an adverse effect of site integrity is not likely to occur when considered at a Plan level.
- 9.1.26 A Project-level HRA should be required where the assumptions set out in this assessment are deviated from.

Lee Valley SPA and Ramsar

Lee Valley – Recreation

- 9.1.27 LSE could not be ruled out for Lee Valley SPA and Ramsar as a result of increased recreational pressure led by Local Plan policies within the Borough at the HRA Stage 1 Screening Stage, as site allocations under Policies HF1 and EG2 could lead to additional residents (and potentially recreational users) within a proximity where such access could not be discounted. The closest allocation was identified as Hackney Wick Station, 3.83km for the Lee Valley Habitats Sites. Further consideration was therefore recommended at Appropriate Assessment.
- 9.1.28 In considering whether it is likely that residents of LBTH will access the location of the Habitats sites within the Lee Valley, it was noted in responses to the Epping Forest Visitor Surveys (Footprint Ecology, 2017) that the considerable majority of users of that site were accessing from local areas for routine and short-duration activities, notably dog walking and general walking. Those visitors also named Lee

Valley and Walthamstow Wetlands as suitable alternatives they would choose to visit for those purposes. It is therefore reasonable to conclude that the Lee Valley, the associated linked parks and green spaces, and the Habitats sites associated with the Lee Valley, would be attractive to new residents within a suitable range for the purposes of recreation and general access.

- 9.1.29 Consideration was therefore applied to the areas of the Lee Valley designated SPA and Ramsar, which are wholly within the Walthamstow Wetlands fully operational 160 hectare Thames Water reservoir site, managed by the London Wildlife Trust (LWT). The Habitats sites are therefore controlled in two specific and highly monitored and managed aspects: firstly, the safety and security consideration associated with reservoirs managed for public water supply by Thames Water, and secondly the active management and control of the site by the Wildlife Trust including published rules prohibiting access outside designated public areas, controlled site access hours, site ranger supervision and seasonal closures of specific areas of the sites.
- 9.1.30 The above measures are based on the geographical location of Walthamstow Wetlands within an existing highly urbanised area, where uncontrolled and unmanaged access would have previously led to significant adverse impacts on the qualifying features of the SPA and Ramsar sites. As the management approach does not therefore rely on specific numbers of nearby residents, but by strict segregation of recreational or incompatible uses of the site and Conservation Objectives without reliance on immediately adjacent functionally linked land, the presence of allocations within a Zol where residents or occupants may choose to access the location of the designations is not considered to give rise to an adverse effect on site integrity, providing effective management of all recreational/disturbance continues.
- 9.1.31 A conclusion of no adverse effect on site integrity as a result of recreational and disturbance pressure on the Lee Valley SPA and Ramsar sites as a result of the LBTH Local plan can therefore be reached, including the consideration of this (in place and functioning) mitigation.

10 Conclusions

- 10.1.1 This document provides guidance on the likely data sources, information requirements and the process of HRA Screening and Appropriate Assessment. It also provides a discussion of where the ecological implications of the LBTH Local Plan have been considered and which Habitats sites are vulnerable to known pressures, threats and existing impacts.
- 10.1.2 There are no Habitats sites within LBTH's administrative area, however there are three Habitats sites that fall within the identified precautionary 7.2km Zol of the Borough boundary (Epping Forest SAC; Lee Valley SPA and Ramsar site) and as such impact pathways for these Habitats sites from the policies of the Local Plan have been carefully considered.
- 10.1.3 A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HF1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 Appropriate Assessment. These policies were identified to have potential for Likely Significant Effects on nearby Habitats sites relating to increased or re-distributed traffic (and therefore impacts on air quality), water resource implications, and increased public access, recreational and disturbance pressures.
- 10.1.4 At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 10.1.5 Policy BO2 was subject to further consultation with the Plan-making body (LBTH) and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 10.1.6 Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1 resulted in a conclusion when taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold. This is consistent with the findings of LBWF's Local Plan HRA which concluded that trips through Epping Forest SAC would be 'de-minimis' when considering the net change in trips resulting from their Local Plan (e.g. due to replacing existing development with largely car free development).
- 10.1.7 Air quality considerations at Appropriate Assessment for Lee Valley SPA and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway, but also that the qualifying feature (Bittern) for

which air quality is indicated as a possible pressure or threat is not anticipated to be present within the components of the SPA/Ramsar within the Zone of Influence of LBTH.

- 10.1.8 Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plan. It is acknowledged that under some scenarios and strategic projects, this conclusion is supported by the use of mitigation measures.
- 10.1.9 Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways between LBTH (as opposed to ‘as the crow flies’ distances), the reasons for visits to Epping Forest as derived from published visitor surveys, and the presence of more extensive and equally attractive green spaces closer to LBTH for those activities.
- 10.1.10 Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements within the Zone of Influence of LBTH (a component of the overall SPA and Ramsar in the Lee Valley) being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access. This mitigation for existing significant recreational and disturbance pressure is considered to be in place, effective and functioning in a manner that is not dependent on Local Plan allocations and overall resident numbers.
- 10.1.11 The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 10.1.12 For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified. In two instances this has included consideration of mitigation, but these measures are already in place and functioning, or proposed to address in-combination effects as part of strategic infrastructure delivery, not reliant on specific actions undertaken by LBTH.
- 10.1.13 Should separate Plans of projects come forwards which deviate from the assumptions set out here in this Plan-level HRA, a Project -level HRA should be undertaken to confirm that the conclusions set out here remain accurate and address any additional avoidance or mitigation measures, as necessary.

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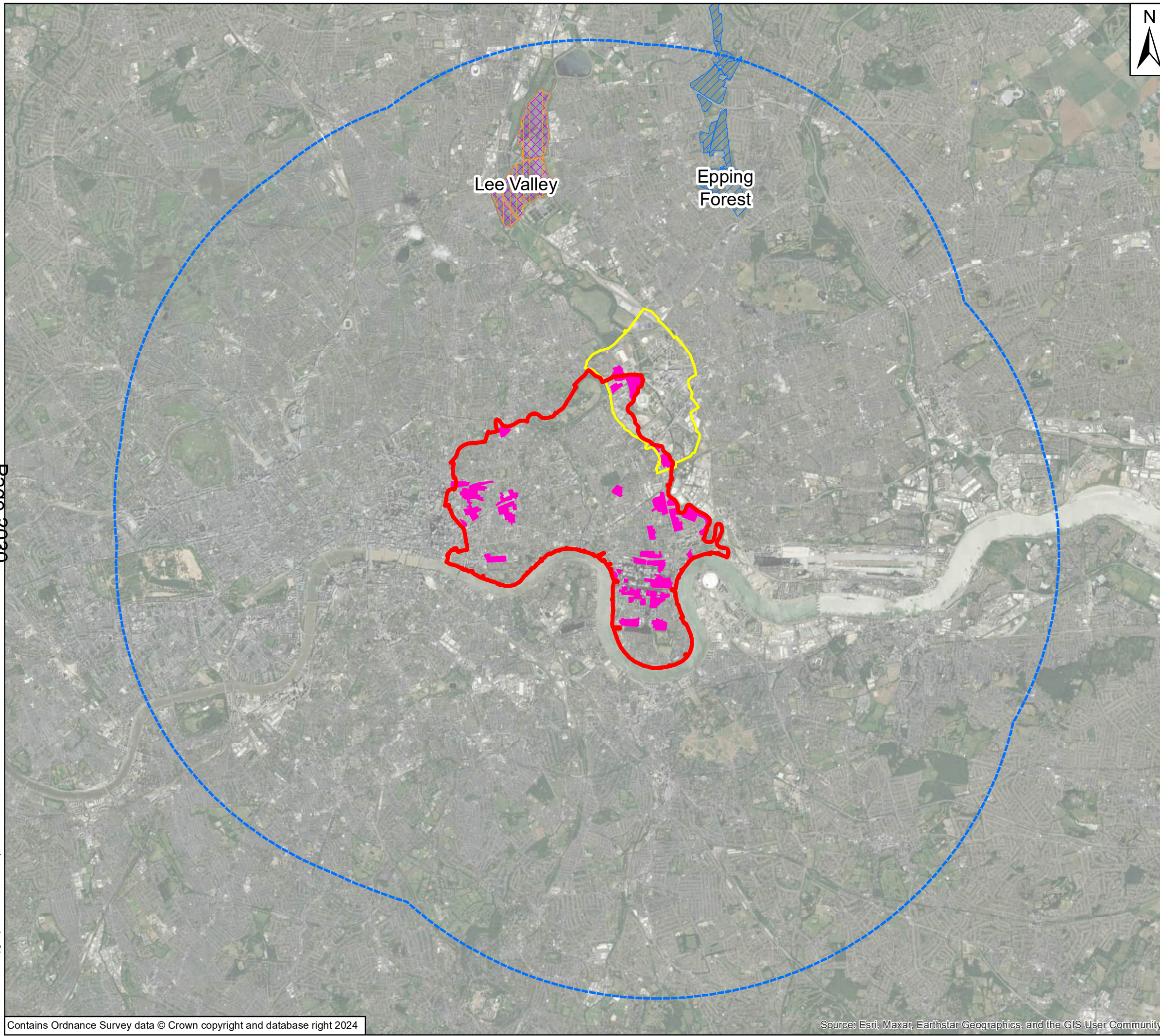
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Figures

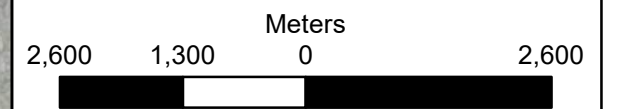
Figure 1 – Habitats Sites within a 7.2km Zol of LBTH allocated sites

Figure 2 – Allocated Sites within Epping Forest SAC buffer zones and Air Quality Zol



Key

- London Borough of Tower Hamlets (LBTH)
- London Legacy Development Corporation (LLDC)
- 7.2km Zone of Influence (Zoi)
- Special Area of Conservation
- Special Protection Area
- Ramsar Site - Wetland of International Importance
- Allocated Sites

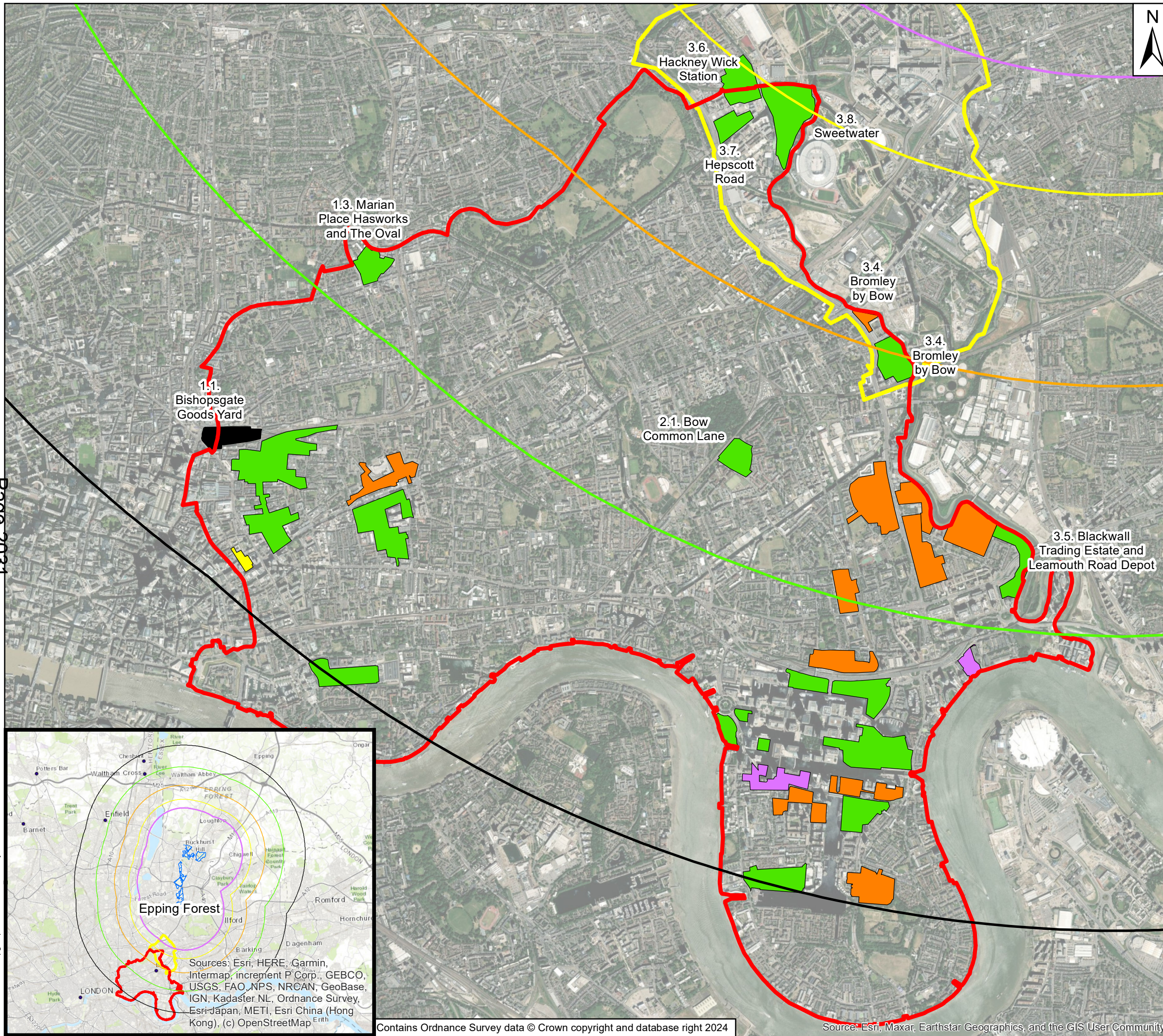


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London Borough of Tower Hamlets

Project:
London Borough of Tower Hamlets
New Local Plan

Title:
Habitat Sites within a 7.2km Zoi of
LBTH allocated sites

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Key

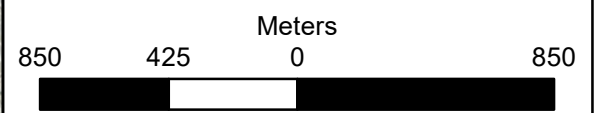
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- London Legacy Development Corporation (LDCC)
- Special Area of Conservation

Air Quality Zol Buffers of SAC

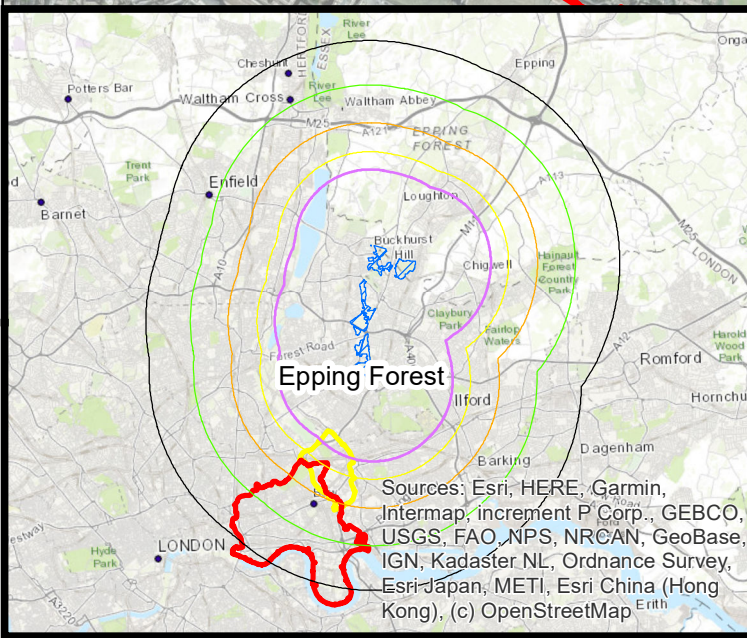
- 3.4km of SAC
- 4.2km of SAC
- 5.5km of SAC
- 7.2km of SAC
- 9.2km of SAC

Allocated Sites-Air Quality Zol Buffers

- 3.4 km
- 4.2 km
- 5.5 km
- 7.2 km
- 9.2 km



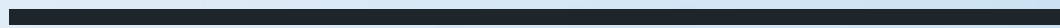
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Project:	London Borough of Tower Hamlets New Local Plan		
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Date:	21/06/2024	Checked:	XXX
Scale:	25,000 @ A3	Approved:	OP



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster.NL, Ordnance Survey, Esri-Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap

Appendix A

CJEU Rulings



The Council for Justice of the European Union (CJEU) rulings

A number of CJEU rulings are relevant to the HRA screening exercise and are noted below. At the present time the position, under section 6(3) EU (Withdrawal) Act 2018 (as amended), is that the courts in the UK, with the sole exception of the Supreme Court, will continue to be bound by HRA judgments handed down by the CJEU and by domestic courts prior to 31 December 2020 when interpreting the Conservation of Habitats and Species Regulations 2017 (as amended). This is the case as long as the Conservation of Habitats and Species Regulations 2017 (as amended) remain unmodified by Parliament. The Supreme Court will, however, be at liberty to depart from these judgments after 31 December 2020 if they consider it appropriate to do so.³⁴

The Wealden Judgement

The Wealden Judgement³⁵, handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.

Prior to this Judgement, air quality impacts on Habitats sites were only considered alongside roads where the traffic growth associated with the individual Plan or Project being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07³⁶), which has been subsequently withdrawn namely:

- increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).

The Wealden Judgement found that the application of the criteria to the traffic growth associated with a single Local Plan was unsound on the basis that two Local Plans collectively contributing more than 1000 AADT could lead to a potentially significant effect. The Judge determined that further assessment of air quality impacts on Habitats sites

³⁴ Freeths Habitats Regulations update 2020. Available at: <https://communications.freeths.co.uk/44/1637/october-2020/the-habitats-regulations-assessment-regime-after-31-december-2020---how-will-it-look-.asp?sid=8bf6fad5-597a-43c6-8f70-61503ec0adb9>

³⁵ Judgment in Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.

³⁶ *Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)*. Withdrawn, but available online: <https://standardsforhighways.co.uk/dmrb/archive/search/df0c77ed-887b-4c84-be0e-000fe18545ae>

should have been carried out and quashed part of the Local Plan that would have led to an in-combination exceedance of 1,000 AADT.

The Wealden Judgement means that every single plan or project which, alone, is predicted to give rise to any increase in traffic or other air emission (however small) must be subjected to an in-combination assessment with other plans or projects (which would include those plans or projects with a similar tiny impact). However, the judgement did not rule out the application of thresholds in principal and this approach is normally taken as the basis of the assessment.

The judgement has led to a more detailed analysis of three key questions to discern which plans and project are those where a detailed “in combination” assessment is required in relation to changes in air quality:

1. Is your plan or project putting emissions into the air?;
2. If so, are those emissions at a level where they could actually be measured / perceived?; and
3. If so, is there a realistic (rather than hypothetical) risk that those emissions, alone, will have an adverse effect on the ecology of a SAC / SPA?

A fuller justification will be required when applying the threshold approach.

People over Wind (The Sweetman Case)

The Court of Justice of the European Union’s (CJEU’s) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17)³⁷ (hereafter referred to as the ‘Sweetman Case’), states that:

‘Article 6(3) must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.’

In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the

³⁷ Judgement of the Court 12 April 2018, People Over Wind, Peter Sweetman, Coillte Teoranta Available online: <https://curia.europa.eu/juris/document/document.jsf?jsessionid=B02FE6F4F1C61308615DBBDF079EE5F4?text=&docid=200970&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=11190634>

Habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.

This is an emerging issue for local authorities and means that, because of the potential for 'in-combination effects and the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats sites. Therefore, it is becoming increasingly commonplace for local authorities to conduct an Appropriate Assessment of all project, plans and planning applications (i.e. these are often no longer screened out, by way of an HRA Screening as has been the practise to date).

CJEU Ruling in the Netherlands nitrogen and agriculture cases c-293/17 and c-294/17

The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality. Notably, the Court of Justice of the European Union ruled that:

- An 'Appropriate Assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.
- National measures such as procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying with Article 6(2).

Of particular relevance to the assessment of air quality effects on Habitats sites, the Court of Justice of the European Union ruled that:

"An 'Appropriate Assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.

The Ruling makes clear that certainty and a thorough and in-depth examination of the scientific soundness is required that that there is no reasonable scientific doubt as to the absence of adverse effects of each plan or project on the integrity of the site concerned.

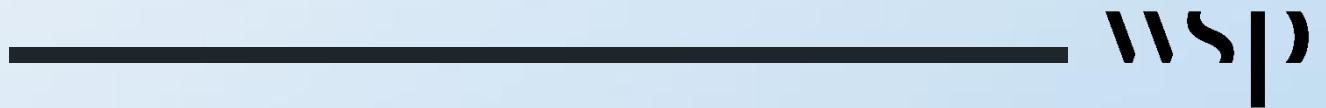
Kokott Ruling

In the Opinion of Advocate General Kokott in Case C-6/04 Commission v UK [2005] ECR I-9017 at paragraph 49 she noted that an assessment of plans cannot by definition take into account all effects because

“Many details are regularly not settled until the time of the final permission” and “[i]t would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure”.

Appendix B

Habitats Sites Details, Including Qualifying Features and Conservation Objectives



Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
Epping Forest SAC	1630.7	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ 9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>) <p>Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i>. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.</p> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> ▪ 4030 European dry heaths <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ 1083 Stag beetle <i>Lucanus cervus</i> <p>Epping Forest is a large woodland area in which records of stag beetle are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a</p>	<ul style="list-style-type: none"> ▪ J02 – Human induced changes in hydraulic conditions ▪ A04 – Grazing ▪ G01 – Outdoor sports and leisure activities, recreational activities ▪ H04 – Air pollution, air-borne pollutants ▪ M02 – Changes in biotic conditions³⁸ 	<ul style="list-style-type: none"> ▪ P – Air Pollution: impact of atmospheric nitrogen deposition ▪ P - Undergrazing ▪ P - Public Access/Disturbance ▪ T – Changes in species distributions ▪ T – Inappropriate water levels ▪ T – Water Pollution ▪ T – Invasive species ▪ T – Disease ▪ P/T – Invasive species³⁹ 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.⁴⁰

³⁸ Epping Forest SAC Natura 2000 form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012720.pdf>

³⁹ Epping Forest Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5732004727881728>

⁴⁰ Epping Forest SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/file/5442443424301056>

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.			
Lee Valley SPA	451.3	<p>ARTICLE 4.1 QUALIFICATION (79/409/EEC) Over winter the area regularly supports:</p> <ul style="list-style-type: none"> ▪ Bittern <i>Botaurus stellaris</i> (Europe - breeding) 6% of the GB population Five year peak mean for 1992/93 to 1996/97 <p>ARTICLE 4.2 QUALIFICATION (79/409/EEC) Over winter the area regularly supports:</p> <ul style="list-style-type: none"> ▪ Northern shoveler <i>Anas clypeata</i> (North-western/Central Europe) 1% of the population 5 year peak mean, 1993/4-1997/8 ▪ Gadwall <i>Anas strepera</i> (North-western Europe) 1.5% of the population 5 year peak mean, 1993/4-1997/8 	<ul style="list-style-type: none"> ▪ J02 – Human induced changes in hydraulic conditions ▪ H02 – Pollution to groundwater (point sources and diffuse sources) ▪ G01 – Outdoor sports and leisure activities, recreational activities ▪ K02 – Biocenotic evolution, succession ▪ F01 – Marine and Freshwater Aquaculture⁴¹ 	<ul style="list-style-type: none"> ▪ T – Water Pollution ▪ T – Hydrological changes ▪ T – Public Access/Disturbance ▪ T – Inappropriate scrub control ▪ T – Fisheries: Fish stocking ▪ T – Invasive species ▪ T – Inappropriate cutting/mowing ▪ T – Air Pollution: risk of atmospheric nitrogen deposition⁴² 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> ▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features, and, ▪ The distribution of the qualifying features within the site.⁴³
Lee Valley Ramsar	447.9	<p>Ramsar criterion 2 - supports vulnerable, endangered, or critically endangered species or threatened ecological communities.</p> <p>Nationally important species occurring on the site: Whorled water milfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a waterboatman).</p> <p>Ramsar criterion 6 – species occurring at levels of international importance (as identified at designation).</p> <p>Over winter the site regularly supports:</p>	<ul style="list-style-type: none"> ▪ Vegetation succession ▪ Water diversion for irrigation/domestic/industrial use ▪ Eutrophication ▪ Persistent drought ▪ Introduction/invasion of exotic plant species ▪ Recreational/tourism disturbance (unspecified) ▪ General disturbance from human activities 		

⁴¹ Lee Valley SPA Natura 2000 form. Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012111.pdf>

⁴² Lee Valley Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5788502547496960>

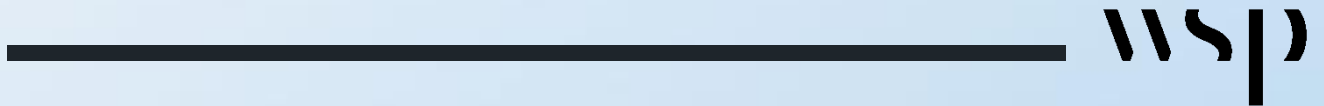
⁴³ Lee Valley SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/file/6516586265706496>

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		<ul style="list-style-type: none"> ▪ Gadwall <i>Anas strepera</i> (North-western Europe). 456 individuals, representing an average of 1.5% of the population (Five-year peak mean for 1993/94 to 1997/98) ▪ Northern shoveler <i>Anas clypeata</i> (North-western/Central Europe). 406 individuals, representing an average of 1% of the population (Five-year peak mean for 1993/94 to 1997/98). 	<ul style="list-style-type: none"> ▪ Unspecified development: urban use⁴⁴ 		

⁴⁴ Lee Valley Ramsar Information Sheet. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1037RIS.pdf>

Appendix C

**APIS Information for SPA and SAC
Sites within 7.2km of the Allocated
Sites (2023 data)**



Site	Species	Relevant Critical Load			N Deposition kg N/ha/yr			Ammonia Critical Level $\mu\text{g NH}_3/\text{m}^3$ annual mean	NH ₃ Concentration $\mu\text{g}/\text{m}^3$		
		Relevant Habitat	Relevant CL Habitat	CL Range	Maximum	Minimum	Average		Maximum	Minimum	Average
Lee Valley SPA & Ramsar	<i>Anas clypeata</i> (North-western/Central Europe)	N/A	No comparable habitat with established critical load estimate available	N/A	18.6	14.4	15.9	3	2.2	1.5	1.7
	<i>Anas strepera</i> (North-western Europe)	N/A	No comparable habitat with established critical load estimate available	N/A	18.6	14.4	15.9	3	2.2	1.5	1.7
	<i>Botaurus stellaris</i> (Europe - breeding)	Rich fens	Rich fens	15 - 25	18.6	14.4	15.9	3	2.2	1.5	1.7
Epping Forest SAC	<i>Erica tetralix</i>	Northern Atlantic wet heaths	Northern wet heath	5 - 15	17.9	15.3	16.8	1	2.0	1.4	1.6
	European dry heaths	European dry heaths	Dry heaths	5 - 15	17.9	15.3	16.8	1	2.0	1.4	1.6
	Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robur-petraeae or Ilici-Fagenion)	Atlantic acidophilous beech forests	Fagus forest on non-acid and acid soils	10 - 15	32.2	27.0	29.7	1 or 3	2.0	1.4	1.6
	<i>Lucanus cervus</i>	Broadleaved deciduous woodland	Broadleaved deciduous woodland	10 - 15	32.2	27.0	29.7	3	2.0	1.4	1.6
	<i>Triturus cristatus</i>	No comparable habitat with established critical load estimate available	No comparable habitat with established critical load estimate available	N/A	18.1	11.2	13.5	3	2.0	1.4	1.6

Appendix D

Annual Mean NOX Concentrations

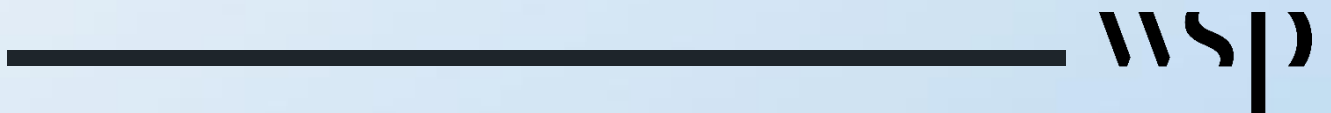


Table D-1 – Estimated 2023 annual mean background NO_x concentrations for the area encompassing Lee Valley SPA and Ramsar

X	Y	Total 2023 background NO _x concentration (µg/m ³)**
534500	187500	29.4
534500	188500	27.2
533500	188500	27.0
534500	189500	30.6
535500	189500	28.3
535500	190500	27.7
536500	201500	18.0
537500	201500	16.3
536500	202500	17.2
537500	202500	14.8
536500	203500	16.1
537500	203500	14.0
536500	204500	16.8
537500	204500	13.6
538500	209500	17.1
539500	209500	14.1
538500	210500	15.3
539500	210500	16.4
537500	212500	13.1
538500	212500	12.7
537500	213500	11.9

*Exceedances of the Critical Level are shown in **bold**.

**Data taken from Defra’s webpages

Table D-2 – Estimated 2023 annual mean background NO_x concentration for the area encompassing Epping Forest SAC

X	Y	Total 2023 background NO _x concentration (µg/m ³)**
538500	188500	31.5
539500	188500	29.4
538500	189500	29.2
539500	189500	28.3
538500	190500	33.6
539500	190500	35.7
538500	191500	27.4
539500	191500	27.1
539500	192500	23.8
540500	192500	24.6
541500	192500	24.7
539500	193500	22.6
540500	193500	23.1
541500	193500	22.7
537500	194500	22.9
538500	194500	22.8
539500	194500	21.3
540500	194500	20.9
541500	194500	21.1
537500	195500	21.7
538500	195500	19.3
539500	195500	19.9
540500	195500	20.1

X	Y	Total 2023 background NO _x concentration (µg/m ³)**
541500	195500	19.5
537500	196500	21.3
538500	196500	19.7
539500	196500	18.5
540500	196500	18.3
541500	196500	17.6
542500	196500	20.4
540500	197500	17.6
541500	197500	16.5
542500	197500	17.0
540500	198500	17.7
541500	198500	17.2
542500	198500	16.1
543500	198500	15.5
544500	198500	15.5
540500	199500	25.3
541500	199500	19.8
542500	199500	17.7
543500	199500	15.2
544500	199500	15.0
542500	200500	22.4
543500	200500	21.6
544500	200500	17.6
544500	201500	19.9

*Exceedances of the Critical Level are shown in **bold**. **Data taken from Defra's webpages

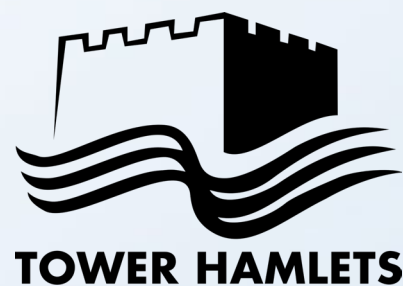


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Tower Hamlets Borough Council

New Local Plan

Interim Integrated Impact Assessment Report
Non-Technical Summary



Tower Hamlets Borough Council

New Local Plan

Interim Integrated Impact Assessment Report Non-Technical Summary

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1 Introduction

1.1 Overview

- 1.1.1 The London Borough of Tower Hamlets (here in referred to as LBTH) is in the process of preparing a new Local Plan for the borough. The new Local Plan will set out how development will be planned and managed across the borough through to 2038.
- 1.1.2 It will set out how the borough can sustainably develop, identifying the number of new homes, jobs and facilities needed to support the growing and changing population, as well as protecting all the features that the borough's communities cherish, such as town centres, parks and open spaces, waterways, cultural and historic buildings.

1.2 The New Local Plan

- 1.2.1 The new Local Plan will set out the vision for the future of the borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of the environment, green spaces and cultural and historic assets.
- 1.2.2 Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the borough will develop through to 2040.
- 1.2.3 The Local Plan seeks to build upon feedback from public consultations and respond to the many ideas and key issues identified by local communities, and stakeholders that have contributed to the plan-making process so far. It sets out a shared vision for the future of the borough and includes the proposed strategy and planning policies that will help guide and manage development in the area over the new Local Plan period (2025 to 2040).
- 1.2.4 The new Local Plan includes 72 policies and 24 site allocations, with an additional 16 alternative sites.
- 1.2.5 Further details on the vision, objectives and policies can be found in **Section 2** of the main **IIA Report**.

2 Methodology

2.1 What is IIA?

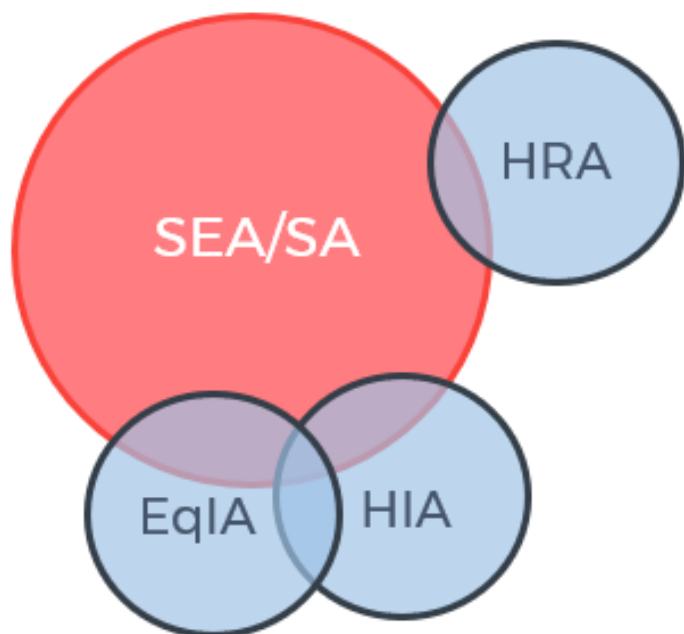
2.1.1 Sustainability Appraisal is a systematic process that is undertaken during the preparation of a plan. Its role is to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.

2.1.2 The IIA combines the following assessment processes:

- Strategic Environmental Assessment (SEA);
- Sustainability Appraisal (SA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA).

2.1.3 **Figure 2-1** below shows the relationship of each of these IIA elements.

Figure 2-1 - Relationship of IIA Elements



2.1.4 An integrated assessment approach enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. A single process can improve efficiencies in

the assessment itself, as many of the issues covered in the different forms of assessment overlap. This process also helps to simplify outcomes and recommendations for policymakers.

2.1.5 Each component of the assessment has been described below:

- **SA:** The SA process is carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which emerging plans will help to achieve relevant environmental, economic and social objectives.
- **EqIA:** The EqIA process focuses on assessing and recording the likely equalities effects as a result of a policy, project or plan. It seeks to ensure that the policy, project or plan does not discriminate or disadvantage people and enables consideration of how equality can be improved or promoted. It covers the following nine Personal Protected Characteristics:
 - Age;
 - Disability;
 - Gender;
 - Gender reassignment;
 - Marriage and civil partnership;
 - Pregnancy and maternity;
 - Race;
 - Religion or belief; and
 - Sexual orientation.
- **HIA:** The HIA process is used to identify the likely health effects of plans, policies or developments and to implement measures to avoid negative impacts and promote opportunities to maximise the benefits. There is no formally adopted methodology for HIA although there is a body of practice and guidance at a policy level.
- **HRA:** The HRA assessment is undertaken to identify whether plans or projects will be likely to have a significant effect on a designated site. The stages of HRA assessment are as follows:
 - Stage 1: Screening: initially identifies the likely impacts upon a Natura 2000 site (sites designated as Special Areas of Conservation (SACs) and Special

Protection Areas (SPAs) in the UK) of a plan or project, either alone or in combination with other plans or projects, and considers whether these impacts are likely to be significant;

- Stage 2: Appropriate Assessment: the detailed consideration of the impact on the integrity of the Natura 2000 sites of the plan or project, either alone or in combination with other plans or projects. This is to determine whether there will be adverse effects on the integrity of the site;
- Stage 3: Assessment of alternative solutions: the process which examines alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the Natura 2000 site; and
- Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain: an assessment of whether the development is necessary for imperative reasons of overriding public interest (IROPI).

2.2 IIA Methodology

2.2.1 IIA is a continual process of gathering data and evidence, assessment of environmental effects, developing mitigation measures and making recommendations to refine plans or programmes in view of the predicted environmental effects.

2.2.2 The key stages of the IIA process are the following:

- **Stage A:** Production of a scoping report which sets the context of the local plan, identified other relevant policies, plans and programmes, baseline information and sustainability objectives. This was undertaken in August 2023.
- **Stage B:** Assessment of draft policies and alternative policies and strategic and alternative sites and the preparation of the IIA Report. HIA and EqlA assessments are undertaken at the same time and the findings incorporated into the IIA Report. The report is then consulted on alongside the draft Local Plan (also referred to as Regulation 18 consultation);
- **Stage C (this stage):** Assessment of preferred policies and sites and the preparation the IIA Report. HIA and EqlA assessments are undertaken at the same time and the findings incorporated into the IIA Report;

- **Stage D:** Consultation on the preferred Local Plan and the IIA Report (also referred to as Regulation 19 consultation). The Local Plan and IIA then undergo independent examination; and
- **Stage E:** Monitoring the significant effects of implementing the Local Plan.

Full details on the methodology can be found in **Section 3** of the IIA Report.

Identification of Sustainability Issues and Opportunities

- 2.2.3 The IIA Scoping Report, outlined key baseline information, identified key sustainability issues in the borough and identified future trends which could occur without implementation of the Local Plan.
- 2.2.4 Following the findings identified at scoping, and updates based on changes in legislation and best practice guidance, an IIA Appraisal Framework has been produced, which was used to guide the assessment process of the plans and strategies.
- 2.2.5 This Appraisal Framework has guided the IIA assessment of the Local Plan and is shown below.
- **IIA1:** To build inclusive communities by reducing social exclusion, promoting equity and equality and respecting diversity.
 - **IIA2:** To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH's residents.
 - **IIA3:** To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets' town centre and other district and local centres.
 - **IIA4:** To ensure that residents have employment opportunities and access to training.
 - **IIA5:** To meet the housing needs of all of the borough's residents inclusively.
 - **IIA6:** To reduce crime and the fear of crime for all residents inclusively.
 - **IIA7:** To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally.
 - **IIA8:** To protect and enhance access to essential services and facilities for all residents.

- **IIA9:** To protect and enhance protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.
- **IIA10:** To protect and enhance the borough's townscapes and landscapes.
- **IIA11:** To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.
- **IIA12:** To reduce the risk and vulnerability to flooding.
- **IIA13:** To maintain and enhance water quality.
- **IIA14:** To protect and enhance air quality.
- **IIA15:** Ensure that Tower Hamlets is resilient to the effects of climate change.
- **IIA16:** To reduce greenhouse gas emissions, support national and local decarbonisation initiatives and encourage energy efficiency.
- **IIA17:** To reduce the amount of waste produced and minimise the amount sent to landfill.
- **IIA18:** To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.

3 IIA Assessment Findings

3.1 Assessment of Policies

- 3.1.1 The assessment of the Local Plan policies was carried out in relation to the IIA Objectives. A summary of the significant effects are detailed in **Table 3-1** below. No significant negative effects were identified.
- 3.1.2 It should be noted that the assessment of policies within themes have been standalone assessments, which purely assess the outcome of the application of those policies rather than their relationship with other policies within the Local Plan.
- 3.1.3 Further details on the assessment of the Local Plan policies can be found within **Section 6** of the main IIA Report and **Appendix F** to the main IIA Report.

Table 3-1 – Summary of Significant Effects – Policy Assessment

Significance	Number of Significant Effects	Summary of Effects
Significant Positive (++)	47	<ul style="list-style-type: none"> • Policies that build inclusive communities through the reduction of social exclusion, promotion of equity and equality, and respect diversity (IIA1). • Policies that could increase physical activity, healthy lifestyles or mental wellbeing, improving health (IIA2). • Policies that could increase employment opportunities, diversify the economy and encourage investment (IIA3). • Policies that improve employment opportunities and access to training (IIA4). • Policies that could increase the borough’s housing provision to meet the needs of residents inclusively (IIA5). • Policies that could improve crime rates and reduce the fear of crime for all residents inclusively (IIA6). • Policies that will promote traffic reduction through the promotion of sustainable transport modes and supporting residents to live more locally (IIA7).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Policies that could protect and enhance access to essential services and facilities (IIA8). • Policies that could result in the protection and enhancement of protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain (IIA9). • Policies that could protect and enhance the borough’s townscapes and landscapes (IIA10). • Policies that could protect and improve assets and their setting within the historic environment (IIA11). • Policies that could reduce the risk and vulnerability of flooding (IIA12). • Policies that could maintain and enhance water quality (IIA13). • Policies that could result in reductions in air pollutants, improving air quality (IIA14). • Policies that could improve the borough’s resilience to the effects of climate change (IIA15).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Policies that encourage net zero developments and could reduce carbon emissions and improve energy efficiency (IIA16). • Policies could reduce the amount of waste produced (IIA17). • Policies that ensure the efficient use of land, sustainable use of resources, and seek opportunities to promote a circular economy (IIA18).
Uncertain (?)	24	<ul style="list-style-type: none"> • Policies that have potential to result in decreases, or increases in car reliance (IIA7). • Policies where development design are unclear and could result in a decrease or increase in biodiversity and natural capital (IIA9). • Policies where visual, setting impacts or disturbance will largely be determined by individual scheme location and design (IIA10). • Policies where the enhancements or negative effects will be determined by scheme level design and location close to heritage assets (IIA11). • Policies where the enhancements or negative effects will be determined by scheme level design and location from areas of high flood risk (IIA12).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Policies where water quality will be determined by the nature and quantity of freight and transport on water. • Policies where measures to reduce GHG emissions and promote renewable energy are unclear. These measures will be determined by scheme level design (IIA16). • Policies where the location and design are unclear and could be resource intensive and generate a significant amount of construction waste (IIA17). • Policies where the location and design are unclear and could result in land take (IIA18).

3.2 Assessment of Site Allocations

3.2.1 The assessment of proposed site allocations was carried out in relation to the IIA Objectives. A summary of the findings is detailed in **Table 3-3** and **Table 3-4** below. The full assessment of proposed site allocations can be found in **Appendix G** to the **main IIA** report.

Table 3-2 - Summary of Significant Effects – Site Allocations Assessment

Significance	Number of Significant Effects	Summary of Effects
Significant Positive (++)	126	<ul style="list-style-type: none"> • Sites that contribute to LBTH’s housing target, provide affordable and adaptable homes, and provide new community facilities (IIA1). • Sites that improve housing provision, opportunities, open spaces and healthcare facilities (IIA2). • Sites that are located close to existing town centres and include retail space (IIA3). • Sites that are located close to existing employment areas and provide employment space (IIA4). • Sites where over 500 homes are provided, contributing towards LBTH’s housing target, at least 35% affordable homes, and accessible homes provided (IIA5).

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Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites that deliver public realm improvements, increase natural surveillance, and include designing out crime principles (IIA6). • Sites that have good access to sustainable transport, high PTAL scores, and improve cycle and pedestrian access (IIA7). • Sites that have good access to transport, improve accessibility, permeability, and wayfinding (IIA8). • Sites that achieve biodiversity net gain through measures such as landscaping and green roofs (IIA9). • Sites that positively contribute to the townscape, provide open space enhancements, and public realm improvements (IIA10). • Sites located on previously developed land, support high-density housing and provide best use of land (IIA18).
Uncertain (?)	90	<ul style="list-style-type: none"> • Sites where housing provision, size, type and tenure is currently unknown (IIA1).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites where housing, healthcare and community space provisions provided are uncertain (IIA2). • Sites where the inclusion of retail space is currently unclear (IIA3). • Sites where it is unclear if employment space will be included within the development (IIA4). • Sites where housing provision, accessibility, size, type and tenure is unclear (IIA5). • Sites where it is unclear if designing out crime principles will be applied (IIA6). • Sites where it is unclear if additional sustainable transport will be included within development (IIA7). • Sites where it is unclear if construction will adversely affect habitats, or if 10% biodiversity net gain will be achieved (IIA9). • Sites where it is unclear if design will improve landscape and townscape settings (IIA10). • Sites that have potential to result in adverse effects on heritage assets, or improvements to the setting of heritage assets, but design details are unclear (IIA11).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites that are located within flood risk areas and it is unclear if mitigation measures will be included within development (IIA12). • Sites that are located close to water bodies but it is unclear if water quality mitigation measures will be included within development (IIA13). • Sites where climate resilience measures are currently unknown (IIA15). • Sites where it is unknown if development will include renewable energy sources or low carbon heat networks (IIA16). • Sites where it is unclear if existing buildings, structures and materials will be reused or recycled (IIA17). • Sites where the density of housing and use of sustainable materials is unknown (IIA18).
Significant Negative (- -)	13	<ul style="list-style-type: none"> • Sites that result in a loss of heritage assets (IIA11). • Sites that are located within flood zone 3 and a flood risk area, and no mitigation measures are outlined (IIA12). • Sites that have high climate risk and no climate resilience measures (IIA15).

3.3 Assessment of Alternatives

Assessment of Alternative Policies

- 3.3.1 The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the preferred plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 3.3.2 The development of the Local Plan policies has not at this stage identified any key policy alternatives, so the assessment of policy alternatives has assessed two scenarios – the continuation of the existing Local Plan and the application of the London Plan.
- 3.3.3 In general, the continuation of the existing Local Plan and London Plan Policies have resulted in less significant positive effects. However, the policies within each plan do remain relevant and the majority are fit for purpose.
- 3.3.4 The London Plan lacks specific borough details, that the local plan can provide, whilst some of the existing Local Plan policies are outdated, and no longer reflect key issues such as the Covid-19 recovery, rising costs of living and increases in crime against women and girls.

Assessment of Alternative Site Allocations

Table 3-3 - Overall impact of all Local Plan site alternatives against IIA Objectives

Significance	Number of Significant Effects	Summary of Effects
Significant Positive (++)	2	<ul style="list-style-type: none"> • Sites that are well connected to community and healthcare facilities and are likely to include additional facilities and open space (IIA2). • Sites that provide additional employment space and are well located close to existing employment opportunities (IIA4).
Uncertain (?)	127	<ul style="list-style-type: none"> • Sites where the provision of homes does not meet the borough’s housing target, the size, type, and tenure of homes is unknown (IIA1). • Sites where the additional provision of community facilities and healthcare facilities is unknown (IIA2). • Sites where it is uncertain if retail or business space will be included within development (IIA3).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites where it is uncertain if employment space will be provided within development (IIA4). • Sites where housing provision is unclear and fall below LBTH's housing target (IIA5). • Sites where it is unclear if designing out crime principles will be applied (IIA6). • Sites where it is unclear if sustainable transport access or improvements will be included within development (IIA7). • Sites where it is unclear if accessible provision to facilities and services will be included within development (IIA8). • Sites where it is unknown if greenspace will be included, or if 10% biodiversity net gain will be achieved (IIA9). • Sites where design details are unknown and it is uncertain if high quality sustainable design and public realm improvements will be achieved (IIA10). • Sites where it is not clear if sensitive design will be implemented (IIA11). • Sites where flood risk mitigation measures are unknown (IIA12).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> • Sites where water quality measures are unknown (IIA13). • Sites where climate resilience measures are unknown (IIA15). • Sites where it is unclear if renewable energy or low carbon heat networks will be used (IIA16). • Sites where it is unclear if structures, buildings and materials will be reused or recycled within development (IIA17). • Sites where it is unclear if sites will encourage sustainable use of materials (IIA18).
Significant Negative (- -)	17	<ul style="list-style-type: none"> • Sites with a low PTAL score (between 0 and 1b) and has no proposed improvements to public transport provision (IIA7). • Sites with a low PTAL score (between 0 and 1b) and has the potential to exclude social groups (IIA8). • Sites that have the potential to result in disturbance or loss of heritage assets (IIA11). • Sites located within flood zone 3 and flood risk areas with no mitigation outlined (IIA12).

Significance	Number of Significant Effects	Summary of Effects
		<ul style="list-style-type: none"> <li data-bbox="667 406 1881 494">• Sites that have high climate and heat risk and have no climate resilience measures outlined (IIA15).

3.4 Findings from other IIA Assessments

EqlA

- 3.4.1 Overall, the policies will likely result in positive impacts on protected characteristic group members in the borough. The policies aim to address a wide range of issues, identified by the key themes within the EqlA baseline.
- 3.4.2 The main protected characteristic groups that will particularly benefit include:
- **Age** – A range of ages groups will experience benefits as a result of the proposed policies. Older people who have reduced mobility, suffer from social isolation and loneliness and require access to health and other services will benefit through improved access to services as well as provision of supported living including care homes. Young people seeking education, training and accessible employment opportunities will also experience positive impacts. Young children are likely to benefit from air quality improvements that numerous policies look to achieve;
 - **Disability** – people with a variety of disabilities including mobility issues will benefit from a more accessible public realm, including open spaces, pedestrian routes and key services. The NLP includes policies which support inclusive design which will help to improve connectivity and function, benefiting users with mobility limitations. The NLP ensures that 10% of all new units are wheelchair accessible, improving access to housing; and
 - **Deprivation** – Policies are likely to benefit people from low-incomes who require improved access to employment, education and housing. Policies geared towards the provision of a wide range of employment opportunities at all levels as well as closing the skills gap through upskilling will be useful to low-income groups who are currently positioned as unable to access higher paid jobs. Additionally, the provision of affordable homes and supported living such as homeless shelters will be beneficial to this group. The ambition of the NLP to deliver an affordable housing target would make a positive impact on deprivation, reducing barriers for low-income families to housing and rental markets.
 - **Gender reassignment, sex and gender and race** - people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.

3.4.3 Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:

- **Age, Disability and Pregnancy and maternity** – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups; and
- **Deprivation** – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.

3.4.4 The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:

- Religion or belief;
- Sexual orientation; and
- Marriage and civil partnerships.

HIA

3.4.5 The HIA assessed the NLP policies and considered their impact on health. These have been detailed below:

- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Future policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads.
- **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, increasing road traffic noise in the area. Improvements to the night-time economy could also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction throughout the borough.

- **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for the Future theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation.
- **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the borough. Additional town centre developments is also likely to reduce unemployment in the borough.
- **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access to education and training.
- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces theme include safety measurements.
- **Access to services:** Positive health effects have been identified. Policies under the Community Infrastructure theme support development proposals to maximise opportunities for the provision of high-quality community facilities.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policies. Green infrastructure could be further promoted through additional requirements under the Homes for the Community theme.

- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

HRA

Stage 1 - HRA Screening (Regulation 18)

- 3.4.6 There are no Habitats sites within LBTH’s administrative area, however there are two Habitats that fall within the identified 7.2km Zone of Influence of the borough boundary and as such there will be implications for some of these Habitats sites from the policies of the Local Plan.
- 3.4.7 A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HFC1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 AA. These policies have potential for LSE on nearby Habitats sites relating to increased traffic (and therefore impacts on air quality) and increased public access, recreational and development pressures.
- 3.4.8 Given the possibility of LSE associated with the screened-in interventions, further, detailed assessment was considered necessary to satisfy the requirements of the Habitats Regulations as the Local Plan emerges.
- 3.4.9 It is also not possible to rule out in-combination LSE on Habitats sites as a result of policies in the emerging LBTH Local Plan when considered with other strategic plans based on the findings of the screening assessment and a review of the HRAs supporting Local Plans for adjacent authorities.

Stage 2 - Appropriate Assessment (Regulation 19)

- 3.4.10 At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 3.4.11 Policy BO2 was subject to further consultation with the LBTH and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 3.4.12 Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1, the evidence points towards no impact pathway which could give rise to any significant effects

- 3.4.13 Air quality considerations for Lee Valley Special Protection Area (SPA) and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway.
- 3.4.14 Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plans¹².
- 3.4.15 Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways.
- 3.4.16 Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access.
- 3.4.17 The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 3.4.18 For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified.

¹ Thames Water, Water Resource Management Plan, 2019 [online] available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-report/executive-summary.pdf>

² Thames Water, Revised Draft Water Resources Management Plan, 2024 [online] available at: <https://www.thameswater.co.uk/about-us/regulation/water-resources>

4 Cumulative Effects

- 4.1.1 A cumulative effects assessment was undertaken for the IIA. This looked at two different types of cumulative effects – Intra-project and Inter-project. These are defined as follows:
- Consideration of how different proposed policies and sites within the LBTH may interact and cause cumulative effects on a receptor (Intra-project effects); and
 - How the proposed policies and sites within the LBTH could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-Projects Effects)

4.2 Intra-Project Effects

- 4.2.1 The proposed policies and sites within the Local Plan resulted in the following intra-project cumulative effects. Further details on the assessment of the inter-project cumulative effects can be found within **Section 9.2** of the main **IIA Report**.
- 4.2.2 Positive effects have largely been identified for IIA objectives where policies contribute to improving the current status of the borough, for example, improving biodiversity enhancements, improving energy efficiency or providing additional community infrastructure. Positive effects were identified for biodiversity, greenhouse gases (GHGs), energy efficiency and sustainable resources, climate resilience, historic environment, landscape and townscape, air quality, efficient use of land, water quality, community needs, inclusivity and equality, health and wellbeing, sustainable transport, economy and employment, crime and safety, and housing.
- 4.2.3 Negative effects have been identified for biodiversity, historic environment, flooding, water quality, GHGs, and waste as a result of the scale of development required to meet the borough's housing targets and requirements for employment generation . There is the potential that multiple developments could result in a cumulative amount of construction waste and emissions of GHGs. Construction of these developments may occur in close proximity to heritage assets and conservation, or increase the risk of flooding due to the cumulative increase in hardstanding surfaces. Additionally, the loss of land required for sites and housing allocation may segregate and damage habitats, resulting in a loss of habitats.

4.2.4 Mixed positive and negative effects were identified for human health, biodiversity and natural capital, landscape and townscape, historic environment, flooding, water quality, air quality, climate change, greenhouse gases, waste, and efficient use of resources.

4.3 Inter-Project Effects

4.3.1 An assessment of the potential cumulative effects of the Local Plan in association with other plans, policies and projects in the surrounding area was completed, looking at the potential impacts at a strategic level. Further details on the assessment of the inter-project cumulative effects can be found within **Section 9.3** of the main **IIA Report**.

4.3.2 The following plans were considered:

- The London Plan, 2021;
- Crossrail 2;
- Liverpool Street Station Redevelopment
- 55 Bishopsgate
- One Exchange Square
- Mayor of London, Mayor’s Transport Strategy, 2018;
- Neighbouring Local Plans (detailed within **Section 9.3** of the main **IIA Report**); and
- Neighbouring Local Transport Plans, Strategies and Implementation plans (detailed within **Section 9.3** of the main **IIA Report**).

4.3.3 Potential positive effects were identified for population and equalities, human health, economy and employment, housing, crime and safety, transport, accessibility, air quality, and climate change.

4.3.4 Potential negative effects were identified for landscape and townscape, historic environment, air quality, and waste.

4.3.5 Potential mixed positive and negative effects were identified for population and equalities, human health, biodiversity and natural capital, landscape and townscape, historic environment, flooding, water quality, air quality, climate change, greenhouse gases, waste, and efficient use of resources.

5 Mitigation, Enhancements and Monitoring

5.1 Mitigation and Enhancement Measures

- 5.1.1 Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of IIA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan.
- 5.1.2 Proposed mitigation and enhancement measures have been set out in **Table 5-1** below.

Table 5-1 -Proposed Mitigation and Enhancement Measures

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA1 - Population and Equalities	Inclusive mobility guidance should be adhered to ensure designs are accessible for everyone.	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA
IIA1 - Population and Equalities IIA2 - Human Health	Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities.	Project level design and assessment
IIA1 - Population and Equalities IIA2 - Human Health	The loss of community facilities to make way for site allocations should be avoided. Where a loss can't be mitigated, these should be reprovioned elsewhere.	Project level design and assessment Community engagement
IIA1 - Population and Equalities	Employment should be focused on local residents in the first instance. Policies should aim to increase employment for all	Inclusion within preferred Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA4 – Employment and skills	protected groups where barriers to employment and education exist (low-incomes, younger people, disabled).	Council’s Strategic Plan 2022-2026
IIA1 - Population and Equalities IIA2 - Human Health IIA6 – Crime and Safety	Community safety, health and equalities should be considered in design, for example, pedestrian networks, including linking new developments into existing infrastructure, lighting and other safety design considerations, materials used (contrasting colours, non-slip surfaces), accessibility for all including those with reduced mobility or disability, well-being, affordability of schemes, active travel.	Project level Community Safety Assessment, EqIA and HIA
IIA1 - Population and Equalities IIA7 – Sustainable Transport IIA8 - Accessibility	Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles. Consideration should be made for removing other barriers towards active travel for disabled people and low income groups, such as affordability. The council should work with	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA Tower Hamlets Transport Strategy 2019-2041

IIA Objective	Mitigation/ Enhancement	Mechanism
	<p>charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p> <p>The Local Plan should also support community engagement with various groups prior the development of transport infrastructure.</p>	<p>The Mayor’s Transport Strategy</p>
<p>IIA1 - Population and Equalities</p> <p>IIA2 – Health and Wellbeing</p> <p>IIA6 – Crime and Safety</p>	<p>Where policies and site allocations make provision for open spaces and public realm improvements, there is a need for these spaces to be well designed and well lit, to ensure that they are safe and feel safe for all users, particularly after dark.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p>	<p>Inclusion within preferred Local Plan policies</p> <p>Project level design and assessment</p> <p>Community engagement</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	<p>Accessible surfacing should be considered for wheelchair users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p>	
<p>IIA1 - Population and Equalities</p> <p>IIA10 - Landscape and Townscape</p>	<p>Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs.</p>	<p>Project level design and assessment</p>
<p>IIA3 – Economy and Town Centres</p>	<p>Where sites are located within or in close proximity to local and neighbourhood shopping centres/ parades it is imperative that development does not detrimentally impact on the vitality of the designated centre.</p>	<p>Project level design and assessment</p> <p>Community engagement</p>
<p>IIA3 – Economy and Town Centres</p>	<p>The loss of businesses should be avoided. Where it cannot be avoided and businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified and/or adequate compensation is provided</p>	<p>Inclusion within preferred Local Plan policies</p> <p>Community engagement</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA4 – Employment and Skills	<p>particularly where businesses may need to be temporarily closed or relocated during construction.</p> <p>Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p>	Project level design and assessment
IIA4 – Employment and skills	Where new development comes forward in close proximity to existing shop frontages and businesses, there’s a need to ensure that they can remain open and maintain their existing business hours.	<p>Inclusion within preferred Local Plan policies</p> <p>Project level design and assessment</p>
IIA6 – Crime and Safety	<p>Development should incorporate designing out crime principles, particularly for those potential development sites located in areas with high levels of crime deprivation.</p> <p>Although crime is incorporated within the Local Plan, it currently doesn’t currently have its own standalone policy.</p> <p>Given the high levels of crime in some areas of the borough,</p>	<p>Incorporation within the Local Plan policies</p> <p>Project level design and assessment</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	reductions in crime could be better supported by planning policies.	
IIA9 – Biodiversity and Natural Capital	<p>Consideration needs to be given to the potential effects of construction of developments (noise, vibration and air pollution) on international, national and locally designated sites of importance for biodiversity.</p> <p>A Lighting Strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p>	<p>Project level design and assessment (including noise assessments/ surveys)</p> <p>Lighting Strategy</p>
IIA9 – Biodiversity and Natural Capital	For those sites that incorporate existing green space, Phase 1 habitat surveys should be undertaken to identify any habitats and species.	Project level assessment
IIA10 - Landscape and Townscape	Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.	<p>Scheme level design and planning application</p> <p>London View Management</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	<p>As outlined in the draft Tall Buildings SPD17 Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).</p>	
<p>IIA10 - Landscape and Townscape IIA11 - Historic Environment</p>	<p>New developments should seek to maximise sustainability benefits from existing landscape, townscape and heritage assets by valuing them inherently and for the wider services they provide.</p> <p>Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.</p>	<p>Historic Landscape Characterisation Project level landscape and visual impacts assessments Heritage Impact Assessments</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	<p>Development proposals in designated views should comply with London Plan Policy HC4.</p> <p>Promoters and designers should liaise closely with Tower Hamlets and Historic England to avoid or minimise negative effects, such as land take and light pollution, whilst seeking to maximise benefits, such as tranquillity.</p> <p>Where developments are being built and/or improved within, or 500m outside of a designated historic assets, visual effects assessment should be undertaken to determine magnitude of impact and possible mitigation.</p> <p>Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments.</p>	
<p>IIA10 - Landscape and Townscape</p>	<p>Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes.</p>	<p>Historic Landscape Characterisation</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA11 - Historic Environment		Project level landscape and visual impacts assessments
IIA11 – Historic Environment	<p>Characterisation work should be undertaken to understand the potential impact of site allocations on historic places, and places and inform assessments of an area’s capacity to accommodate development.</p> <p>Site specific studies, such as archaeological desk-based assessment and fieldwork, may also be necessary to provide adequate information.</p>	<p>Historic Landscape Characterisation</p> <p>Archaeological desk based assessment</p>
IIA14: Air Quality	A Dust Management Plan should be compiled prior to demolition and construction of new sites.	Project level Construction Environmental Management Plan (CEMP)

IIA Objective	Mitigation/ Enhancement	Mechanism
<p>IIA15 – Climate Change and Resilience</p> <p>IIA16 – GHG Emissions</p>	<p>Development should ensure design that is resilient to the current and future risks of climate change i.e. extreme heat, cold and precipitation.</p> <p>This could include the use of locally available, renewable, or reclaimed resources, as these are often more resilient. New developments should incorporate renewable energy generation methods, such as solar panels, to reduce the carbon emissions of the site.</p>	<p>Project level design and assessment</p>
<p>IIA12 – Flood Risk</p>	<p>Sequential testing should be undertaken, to avoid sites with the highest flood risk. Where this isn't viable and proposed sites are located within flood zones 2 or 3 a full flood risk assessment should be undertaken.</p> <p>Scheme level design should also consider the incorporation features to reduce flood risks, both now and in future, in light of future precipitation changes associated with climate change.</p> <p>This could include features such as sustainable urban drainage</p>	<p>Project specific transport plans/assessments</p> <p>Project active travel plans</p> <p>Incorporation within the Local Plan policies</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
	solutions (SuDs), permeable paving and natural engineering such as tree planting.	
IIA12 – Flooding	Flood Risk Assessments should be undertaken for all developments located in Flood Zone 2 or 3. The inclusion of SuDS should be implemented where developments are located in flood zones.	Project level design and assessment
IIA13 – Water Quality IIA18 – Waste	Vessels used to facilitate the movement of waste will need to adhere to the Maritime and Coastguard Agency Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations 2008 and other best practice to minimise pollution and effects on water quality.	Project specific waste management plans Reduce Resue Recycle Waste SPD
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions IIA17 – Waste	Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy and should consider BREEAM and BREEAM Infrastructure.	Project level design and assessment

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA18 – Efficient use of resource	Sustainable design and construction techniques should be promoted, such as low energy lighting and opportunities for renewable energy regeneration.	
IIA17 – Waste IIA18 – Efficient use of resource	Proposed sustainable transport infrastructure such as cycle lanes, bus lanes and footpaths, should where appropriate, prioritise the reallocation of the highway network.	Project level design and assessment Tower Hamlets Transport Strategy 2019-2041
IIA17 – Waste IIA18 – Efficient use of resource	A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).	Project level design and assessment – CEMP and OEMP

5.2 Monitoring Measures

5.2.1 The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of applying the plan can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.

5.2.2 The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the IIA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:

- IIA1 and IIA2: The effects of a growing population on community facilities and services;
- IIA5: The number of affordable and adaptable homes delivered;
- IIA9: The number of new developments achieving biodiversity net gain from January 2024;
- IIA10: The potential effects on key views;
- IIA12: Flood risk of new development monitored through the Strategic Flood Risk Assessment;
- IIA16: Levels of embodied carbon from new development; and
- IIA18: Levels of waste generations on new developments.

5.2.3 It should be noted that these uncertain effects are generally where limited scheme information is currently available.

5.2.4 **Table 5-2** below sets out those monitoring measures which could be suitable in monitoring those uncertain residual effects outlined above. Targets have either been taken from the Local Plan or the London Plan.

Table 5-2 - Proposed Monitoring Measures

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
<p>IIA1 and IIA2: The effects of a growing population on community facilities and services</p>	<p>The number of new healthcare and community services provided.</p> <p>Ratio of patient-to-staff numbers at GP practices</p>	<p>No targets included as part of the Local Plan or London Plan</p> <p>The Infrastructure Delivery Plan may include targets. This will be delivered alongside the Local Plan.</p>
<p>IIA5: The number of affordable and adaptable housing provided</p>	<p>The number/ percentage of affordable homes being delivered within the borough.</p> <p>The number/ percentage of adaptable homes or specialist accommodation being delivered within the borough.</p>	<p>Policy HF2 of the Local Plan:</p> <ul style="list-style-type: none"> ■ Deliver a minimum of 40% affordable housing (by habitable room) on-site when seeking to provide 10 or more new residential units; ■ Deliver a minimum of 50% affordable housing (by habitable room) on-site through the redevelopment of affordable housing, estate regeneration schemes and industrial land for residential use; and ■ Deliver the required amount of affordable homes in accordance with a 85% social homes and 15% intermediate homes tenure split.

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
		Policy D7 of the London Plan: Delivery of at least 10% of dwellings meet Building Regulation requirement M4(3) ³ 'wheelchair user dwellings'
IIA9: The number of new developments achieving biodiversity net gain	The number of new developments achieving biodiversity net gain	Policy BO4 of the Local Plan: To deliver a minimum 2.5 biodiversity unit per hectare increase or 30% gain (whichever is higher) in habitat value for wildlife compared with the pre-development baseline
IIA10: The potential effects on key views	Number of tall building applications granted planning permission	No targets included as part of the Local Plan or London Plan

³ HM Government, The Building Regulations, Access to and Use of Buildings (M), 2011 [online] available at: https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
IIA11: Potential negative effects from new developments on heritage assets	Number of buildings on the 'At Risk Register'. Number of applications granted planning permission contrary to advice from Historic England.	No targets included as part of the Local Plan or London Plan
IIA12: Flood Risk	Number of Environment Agency objections to planning applications.	No targets included as part of the Local Plan or London Plan
IIA16: Levels of embodied carbon from new development.	The number of development proposals that meet London's Energy Transformation Initiative (LETI) 2020 best practice embodied carbon emission targets	Policy CG4 of the Local Plan: <ul style="list-style-type: none"> ■ Domestic buildings should achieve embodied carbon limits of 500kg CO2/m2 or less; and ■ Non-domestic buildings should achieve embodied carbon limits of 600kg CO2/m2 or less.

Potential Effects	Key Performance Indicators	Targets (as set out in the Local Plan or London Plan)
<p>IIA18: Uncertain effects of waste generations on new developments</p>	<p>The amount of construction and demolition waste going to landfill</p> <p>The number of new developments which incorporate waste saving initiatives</p> <p>Household and commercial waste and recycling figures for the borough</p>	<p>As per Policy SI7 of the London Plan:</p> <ul style="list-style-type: none"> ■ Zero biodegradable or recyclable waste to landfill by 2026 ■ Meet or exceed the municipal waste recycling target of 65% by 2030 ■ Meet or exceed the targets for each of the following waste and material streams: <ul style="list-style-type: none"> • a) construction and demolition – 95% reuse/ recycling/ recovery • b) excavation of material – 95% beneficial use

6 Next Steps

- 6.1.1 LBTH is seeking the views of statutory bodies, the public and other stakeholders on the results of the IIA. Consultation at this stage continues to ensure that the IIA provides a robust assessment of the Local Plan.
- 6.1.2 This IIA Interim Report will be issued to consultees for consultation alongside the preferred Local Plan (Regulation 19 Consultation) in summer 2024.
- 6.1.3 An indicative timetable of the remaining stages of the IIA and Local Plan have been included in **Table 6-1** below.

Table 6-1 – Indicative Local Plan and IIA Timetable

IIA/ Local Plan Stages	Timescales
SA Report (IIA Stage C)	Spring/Summer 2024
Regulation 19 Consultation (IIA Stage D)	Summer 2024
Examination (IIA Stage D)	Early 2025
IIA Post Adoption Statement (Stage E)	Autumn/Winter 2025



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Tower Hamlets Borough Council

New Local Plan

Integrated Impact Assessment Report



Tower Hamlets Borough Council

New Local Plan

Integrated Impact Assessment Report

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Quality control

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
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Prepared by	Emily Astins Charlotte Town	Emily Astins Charlotte Town	Charlotte Town Jasmine Humphrey	
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Project number	70103752			

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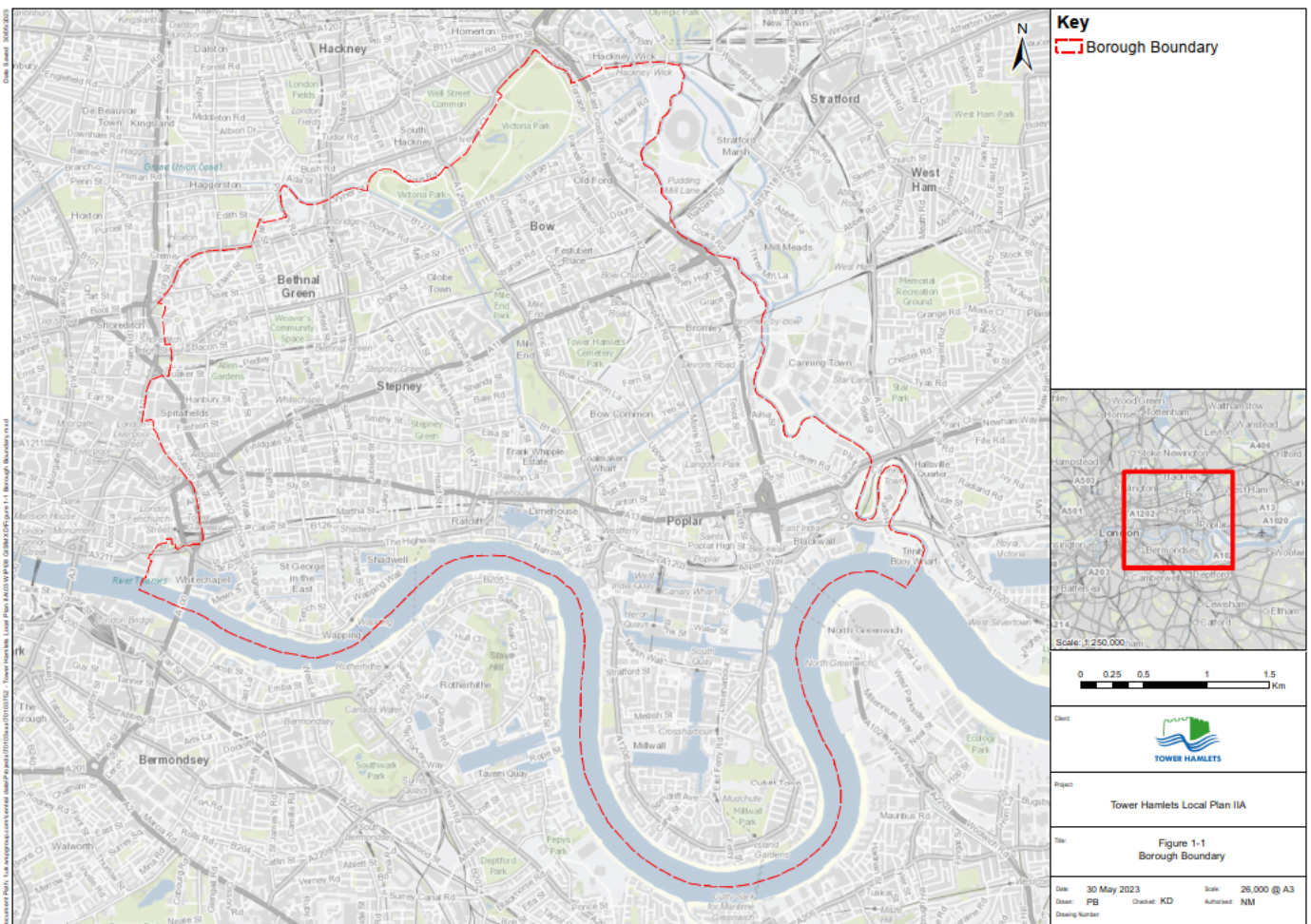
Health Impact Assessment

1 Introduction

1.1 Overview

- 1.1.1. The London Borough of Tower Hamlets (here in referred to as LBTH) is in the process of preparing a new Local Plan for the borough. The new Local Plan will set out how development will be planned and managed across the borough through to 2038.
- 1.1.2. It will set out how the borough can sustainably develop, identifying the number of new homes, jobs and facilities needed to support the growing and changing population, as well as protecting all the features that the borough’s communities cherish, such as town centres, parks and open spaces, waterways, cultural and historic buildings.
- 1.1.3. The borough boundary and the spatial extent of the new Local Plan is set out in **Figure 1-1** below.

Figure 1-1 - LBTH Borough Boundary



1.2 Local Plans

- 1.2.1. Section 3 of the National Planning Policy Framework (NPPF)¹ requires that each local planning authority should prepare a local plan for its area, which guides decisions on future development proposals and addresses the needs and opportunities of the area.
- 1.2.2. Topics that local plans usually cover include housing, employment and shops and they also identify where development should take place and areas where development should be restricted. Once in place, local plans become part of the statutory development plan, which is the starting point for determining local planning applications.
- 1.2.3. Paragraph 15 of the NPPF states that the *'planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities'*.
- 1.2.4. Part 2 of the Town and Country Planning Regulations 2012 makes provision in relation to the local plan and supplementary planning documents. Parts 4 and 5 of these regulations prescribe the form and content of local plans and supplementary planning documents (to be prepared by local planning authorities) and prescribes which documents are to be local plans.
- 1.2.5. The Local Plan must also be in 'general conformity' with the London Plan, and where appropriate, take account of Supplementary Planning Guidance (SPG). The Mayor of London produces other strategies to sit alongside the London Plan².

1.3 Purpose of this Report

- 1.3.1. LBTH has commissioned WSP to undertake an Integrated Impact Assessment (IIA) which will ensure that sustainability aspects are incorporated into their Local Plan. The IIA combines the following assessment processes:
 - Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment - SEA);
 - Equalities Impact Assessment (EqIA);
 - Health Impact Assessment (HIA); and
 - Habitats Regulations Assessment (HRA).
- 1.3.2. An integrated assessment approach enables synergies and cross-cutting impacts to be identified, avoiding the need to undertake and report on separate assessments and seeking to reduce any duplication of assessment work. A single process can improve efficiencies in

¹ Ministry of Housing, Communities and Local Government Framework, National Planning Policy Framework, 2021 [online] available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² Mayor of London, The London Plan, 2021 [online] available at: <https://www.london.gov.uk/programmes-strategies/planning/london-plan>

the assessment itself, as many of the issues covered in the different forms of assessment overlap. This process also helps to simplify outcomes and recommendations for policymakers.

1.3.3. More detail on the IIA methodology is provided in **Section 3**.

1.3.4. This report sets out the second stage of the IIA/ local planning process, which is the assessment of the preferred Local Plan and preparation of the IIA Report (IIA Stage C). This stage includes the following:

- Assessment of preferred policies, objectives and spatial options;
- Assessment of reasonable alternatives;
- Assessment of cumulative effects;
- Outlining mitigation and enhancement measures;
- Outlining recommendations; and
- Setting out next steps.

2 The New Local Plan

2.1 Background

- 2.1.1. The new Local Plan will set out the vision for the future of the borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of the environment, green spaces and cultural and historic assets.
- 2.1.2. Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the borough will develop through to 2038.

2.2 Work to Date

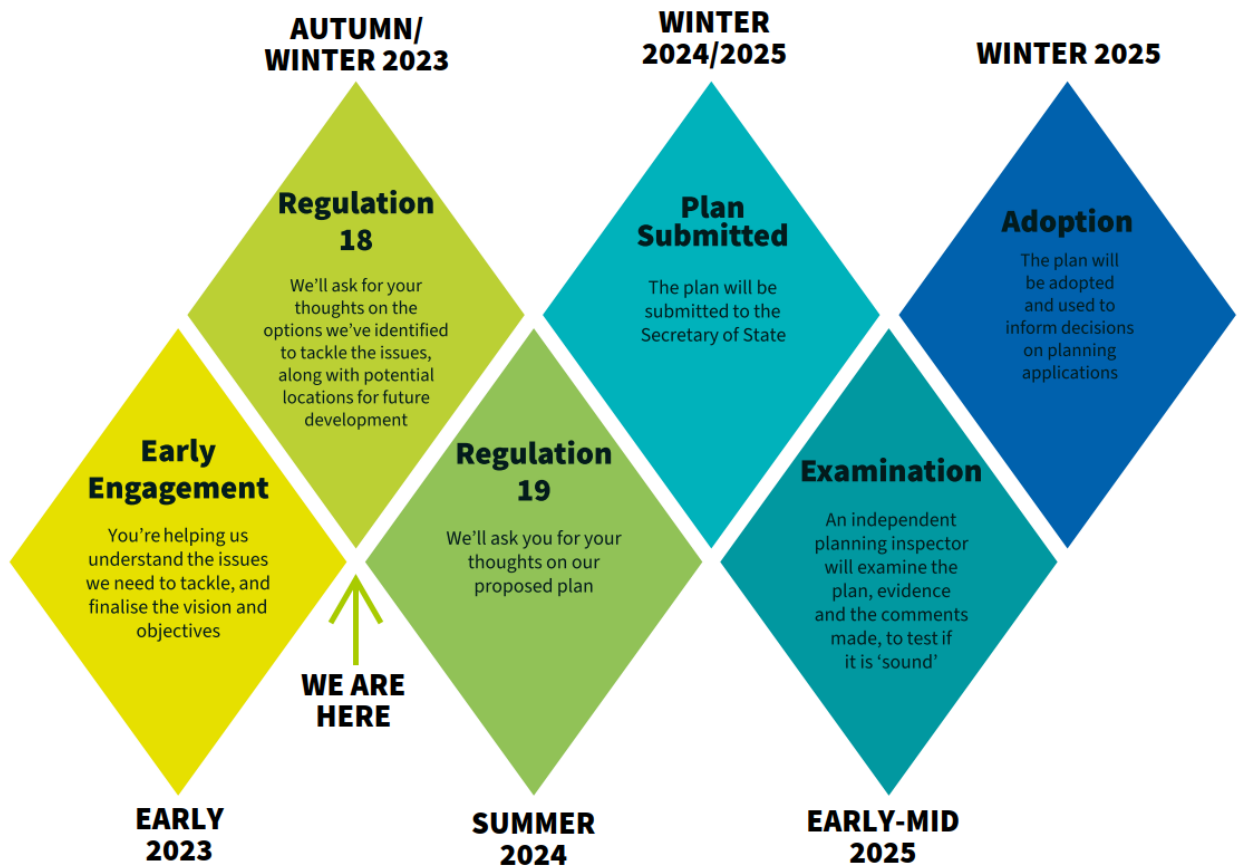
- 2.2.1. Work on the new Local Plan started in early 2022. Public consultation has already taken place to develop LBTH's new Local Plan.
- 2.2.2. Early engagement took place from Wednesday 25th January 2023 to Wednesday 8th March 2023 through the Early Engagement Platform, to seek the views of LBTH's varied communities and stakeholders about the future of the borough and what the local plan should contain. This was an important stage to ensure the local plan is shaped by early and effective engagement with a wide range of groups.
- 2.2.3. The public also had the option of attending one of the three online webinar sessions, an in-person public engagement session, in-person or virtual drop-in sessions, or by providing written comments by email and/or post. This early engagement is the start of the discussion which will support the production of the new Local Plan. The public's input is a valuable part of the preparation process and will inform the development of new policies.
- 2.2.4. Feedback from both public consultations has been used to shape this draft new Local Plan. It sets out a shared vision for the future of the borough and includes the proposed strategy and planning policies that will help guide and manage development in the area over the new Local Plan period (2023 to 2038).
- 2.2.5. The IIA Scoping Report was undertaken in April 2023, which set out the baseline and identified key issues and opportunities for the borough and the Local Plan. This underwent a separate consultation with the statutory consultees (Environment Agency, Historic England and Natural England) in which feedback was received on both the IIA process and the Local Plan.
- 2.2.6. LBTH consulted on the first draft version of the local plan, which was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning)

(England) Regulations 2012³, and ran between the 6th of November and the 18th of December 2023. An Interim Integrated Impact Assessment was undertaken in support of this and was consulted on alongside the first draft version of the local plan.

2.2.7. Since consultation, the Local Plan has been revised and refined and this Report represents the assessment of the updated Preferred Local Plan for Regulation 19 consultation.

The indicative timeline for delivery of the Local Plan is shown in **Figure 2-1** below.

Figure 2-1 - Local Plan Timeline



³ UK Government, The Town and Country Planning (Local Planning) (England) Regulations 2012, [online] available at: https://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi_20120767_en.pdf

2.3 Local Plan Vision and Objectives

2.3.1. The proposed vision for LBTH is set out in **Box 2.1** below.

Box 2-1 – Local Plan Vision

Our Proposed Vision for Tower Hamlets

Our vision for Tower Hamlets is to build a brighter future, to empower the next generation, and to promote a multicultural and diverse community that thrives within mixed, cohesive, and inclusive neighbourhoods. The council will prioritise inclusivity for people of all ethnicities, faiths, genders and sexual orientation, walks of life, designing our places to ensure that people are put first within the highest quality environments that meet the needs and ambitions of all our communities.

The council will strive to address overcrowding in the borough and meet the range of housing needs of our community by delivering a significant amount of high-quality new homes. The issues caused by overcrowding including poorer health and educational outcomes, increased impacts on mental health and greater incidences of depression and anxiety will be mitigated with the focus on an increased capacity for housing. We will consider a mix of housing products, types, tenures, layout, and size to best match the borough's population, with a focus on affordable and social housing, particularly family homes that can meet the needs of our overcrowded residents. We will seek to focus on the delivery of affordable and social housing through a 40% target on development sites to tackle the overcrowding and housing crisis.

Tower Hamlets will work towards a clean and green future where carbon emissions and overall energy usage are reduced. We will prioritise the reuse and adaptation of buildings and where not feasible, the recycling of building materials. We will support walking and cycling links alongside the use of, and improvements to, the public transport network. The transport needs of all residents will be considered as part of future development opportunities, particularly where this supports mobility needs or for the purposes of employment. The borough's network of green and blue spaces, including Victoria Park, Mile End Park, Mudchute Park, the Thames, River Lea, Dock Basins, and canals, will provide opportunities for leisure, relaxation, and entertainment with a variety of uses encouraged to support health and well-being while still ensuring their enjoyment and function as open spaces is retained.

The borough, having regained the planning powers for parts of Bromley-by-Bow, Fish Island, and Hackney Wick from the London Legacy Development Corporation (LLDC)⁴, will continue to integrate and grow the distinctive opportunities these areas offer.

⁴ The LLDC came into being on April 1, 2012. From October 1 2012 the LLDC became the Local Planning Authority for the Olympic Park and surrounding neighbourhoods, which includes Bromley-by-Bow and Fish Island. The LLDC functions and responsibilities include those related to plan making and decision making.

The borough's small businesses, start-ups, and markets including Whitechapel Market, Petticoat Lane Market, Bethnal Green Markets, Roman Road Market, Columbia Road Market, Watney Market, Crisp Street Market, Brick Lane Market, and other local traders will be prioritised and at the heart of decision-making. The key employment areas of Canary Wharf, Whitechapel, and the City Fringe will continue to evolve into dynamic centres of innovation and global hubs for the financial, technology, professional, life-sciences, biotech, and digital sectors. The continued benefits of the Elizabeth line arrival will further unlock the unique opportunities available within the borough. A community wealth building approach will be adopted, alongside the provision of genuinely affordable workspace will be prioritised for local small businesses, local start-ups, makers, the creative industries, and emerging and thriving small and medium-sized enterprises.

We will identify and coordinate the provision of infrastructure necessary to support our growing population, including promoting the delivery of new parks, public transport improvements, educational, health, community, cultural, and recreational facilities across the borough.

Our unique town centres, markets, historical, and cultural attractions will be revitalised to support local communities and become some of London's top attractions. With the borough's growing population, young people will be at the forefront of anticipated regeneration with jobs, homes, spaces, and environments geared towards their success.

Exceptional design and architectural innovation will be ensured across the borough to ensure our distinct buildings, skylines, and streetscapes provide a high-quality environment for our residents and remain a recognisable feature of London. We will celebrate the vibrant history and urban landscape of Tower Hamlets through thoughtful design and placemaking, highlighting our rich, historic, and significant character areas. Tower Hamlets will emerge from the economic impacts of the COVID-19 pandemic and Brexit to maintain its status as an international hub for business, culture, and tourism. Our unique location, with strong links to the City of London, Stratford, London City Airport, and beyond, will allow for a rich mix of strategic functions that benefit the community.

By 2038, Tower Hamlets will have made significant strides in addressing overcrowding, delivered thousands of new homes to support the community, provided opportunity for markets and small local businesses to thrive, and improved the overall health and safety of residents. The borough will have continued to play a role in supporting London's growth and economy through sustainable development. The borough's strong and inclusive communities will be thriving within healthy environments, ensuring a brighter future for all.

2.3.2. The Local Plan’s strategic objectives provide a link to the delivery of the vision for Tower Hamlets. These objectives address the key challenges of the borough over the 15-year plan period. The objectives have been informed by and reflect many of the key documents prepared by the council, including the Strategic Plan (2022-2026)⁵. These objectives are as follows:

- Empowering our communities culturally, economically, and politically
- Tackling overcrowding and housing in our borough
- Supporting young people and accelerating education
- A thriving local and global economy that boosts jobs, skills, businesses and tackles inequalities
- Securing infrastructure delivery to protect and strengthen public services
- A clean and green future
- Healthy, safe and inclusive neighbourhoods

2.4 Local Plan Policies

2.4.1. In total the draft Local Plan puts forward 72 policies across 10 themes. These themes and policies have been outlined in **Table 2-1** below. Strategic policies have been denoted by an asterisk. These are the policies which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004⁶.

Table 2-1 – Proposed Draft Local Plan Policies

Draft Local Plan Policies
<i>Delivering the Local Plan</i>
DV1 - Areas of growth and opportunity within Tower Hamlets
DV2 - Delivering sustainable growth in Tower Hamlets
DV3 – Healthy Environments
DV4 - Planning and construction of new development

⁵ The Strategic Plan is the council’s main plan. It sets out the most important priorities for the council between 2022 and 2026. These priorities are translated from the Mayor’s vision and the administration’s manifesto. All local authorities must deliver certain services and make decisions: these are set out in law. The plan also includes important actions that the council will take to make sure these services and decisions are the best they can be.

⁶ UK Government, Planning and Compulsory Purchase Act 2004 [online] available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents>

Draft Local Plan Policies
DV5 - Developer contributions
DV6 – Social value
DV7 – Utilities and digital connectivity
DV8 – Site allocations
<i>Homes for the Community</i>
HF1 – Meeting housing needs
HF2 – Affordable housing and housing mix
HF3 – Protection of existing housing
HF4 – Support and specialist housing
HF5 – Gypsy and traveller accommodation
HF6 – Purpose-built student accommodation
HF7 – Large-scale purpose-built shared living
HF8 – Housing with shared facilities (houses in multiple occupation)
HF9 – Housing Standards and Quality
<i>Clean and Green Future</i>
CG1 – Mitigating and adapting to a changing climate
CG2 – Low energy buildings
CG3 – Low carbon energy and heating
CG4 – Embodied carbon, retrofit and the circular economy

Draft Local Plan Policies
CG5 – Overheating
CG6 – Managing flood risk
CG7 – Sustainable drainage
CG8 – Water efficient design
CG9 – Air quality
CG10 – Noise and vibration
CG11 – Contaminated land
<i>People Places and Spaces</i>
PS1 – Design and infrastructure-led approach to development
PS2 – Tall Buildings
PS3 – Securing design quality
PS4 – Attractive streets, spaces and public realm
PS5 – Creating inclusive spaces
PS6 – Heritage and the historic environment
PS7 – World heritage sites
PS8 – Shaping and managing views
PS9 – Shopfronts
PS10 – Advertisements, hoardings and signage
PS11 – Siting and design of telecommunications infrastructure

Draft Local Plan Policies
<i>Inclusive Economy and Good Growth</i>
EG1 – Creating investment and jobs
EG2 – New employment space
EG3 – Affordable workspace
EG4 – Loss and redevelopment of employment space
EG5 – Railway Arches
EG6 – Data Centres
<i>Town Centres</i>
TC1 – Supporting the network and hierarchy of centres
TC2 – Protecting the diversity, vitality and viability of town centres
TC3 – Town centre uses outside centres
TC4 - Markets
TC5 – Food and drink
TC6 – Entertainment uses
TC7 – Evening and night-time economy
TC8 – Short-stay accommodation
<i>Community Infrastructure</i>
CI1 – Support community facilities
CI2 – Existing community facilities

Draft Local Plan Policies
CI3 – New and enhanced community facilities
CI4 – Public houses
CI5 – Arts and Culture facilities
<i>Biodiversity and open space</i>
BO1 – Green and blue infrastructure
BO2 – Open spaces and the Green Grid networks
BO3 – Water spaces
BO4 – Biodiversity and access to nature
BO5 – Urban greening
BO6 – Play and recreation spaces
BO7 – Food growing
<i>Movement and Connectivity</i>
MC1 – Sustainable travel
MC2 – Active travel and healthy streets
MC3 – Impacts on the transport network
MC4 – Parking and permit-free
MC5 – Sustainable delivery, servicing and construction
<i>Reuse, Recycling and Waste</i>
RW1 – Managing our waste

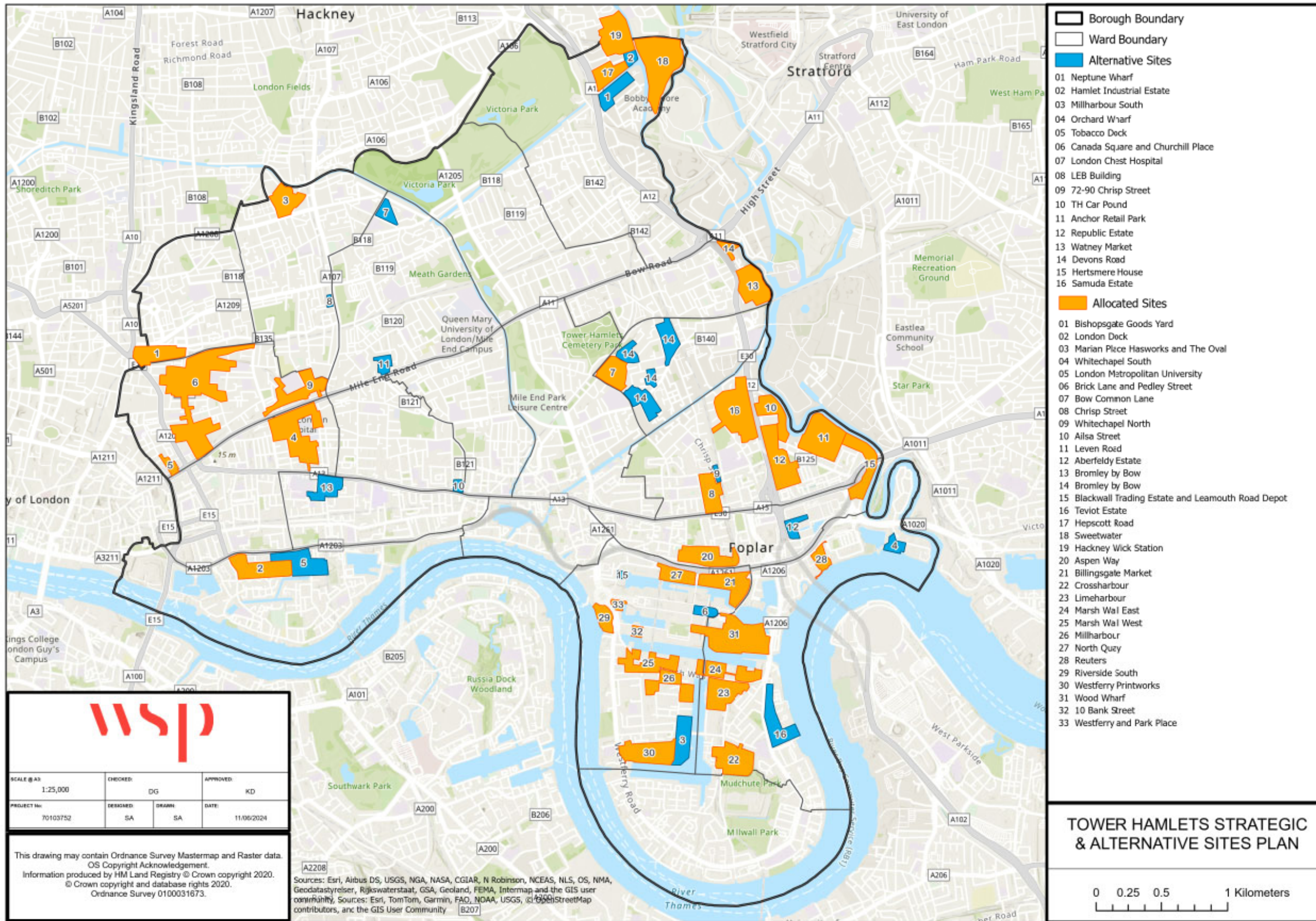
Draft Local Plan Policies
RW2 – New and enhanced waste facilities
RW3 – Waste collection facilities in new development

2.5 Local Plan Site Allocations and Alternatives

- 2.5.1. A key part of the local planning process is to identify key sites for development. The Local Plan proposes 32 site allocations, which are set out in **Figure 2-2** overleaf.
- 2.5.2. All proposed development sites underwent an initial sifting process by LBTH which identified potential key constraints as well as its ability to achieve a minimum of 500 new homes. Sites include those that have been previously allocated as part of the existing local plan and the LLDC Local Plan⁷ as well as those that have come forward since the adoption of these plans.
- 2.5.3. It should be noted that some of the proposed site allocations may be subject to further viability testing, but it is assumed that they will be able to achieve a minimum of 500 new homes.
- 2.5.4. As part of the SEA Regulations, reasonable alternatives need to be considered. The proposed site alternatives include those sites that are developable but do not meet the 500 minimum capacity targets of the proposed site allocations. There are 16 sites in total. These sites have the potential to come forward as windfall sites in the future if the proposed site allocations above do not provide adequate housing numbers.

⁷ LLDC Local Plan 2020-2036 [online] available at: <https://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/local-plan-2020-2036>

Figure 2-2 - Proposed Site Allocations and Alternatives



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3 Methodology

3.1 Introduction

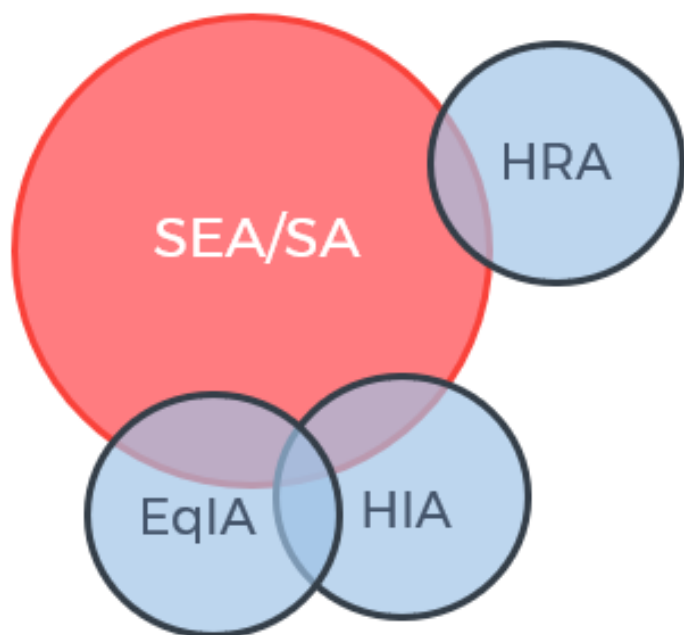
3.1.1. Sustainability Appraisal is a systematic process that is undertaken during the preparation of a plan. Its role is to promote sustainable development by assessing environmental, social and economic impacts, as well as mitigating any potential adverse effects that the plan might otherwise have.

3.1.2. The IIA combines the following assessment processes:

- Strategic Environmental Assessment (SEA);
- Sustainability Appraisal (SA);
- Health Impact Assessment (HIA);
- Equalities Impact Assessment (EqIA); and
- Habitats Regulations Assessment (HRA).

3.1.3. **Figure 3-1** below shows the relationship of each of these IIA elements.

Figure 3-1 - Relationship of IIA Elements



3.2 Sustainability Appraisal

- 3.2.1. The SEA/SA process is carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which emerging plans will help to achieve relevant environmental, economic and social objectives.
- 3.2.2. SEA is used to describe the application of environmental assessment to plans and programmes in accordance with the ‘Environmental Assessment of Plans and Programmes Regulations’ (SI 2004/1633, known as the SEA Regulations)⁸.
- 3.2.3. SEA is mandatory for plans and programmes which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste or water management, telecommunications, tourism, town and country planning or land use, and which set the framework for future development consent of projects listed in the Town and Country Planning (Environmental Impact Assessment) Regulations⁹.
- 3.2.4. SEA only considers the environmental effects of a plan whilst SA also considers a plan’s wider economic and social effects. It is obligatory that SAs meet all of the requirements of the SEA Regulations.
- 3.2.5. The approach adopted for the SA element of the Local Plan follows that set out in the Practical Guide to SEA¹⁰ and the Planning Practice Guidance to SEA¹¹. SAs do however need to meet all of the requirements of the SEA Regulations, so a separate strategic environmental assessment should not be required.

3.3 Equalities Impact Assessment

- 3.3.1. The Equality Act 2010¹² includes a public-sector equality duty that requires public organisations and those delivering public functions to: *‘show due regard to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity; and foster good relations between communities’*.
- 3.3.2. The EqIA process focuses on assessing and recording the likely equalities effects as a result of a policy, project or plan. It seeks to ensure that the policy, project or plan does not discriminate or disadvantage people and enables consideration of how equality can be

⁸ SI 2004 No. 1633, The Environmental Assessment of Plans and Programmes Regulations 2004 [online] Available at: http://www.legislation.gov.uk/ukksi/2004/1633/pdfs/ukxi_20041633_en.pdf

⁹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [online] Available at: <http://www.legislation.gov.uk/ukksi/2017/571/introduction/made>

¹⁰ Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive. available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

¹¹ Department for Communities and Local Government (2015) Strategic environmental assessment and sustainability appraisal. Available at: <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

¹² Equality Act, 2010, [online] available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents>

improved or promoted. The Equality Duty came into force in April 2011 and covers the following nine Personal Protected Characteristics:

- Age;
- Disability;
- Gender;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief; and
- Sexual orientation.

3.4 Health Impact Assessment

- 3.4.1. HIA is a process to identify the likely health effects of plans, policies or developments and to implement measures to avoid negative impacts and promote opportunities to maximise the benefits. There is no formally adopted methodology for HIA although there is a body of practice and guidance at a policy level. Assessment of health can be undertaken as a discrete process within an HIA and can also be embedded within environmental assessments.
- 3.4.2. HIA is not a statutory requirement of the Local Plan preparation process. However, Planning Practice Guidance¹³ states that ‘Local planning authorities should ensure that health and wellbeing and health infrastructure are considered in local and neighbourhood plans and in planning decision making’.
- 3.4.3. HIAs can be done at any stage in the development process but are best done at the earliest stage possible.

3.5 Habitat Regulations Assessment

- 3.5.1. Under Article 6(3) of the European Union Habitats Directive¹⁴ as transposed into the UK law by the Habitats Regulations¹⁵, an assessment (referred to as an HRA) needs to be undertaken in respect of any plan or project which:

¹³ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, Planning Practice Guidance, Healthy and Safe Communities, 2014 [online] available at: <https://www.gov.uk/guidance/health-and-wellbeing>

¹⁴ European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, 1992 [online] available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01992L0043-20130701>

¹⁵ The Conservation of Habitats and Species Regulations 2017, [online] Available at: <http://www.legislation.gov.uk/ukxi/2017/1012/contents/made>

- 3.5.2. “Either alone or in combination with other plans or projects would be likely to have a significant effect on a site designated within the Natura 2000 network – these are Special Areas of Conservation (SACs), candidate SACs (cSACs), and Special Protection Areas (SPAs). In addition, Ramsar sites (wetlands of international importance), potential SPAs (pSPA) and in England possible SACs (pSACs), are considered in this process as a matter of law or UK Government policy. These sites are collectively termed ‘European sites’ in Habitats Regulations Assessment (HRA); and is not directly connected with, or necessary to, the management of the site”.
- 3.5.3. Guidance on the Habitats Directive sets out four distinct stages for assessment under the Directive:
- Stage 1: Screening: the process which initially identifies the likely impacts upon a Natura 2000 site of a plan or project, either alone or in combination with other plans or projects, and considers whether these impacts are likely to be significant (undertaken at Regulation 18);
 - Stage 2: Appropriate Assessment: the detailed consideration of the impact on the integrity of the Natura 2000 sites of the plan or project, either alone or in combination with other plans or projects, with respect to the site’s conservation objectives and its structure and function. This is to determine whether there will be adverse effects on the integrity of the site (undertaken at this stage - Regulation 19);
 - Stage 3: Assessment of alternative solutions: the process which examines alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the Natura 2000 site ; and
 - Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain: an assessment of whether the development is necessary for imperative reasons of overriding public interest (IROPI) and, if so, of the compensatory measures needed to maintain the overall coherence of the Natura 2000 network.
- 3.5.4. The first stage of the HRA (screening) was undertaken alongside the IIA Interim Report, to support Regulation 18 consultation. As the screening was unable to rule out LSE, Stage 2 (Appropriate Assessment) has been undertaken to support Regulation 19. This IIA Report outlines the key findings from this assessment.
- 3.5.5. The HRA is driven by separate legislation to the SEA/SA and other forms of assessment. This means the HRA Report will be published separately to the IIA Report and not included as an appendix to the IIA Report.

3.6 IIA Process and Requirements

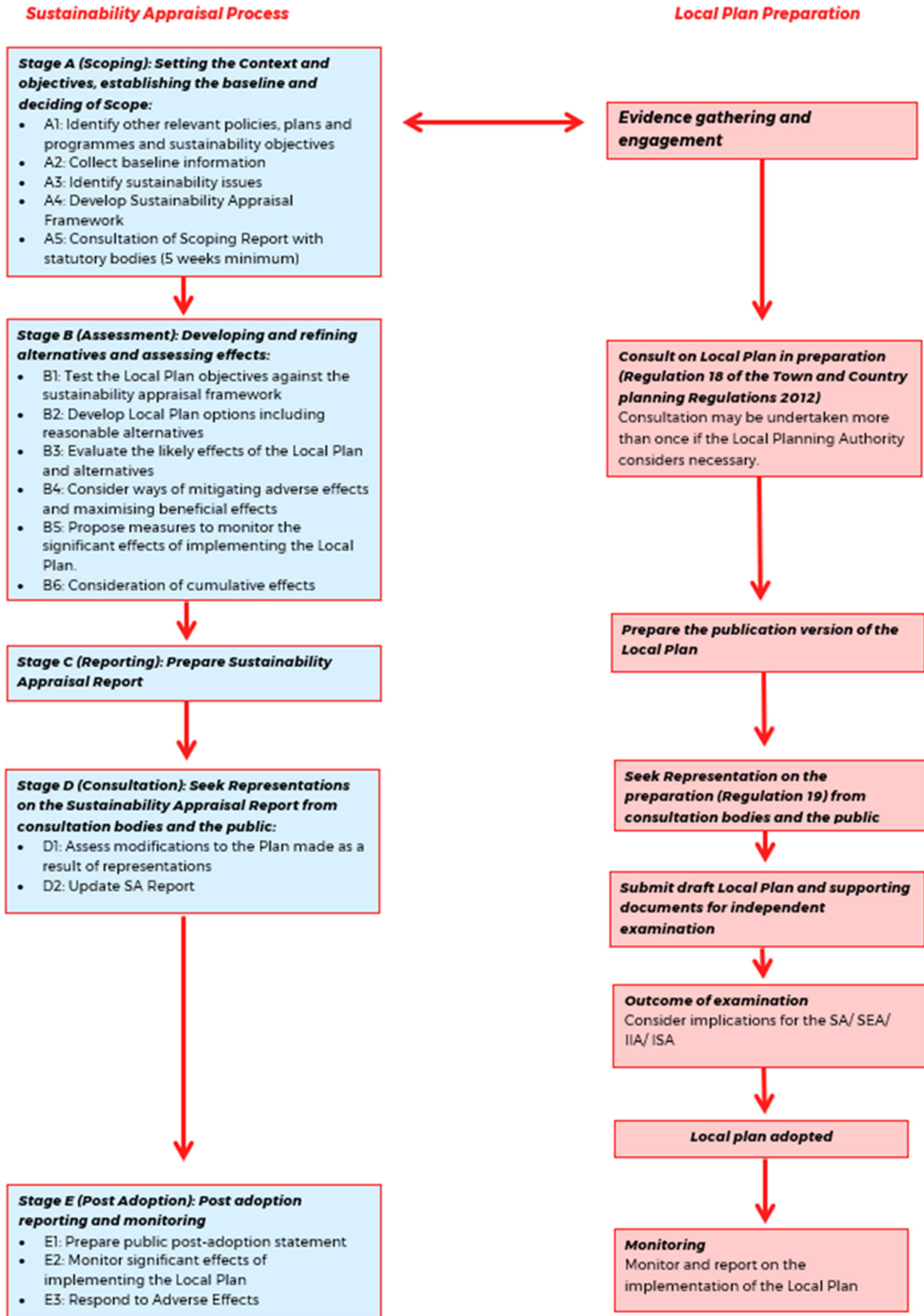
- 3.6.1. **Table 3-1** below sets out the IIA process. The integration of the IIA with the Local Plan process is shown in **Figure 3-1**. This Report represents Stage 2 of the Local Plan and IIA Stage B. **Appendix A** sets out more specifically how the IIA has met the requirements of the SEA Regulations.

Table 3-1 – IIA Stages

Local Plan Stage	IIA Stage and Tasks
<p>Stage 1: Evidence Gathering and Engagement</p>	<p>Stage A: <i>Setting the context and objectives, establishing the baseline and deciding on the scope – Completed in 2023</i></p> <p>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives</p> <p>A2: Collecting baseline information</p> <p>A3: Identifying sustainability issues and problems</p> <p>A4: Developing the IIA assessment framework</p> <p>A5: Consulting on the scope of the IIA</p>
<p>Stage 2: Draft Plan Preparation and Regulation 18 Consultation</p>	<p>Stage B: <i>Developing and refining options/alternatives and assessing effects</i></p> <p>B1: Testing the draft plan objectives against the IIA assessment framework</p> <p>B2: Developing the draft Local Plan options and preparing an IIA Report (this report)</p> <p>B3: Predicting the effects of the draft Local Plan and its alternatives</p> <p>B4: Evaluating the effects of the draft Local Plan and its alternatives</p> <p>B5: HIA and EqIA assessments</p> <p>B6: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>B7: Proposing measures to monitor significant effects of implementing local plans</p> <p>B8: Consultation of Interim IIA Report to accompany the Regulation 18 consultation</p>
<p>Stage 3: Preparation of the publication version of the Plan</p>	<p>Stage C: <i>Prepare the Integrated Sustainability Appraisal Report – This Report</i></p> <p>C1: Testing the final objectives against the IIA framework</p> <p>C2: Predicting the effects of the final Local Plan and its alternatives</p> <p>C4: Evaluating the effects of the final Local Plan and its alternatives</p> <p>C5: Updated HIA and EqIA assessments</p> <p>C6: Development of mitigation and enhancement measures</p> <p>C7: Further development of monitoring measures</p> <p>C8: Consultation of IIA Report to accompany the Regulation 19 consultation</p>

Local Plan Stage	IIA Stage and Tasks
<p>Stage 4: Seek representation on the publication Plan (Regulation 19) from consultation bodies and the public</p>	<p><i>Stage D: Consulting on the preferred options of the Local Plan and IIA Report – This stage</i></p> <p>D1: Public participation on the preferred options of the Local Plan and the IIA Report</p> <p>D2 (i): Appraising any significant changes from consultation</p>
<p>Stage 5: Independent Examination</p>	<p><i>Stage D: Consulting on the preferred options of the Local Plan and IIA Report</i></p> <p>D2 (ii): Appraising any significant changes from representations</p> <p>D3: Preparation of an IIA Statement</p>
<p>Stage 6: Adoption and monitoring</p>	<p><i>Stage E: Monitoring the significant effects of implementing the Local Plan</i></p> <p>E1: Finalising aims and methods for monitoring</p> <p>E2: Responding to adverse effects</p>

Figure 3-2 - Local Planning Process Vs SA Process



3.7 IIA Report Methodology

- 3.7.1. Stage C (this report) comprises the assessment of the preferred Local Plan, against the IIA Appraisal Framework objectives identified within the Scoping Report. This follows on from the previous assessment undertaken at for the Regulation 18 Interim IIA Report.
- 3.7.2. As per the SEA regulations, the IIA also needs to consider and compare all reasonable alternatives as the plan evolves and assess these against the baseline environmental, economic and social characteristics of the borough. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan.
- 3.7.3. There are not currently any alternative policies, therefore, the IIA has continued to assess two different scenarios – the continuation of the existing Local Plan and the application of the London Plan¹⁶. There are proposed alternative sites, which have been assessed alongside the proposed allocations.
- 3.7.4. This IIA Report will therefore cover the assessment of:
- Compatibility assessment of the Visions and Strategic Objectives;
 - Local Plan preferred policies;
 - Alternative policy scenarios;
 - Site allocations; and
 - Site alternatives.

Compatibility Assessment

- 3.7.5. Testing the compatibility of the preferred Local Plan's Strategic Policies and Objectives against the IIA Appraisal Framework help to identify both potential synergies and inconsistencies. This information can help in developing and refining the objectives of the Local Plan.

See **Section 5** for further details.

Assessment of Effects

- 3.7.6. The assessment of policies, sites and alternatives has considered the following:
- Overall effect significance (negative, positive, uncertain, potential for both negative and positive effect or negligible)
 - Nature of effect (direct, indirect)
 - Spatial Extent (local, regional, national)

¹⁶ Mayor of London, The London Plan, 2021 [online] available at:
https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

- Reversibility of effect:
 - Reversible: The receptor can return to baseline condition without significant intervention
 - Irreversible: The receptor would require significant intervention to return to baseline condition
- Duration (short, medium or long term) – Short term: 0-5 years, Medium term: 5-10 years (up to the end of the plan period) Long term: 10+ years (beyond the plan period).

3.7.7. **Table 3-2** sets out the key to the assessment, whilst the detailed Assessment criteria is set out in **Appendix B**.

Table 3-2 – Key to Assessment

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local – borough wide / regional – Greater London / national - England)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

- 3.7.8. It should be noted that where uncertain and negligible effects have been identified, it has not been possible to determine the nature of effect, the spatial extent, the reversibility or the duration of effect. In this instance, these cells have been left blank.

Assessment of Policies

- 3.7.9. The assessment of policies has been undertaken by themes which have been assessed together. The assessment of policies within themes and sub-themes have been standalone assessments, which purely assess the outcome of the application of those policies rather than the draft Local Plan as a whole.

Policy Alternatives

- 3.7.10. The assessment of policy alternatives will assess two scenarios – the continuation of the existing Local Plan and the application of just the London Plan. The assessment would not assess individual policies within these documents but will look at the application as a whole.
- 3.7.11. A high level summary of effects on each of the IIA objectives will be provided and each will be scored using the Key to Assessment set out in **Table 3-2** above. See **Section 6** for further details.

Assessment of Sites

- 3.7.12. An initial red, amber, green (RAG) assessment for both the site allocations and alternative sites was undertaken using spatial indicators for each of the IIA Appraisal Framework objectives.
- 3.7.13. Relevant data on spatial environmental, social and economic indicators, as well as those specifically relevant to health and equalities, have been loaded onto an online WebGIS platform, which has facilitated the site assessments.
- 3.7.14. Spatial calculations were undertaken following the RAG criteria (as set out in **Appendix B**). This has allowed a quick build-up of a RAG assessment of sites and build an overview matrix of the assessment and the performance against the spatial indicators.
- 3.7.15. It should be noted that the RAG assessment simply highlights the potential sensitivity of different indicators, it doesn't necessarily mean that the indicators are good or bad. For instance, an area of overall deprivation could be more highly sensitive to change so scored red (R), however, development of the site could in turn reduce levels of deprivation.
- 3.7.16. Due to this professional expertise has been used to review and validate this initial RAG rating to provide the final assessment of each site.
- 3.7.17. This RAG assessment provided a good overview of key environmental, social and economic constraints at each of the sites, allowing for a more thorough assessment. This assessment has been used as a key starting point for assessing the effects of sites against the IIA framework objectives.

Cumulative Effects

- 3.7.18. The SEA Regulations require that cumulative effects are considered when identifying likely significant effects. Therefore, a number of plans and policies (local, regional and national) have been reviewed for potential cumulative effects in addition to potential cumulative effects that could occur alongside the implementation of the draft Local Plan.
- 3.7.19. In addition, the assessment of sites has considered the cumulative effects of neighbouring development sites, including those beyond the borough boundary.
- 3.7.20. The assessment of cumulative effects has been identified in **Section 9** of this report.

Mitigation, Enhancement Measures and Monitoring

- 3.7.21. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment as a result of implementing the plan. The measures are known as ‘mitigation’ measures.
- 3.7.22. Mitigation measures have been identified in relation to the assessment of policies, place visions, site allocations and site alternatives. These include both proactive avoidance of adverse effects and actions taken after potential effects have been identified. These are set out in **Section 10** of this report.
- 3.7.23. **Section 10** also includes enhancement measures, which aim to optimise positive impacts and enhance sustainability. The mechanism for delivery will ensure the promotion, prevention, reduction and offset of any significant adverse effects or enhancement opportunities on the environment.
- 3.7.24. The SEA Regulations also require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.

3.8 Assumptions and Limitations

- 3.8.1. The preparation of the Local Plan alongside the IIA has allowed an iterative process of assessment and refinement in the narrative and policies within the Plan. Therefore, some of the recommendations set out in this report may already have been addressed in the Local Plan.
- 3.8.2. The assessment of policies, policy alternatives, sites and alternative sites, has been undertaken as a desk-based exercise using the baseline information from the Scoping Report. No site visits have been undertaken specifically for the purposes of the IIA.
- 3.8.3. WSP have ensured that effects are predicted accurately; however, this can be challenging given limited understanding of precisely how the plan will be implemented. Given

uncertainties there is inevitably a need to make some assumptions, however, these are made carefully and explained in detail within the assessment text.

- 3.8.4. In some instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is possible to comment on the potential positive and negative effects of the draft plan and its alternatives in more general terms.

4 Identification of Sustainability Issues and Opportunities and the IIA Framework

4.1 Introduction

- 4.1.1. This section sets out the sustainability issues and opportunities for the Local Plan and the IIA Appraisal Framework, against which the Local Plan has been assessed.
- 4.1.2. A Scoping Report, in support of the emerging Local Plan, was produced by WSP in 2023, which initiated the SEA process (see **Table 3-1**). This report reviewed relevant legislation, plans, and programmes baseline, identified baseline information as well as key issues and opportunities for the Local Plan and identified an assessment framework.
- 4.1.3. This report was consulted on with the Statutory Consultees (Environment Agency, Historic England and Natural England) in July 2023 and details on their consultation comments can be found in **Appendix B**. It should be noted that the Environment Agency have received the IIA Scoping Report but are yet to comment. If comments are received, we will consider these at the Regulation 19 stage.

The baseline information used within the IIA Scoping Report is set out in **Appendix C**.

4.2 Review of Plans Policies and Programmes

- 4.2.1. A plan may be influenced in various ways by other plans, policies or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. These relationships enable the Responsible Authority to take advantage of potential synergies and to deal with any inconsistencies and constraints.
- 4.2.2. The Scoping Report undertook an initial review of policies, plans, programmes, strategies and initiatives that may have an impact on the preparation of relevant policies being reviewed as part of the Local Plan update. This review has informed both the development of the Local Plan and the IIA framework.
- 4.2.3. Full details on the review of plans, policies and programmes is set out in **Appendix D**.

4.3 Sustainability Issues and Opportunities

- 4.3.1. The Scoping Report set out a number of issues and opportunities for the Local Plan, for each of the IIA topics outlined in the Scoping Report. These have been summarised in **Table 4-1** below.

Table 4-1 – Issues and Opportunities

Topic	Issues and Opportunities
Population and Equalities	<ul style="list-style-type: none"> ■ There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income. ■ There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities. ■ The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile. ■ Changing work habits such as remote, internet-based jobs are likely to reduce current demands but may also increase social isolation and reliance on alternative social interaction.
Human Health	<ul style="list-style-type: none"> ■ LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness, smoking, and Sexually Transmitted Infection (STI) treatment. ■ There are significant health inequalities amongst residents in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents. ■ Covid-19 has also exacerbated existing inequalities in the borough. ■ There are high levels of obesity within children aged 10-11 years.
Economy and Employment	<ul style="list-style-type: none"> ■ LBTH is a major location for employment in London, attracting a large daytime population of employees. ■ Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount are employed. Employed residents in LBTH have a higher gross value added (GVA) per head and gross weekly pay. ■ However, there is a higher economic activity rate, with more males economically active than females. ■ This also highlights that there may be a need to diversify employment within the borough, particularly to match the skills of existing residents. ■ In the recovery of Covid-19 it is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough. ■ Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping.
Housing	<ul style="list-style-type: none"> ■ The average house price is over ten times higher than the average salary in the borough.

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> ■ The population is increasing and becoming younger, with more residents requiring affordable housing. ■ Rising costs of living are affecting the number of residents able to afford to buy. ■ The Covid-19 pandemic and rising cost of living is increasing levels of homelessness and housing insecurity. ■ There is a lack of affordable housing, meaning young people and/or lower income groups are missing out.
<p>Crime and Safety</p>	<ul style="list-style-type: none"> ■ There is potential to increase engagement within communities to encourage the reporting of crimes. ■ Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour. ■ There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours. ■ As the population within LBTH increases there are expected to be a greater number of vehicles on the borough’s roads, which may result in an increase in the number of accidents and those Killed or Seriously Injured (KSI) on roads. ■ Children in the most deprived neighbourhoods are nearly three times more likely to be KSI as a pedestrian compared to non-deprived neighbourhoods. ■ There are opportunities to increase the safety of active transport modes such as cycling and walking. ■ Vulnerable road users such as cyclists and pedestrians are more likely to be casualties. ■ There is potential to increase the standards and safety of housing within the borough.
<p>Transport and Accessibility</p>	<ul style="list-style-type: none"> ■ There is a need to improve sustainable transport modes (public and active) in line with THBC’s commitment to reach net-zero GHG emissions by 2045. ■ Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs. ■ Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender. ■ Changing work habits such as remote, internet-based jobs and working from home are likely to reduce transport demand. ■ Health inequalities are prevalent in the borough, therefore reducing significant issues with traffic and congestion and subsequent air pollution is of utmost importance.

Topic	Issues and Opportunities
Biodiversity and Natural Capital	<ul style="list-style-type: none"> ■ Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas, notably the European designations. ■ Increasing population and associated developments may lead to fragmentation and urbanisation of natural habitats. ■ Increasing population and developments may result in worsening air quality that may degrade the borough’s valuable ecological receptors. ■ New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity. ■ The inclusion of Blue Green Infrastructure (BGI) can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island (UHI) effects and help to make developments more climate resilient, especially when it comes to flood mitigation.
Landscape and Townscape	<ul style="list-style-type: none"> ■ Development has the potential to cause direct and indirect impacts on designated landscapes and townscapes, affecting the character and sense of place. ■ Future growth could risk compromising landscape and townscape character and features. However, a landscape-led design with GI principles in place could play a key role in the enhancement of the natural environment, visual amenity, and physical and mental health of the borough’s people. ■ The design of new developments requires a landscape-led approach to design, to ensure the best placement and integration of the proposed development into the existing landscape, especially in sensitive locations. Landscape-led designs can help contribute to the climate change agenda, health and wellbeing, and tackling pollution in all its forms (such as air, light and noise). ■ There is opportunity to increase access to green space and subsequently, to improve health and wellbeing, combat air pollution, provide storm water management and reduce flooding (contributing to climate change adaptation and mitigation) and provide connectivity through urban built form to the countryside for wildlife. It can also bring new audiences to tourist attractions and enable better appreciation of historic landscape assets through creating new views and vistas, providing information, and enhancing access. ■ The incorporation of landscape principles that are suitable for future challenges and landscape-led designs would help to ensure infrastructure is designed for longevity in the 21st century, for both its people and its natural environment.
Historic Environment	<ul style="list-style-type: none"> ■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active modes and asset settings.

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> ■ Trans-boundary matters should be noted and the impact that development in LBTH may have on heritage in other boroughs. ■ There is potential for development to encroach on assets, particularly affecting the setting of assets, for example through land take, and increased noise and visual effects. Although damage to the significance and setting of assets from development is not limited to these factors; Archaeological remains, whether designated or not, normally require preservation <i>in situ</i>. This clearly has implications and can represent a significant constraint to future scheme design, which should respect, retain and protect the remains (e.g., through avoidance and redesign). ■ Vehicle damage and pollution can adversely affect World Heritage Site's, listed buildings and scheduled monuments, so reducing vehicle movements within historic areas is also important to address. ■ The New Local Plan should ensure that the local historic environment (including the archaeological resource) informs design proposals, public realm and landscaping schemes to help ensure that heritage assets and their settings are enhanced. ■ There is potential for physical interventions to historic buildings intended to improve energy efficiency to adversely affect heritage significance if not carefully thought through and appropriate to the building in question
Water Environment	<ul style="list-style-type: none"> ■ The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat. ■ Upgrading existing infrastructure provides the opportunity to improve pollution control. ■ Increased development (including transport, housing and other infrastructure) can increase flood risk on a local and catchment scale. ■ Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the already stressed capacity of sewer systems. ■ Climate change is likely to increase the occurrence of flooding from all sources and hence raise the flood risk in LBTH.
Air Quality	<ul style="list-style-type: none"> ■ The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation. ■ More severe and frequent heat episodes as a result of climate change can contribute to the worsening of air quality. ■ Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases.

Topic	Issues and Opportunities
	<ul style="list-style-type: none"> ■ The UK Government’s plan to end the sale of all new conventional petrol and diesel cars and vans by 2035 and support for work and home-based electric charging facilities, will promote use of hybrid and electric vehicles, with positive effects for air quality. ■ Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality.
Climate Change and Greenhouse Gases	<ul style="list-style-type: none"> ■ Transport is the largest contributor to Greenhouse Gas (GHG) emissions in the UK. In LBTH, the largest contributor is from commercial uses. ■ Higher than average fuel poverty rates may continue to be a significant issue in the borough. ■ Since the Covid-19 pandemic, private car use has increased which contributes to GHG emissions. ■ The impacts of the Urban Heat Island (UHI) generated in London will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households. ■ There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH. ■ There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit.
Material Assets (including Soil Resources)	<ul style="list-style-type: none"> ■ The growing population and associated need for development is likely to increase the use of mineral resources and waste generation. This is highly important considering the Belvedere Energy from Waste (EfW) facility processes waste from across London. ■ Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population. ■ There is a continued increase in renewable energy supplies across the borough, of which needs to be managed efficiently to ensure the capacity requirements of this transition are met.

4.4 IIA Appraisal Framework

- 4.4.1. The review of relevant plans, policies and programmes, collation of baseline information and identification of issues and opportunities, has been used to inform the IIA Appraisal Framework, which is set out in **Table 4-2** overleaf.
- 4.4.2. This table also sets out the spatial indicators used to assess each of the objectives as part of the site assessments.

Table 4-2 – IIA Appraisal Framework

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
<p>Population and Equalities</p>	<p>IIA1: To build inclusive communities by reducing social exclusion, promoting equity, and equality and respecting diversity.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Help to reduce inequalities, particularly for those people and communities most vulnerable? ■ Improve access to services, facilities and transport for all inclusively? ■ Support diversity? ■ Support population growth? 	<ul style="list-style-type: none"> ■ Population density ■ Indices of Multiple Deprivation (IMD) Overall Deprivation ■ Primary Schools ■ Secondary Schools ■ Higher Education ■ Healthcare Provision (GP, dentists, pharmacies and hospitals) ■ Children and Family Centres ■ Community Centres ■ Leisure Services ■ Social Services
<p>Human Health</p>	<p>IIA2: To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH’s residents.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Promote healthier lifestyles? ■ Increase walking and cycling? ■ Improve quality, quantity and equality of access to green and blue space and increase opportunities for recreation? ■ Promote health enhancing environments, behaviours and activities for local communities? ■ Reduce inequalities? ■ Increase inclusion and reduce loneliness? 	<ul style="list-style-type: none"> ■ IMD Health Deprivation ■ Life expectancy (males and females) ■ Primary Schools ■ Secondary Schools ■ Higher Education ■ Healthcare Provision (GP, dentists, pharmacies and hospitals) ■ Children and Family Centres ■ Community Centres ■ Allotments ■ Leisure Services ■ Social Services

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<ul style="list-style-type: none"> ■ Help prevent risks to human health, which arise from noise and air pollution? ■ Support the UK's levelling up agenda? ■ Reduce the pressure of the rising cost of living? ■ Increase exposure to noise and air pollution? 	<ul style="list-style-type: none"> ■ Sports Facilities ■ Areas Deficient in Nature
<p>Economy and Employment</p>	<p>IIA3: To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets' town centre and other district and local centres.</p> <p>IIA4: To ensure that residents have employment opportunities and access to training.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Increase job availability? ■ Improve access to employment centres? ■ Improved connectivity between business clusters and housing markets? ■ Support flexible working patterns? ■ Help support changing retail patterns? ■ Increase retail floorspace? ■ Increase footfall and local spending from commuters, residents and tourists? ■ Meet the skills needs and future demand for labour? ■ Diversify the labour market? 	<ul style="list-style-type: none"> ■ IMD Employment ■ IMD Income ■ Local Industrial Location ■ Strategic Industrial locations ■ Employment sites ■ Local Employment Location ■ Higher Education ■ Central Activities Zone ■ Tower Hamlets Activity Zone ■ Primary Shopping Areas ■ Neighbourhood Parades ■ Primary Shopping Areas ■ Town Centres (major, district and neighbourhood)

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
<p>Housing</p>	<p>IIA5: To meet the housing needs of all of the borough’s residents inclusively.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Help to sufficiently meet the borough’s housing target? ■ Increase affordability? ■ Optimise proposed sites to maximise housing delivery? ■ Reduce housing deprivation? ■ Meet the needs of all groups inclusively (elderly residents, young families, disabled, ethnic minorities etc.)? ■ Support those with protected characteristics (e.g., the gypsy and traveller community) ■ Increase the quality of existing housing stock? ■ Reduce overcrowding? 	<ul style="list-style-type: none"> ■ IMD Barriers to housing (LSOA) ■ House Prices (wards)
<p>Crime and Safety</p>	<p>IIA6: To reduce crime and the fear of crime for all residents inclusively</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Improve safety? ■ Ensure that residents feel safe, particularly after dark? ■ Support designing out crime principals? ■ Reduce levels of crime derivation? ■ Improve road safety and reduce the number of people KSI on the roads, 	<ul style="list-style-type: none"> ■ IMD Crime ■ Crime Rate by ward

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		particularly children from deprived backgrounds? ■ Create spaces where women and girls feel safe and included?	
Transport and Accessibility	IIA7: To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally. IIA8: To protect and enhance access to essential services and facilities for all residents.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Support the use of sustainable transport modes? ■ Improve access to services, facilities and transport? ■ Reduce demand for use of the private car and facilitate a modal shift to more sustainable modes? ■ Ensure that all groups can access services and facilities inclusively? ■ Support EV infrastructure? 	<ul style="list-style-type: none"> ■ Public Transport Accessibility Levels (PTAL) ■ Bus Stops ■ National Rail Train Station/ Tube Station ■ Primary Schools ■ Secondary Schools ■ Higher Education ■ Healthcare Provision ■ Children and Family Centres ■ Community Centres ■ Leisure Services ■ Social Services ■ Sports Facilities ■ Primary Shopping Areas ■ Neighbourhood Parades ■ Primary Shopping Areas ■ Town Centres (major, district and neighbourhood)
Biodiversity and Natural Capital	IIA9: To protect and enhance protected habitats, species and valuable ecological networks that contribute to	Will the policy or proposal: <ul style="list-style-type: none"> ■ Cause damage to locally and nationally designated sites through infrastructure provision, increased 	<ul style="list-style-type: none"> ■ Local Nature Reserve (LNR) ■ National Nature Reserve (NNR) ■ Priority Habitat ■ Site of Importance for Nature Conservations (SINC)

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
	ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.	development, recreational pressures, traffic or maintenance? <ul style="list-style-type: none"> ■ Maintain and enhance biodiversity in the borough? ■ Seek opportunities for biodiversity for at least 10% net gain? ■ Increase provision of ecosystem services from the borough’s natural capital? ■ Prevent fragmentation of habitats and promote ecological networks? ■ Result in developments which will improve biodiversity on site? ■ Fragment habitat connectivity and reduce the ability for biodiversity to thrive? 	<ul style="list-style-type: none"> ■ SAC ■ Site of Special Scientific Interest (SSSI) ■ SPA ■ Green Grid Network
Landscape and Townscape	IIA10: To protect and enhance the borough’s townscapes and landscapes.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Respect, maintain and strengthen local character and distinctiveness? ■ Achieve high quality sustainable design for buildings, spaces and the public realm? ■ Improve the quality and condition of the townscape and landscape? ■ Improve the quality of parks and open spaces? ■ Incorporate green and blue infrastructure into design? 	<ul style="list-style-type: none"> ■ Borough Designated Views ■ London View Management Framework ■ Tall Building Zone ■ Strategically Important Skyline ■ London Squares ■ Local Open Space ■ Metropolitan Open Land ■ Green Grid Network

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
Historic Environment	IIA11: To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Conserve and/or enhance heritage assets, their setting and the wider historic environment? ■ Contribute to the better management of heritage assets and contribute to conserving heritage at risk? ■ Improve the quality and condition of the historic environment? ■ Respect, maintain and strengthen local character and distinctiveness? 	<ul style="list-style-type: none"> ■ Listed Buildings ■ Registered Parks and Gardens ■ Scheduled Monuments ■ Heritage at risk ■ Conservation areas ■ Archaeological Priority Area
Water Environment	IIA12: To reduce the risk and vulnerability to flooding. IIA13: To maintain and enhance water quality.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Reduce the risk of flooding? ■ Result in urban creep? ■ Increase surface runoff? ■ Result in the reduction of water quality (including groundwater)? ■ Support the protection and enhancement of water bodies (including groundwater)? ■ Encroach on the 10m buffer zone next to a watercourse? ■ Alter the natural state of the river corridor? ■ Re-naturalise the river corridor and promote geomorphological 	<ul style="list-style-type: none"> ■ Statutory Main River ■ Water Spaces ■ Flood Zones (2, 3, 3a) ■ Flood Risk Area ■ Critical drainage area

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<p>processes which enhance and protect biodiversity?</p> <ul style="list-style-type: none"> ■ Support a natural form of flood management which also promotes biodiversity of the watercourse? 	
Air Quality	IIA14: To protect and enhance air quality.	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Support measures to reduce levels of air pollution? ■ Help to improve air quality? ■ Support measures for the reduction of congestion and traffic levels particularly in AQMAs and congestion hot-spots? 	<ul style="list-style-type: none"> ■ Nitrogen dioxide (NO2) ■ Particulate Matter (PM10) ■ Motor Vehicle restricted area ■ Air Quality Focus Areas ■ Ultra Low Emission Zone (ULEZ)
Climate Change and Greenhouse Gases	<p>IIA15: Ensure that Tower Hamlets is resilient to the effects of climate change.</p> <p>IIA16: To reduce GHG emissions, support national and local decarbonisation initiatives and encourage energy efficiency.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Support low carbon and energy efficient design? ■ Contribute further to the urban heat island effect? ■ Ensure new development is designed to mitigate overheating risk? ■ Increase the resilience of infrastructure and material assets to the impacts of climate change (including flood risk, extreme weather, heat and cold)? 	<ul style="list-style-type: none"> ■ Overall Climate Risk ■ Overall Heat Risk ■ Flood Zone ■ Flood Risk Area ■ NO₂ ■ PM₁₀ ■ Motor Vehicle restricted area ■ ULEZ

IIA Topic	IIA Objective	Supporting Questions	Relevant Spatial Indicators
		<ul style="list-style-type: none"> ■ Contribute to reducing emissions as per the Paris Agreement? ■ Support the borough’s Net Zero ambitions by 2045? 	
Material Assets (including Soil Resources)	<p>IIA17: To reduce the amount of waste produced and minimise the amount sent to landfill.</p> <p>IIA18: To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.</p>	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> ■ Support the use of brownfield land? ■ Support the use of sustainable materials? ■ Minimise the amount of waste? ■ Increase renewable energy generation? ■ Support low carbon, energy efficient design? ■ Reduce levels of embodied carbon? 	<ul style="list-style-type: none"> ■ Brownfield Land ■ Waste management sites ■ Safeguarded Wharves

5 Compatibility Assessment of Strategic Policies and Objectives

5.1 Introduction

- 5.1.1. This section assesses the compatibility of the Objectives and Strategic Policies against the IIA Appraisal Framework objectives.
- 5.1.2. The Strategic Policies and Objectives have been individually tested against the IIA Appraisal Framework objectives to identify both potential synergies and inconsistencies. This information can help in developing and refining the objectives of the Local Plan.
- 5.1.3. **Table 5-1** below sets out the key to appraisal, whilst **Table 5-2** overleaf sets out the findings of the compatibility testing of the Strategic Policies and the Strategic Objectives.

Table 5-1 – Key to Compatibility Assessment

Effect	Key
Compatible	✓
Incompatible/ potential conflict	✗
No relationship	0
Uncertain/ more than one potential outcome	?

Table 5-2 – Compatibility Assessment

	IIA1: Population and Equalities	IIA2: Human Health	IIA3: Economy	IIA4: Employment	IIA5: Housing	IIA6: Crime and Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity and Natural Capital	IIA10: Landscape and Townscape	IIA11: Historic Environment	IIA12: Flood Risk	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change	IIA16: Greenhouse Gases	IIA17: Waste	IIA18: Efficient use of Resources
Vision	✓	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	?	?	✓	?	✓	?	?
Objective 1: Empowering our communities culturally, economically, and politically	✓	✓	✓	✓	0	0	0	0	0	✓	✓	0	0	0	0	0	0	0
Objective 2: Tackling overcrowding and housing in our borough	✓	✓	0	0	✓	0	0	✓	?	?	?	?	0	0	0	?	?	✓
Objective 3: Supporting young people and accelerating education	✓	✓	✓	✓	0	✓	0	✓	✓	✓	0	0	0	0	0	0	0	0
Objective 4: A thriving local and global economy that boosts jobs, skills, businesses and tackles inequalities	✓	✓	✓	✓	0	0	✓	✓	0	0	0	0	0	0	0	0	0	0
Objective 5: Securing infrastructure delivery to protect and strengthen public services	✓	✓	✓	✓	✓	✓	✓	✓	?	?	?	?	0	0	0	?	?	0
Objective 6: A clean and green future	✓	✓	0	0	0	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	✓
Objective 7: Healthy, safe and inclusive neighbourhoods	✓	✓	✓	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0

5.2 Compatibility Assessment Summary

- 5.2.1. In general, the Vision and Objectives have performed well against the majority of the IIA objectives and clearly demonstrate their compatibility. Whilst the assessment has not identified any incompatible effects, some uncertainties have been identified.
- 5.2.2. On the whole, the Vision and supporting Objectives have predominantly resulted in a positive effect as it covers the three key pillars of sustainability (economy, social and environment) and aims to tackle key issues such as climate change, net zero, biodiversity loss, inequalities, overcrowding and affordable housing, which aligns with the aims and aspirations of the IIA objectives.
- 5.2.3. Due to the cross-cutting nature of the ‘clean and green future’ objective (Objective 6), this is the most compatible across all objectives. LBTH aim to reduce their dependence on cars and improve both the natural and built environment to make walking and cycling attractive for local journeys, providing greater accessibility. This will allow residents to live their lives more locally, creating more inclusive neighbourhoods, having positive effects on population and equalities (IIA1) and human health (IIA2). Reducing the need to travel will also result in positive outcomes for IIA7 (sustainable transport) and IIA8 (accessibility).
- 5.2.4. Objective 6 also aims to improve air quality (IIA14), set high energy standards and support zero carbon developments (IIA16 and IIA18). Further support is also provided to ensuring climate resilience through greater mitigation for flood risk both now and in the future.
- 5.2.5. The Vision and Objectives 2 and 5 have identified the potential for uncertain effects on a number of IIA objectives. This is due to the potential for these policies to result in large scale development and infrastructure to support the borough’s communities. These sites are likely to require land take, which may negatively affect biodiversity and natural capital (IIA9) and depending upon the location, the surrounding landscape and townscape (IIA10) and historic environment (IIA11). Similarly, the increase in development may increase levels of embodied carbon and operational GHG (IIA16), generate large amounts of waste (IIA17) and may contribute to increases levels of flood risk (IIA12).
- 5.2.6. However, as this is a high-level Vision and overarching objectives, there is no certainty to how such development might arise, and there may be potential for developments to bring about positive effects on these objectives.
- 5.2.7. Waste (IIA17) is the only IIA objective which does not have any compatibility with either the vision or any objectives. Neither the vision or objectives make reference to minimising waste or encourage the use of sustainable materials.

6 Assessment of Policies

6.1 Introduction

- 6.1.1. The assessment of the Local Plan policies is summarised below and presented in full in **Appendix F**. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 6-1** below. It should be noted that the Policy themes have been assessed as a whole against each of the IIA objectives, rather than each individual policy.
- 6.1.2. Each of the policy themes have been assessed in isolation, without mitigation. The assessment purely assesses the outcome of the application of those policies rather than their relationship with other policies within the plan. Further details on the combination effects with other policies have been identified in within the individual assessment summaries in **Appendix F** as well as **Section 9 – Cumulative Effects**.
- 6.1.3. **Table 6-2** overleaf provides an overview on the performance of the Local Plan policy themes against each IIA objective and **Table 6-3** outlines significant effects based on each IIA objective. For the purpose of the IIA, significant effects are deemed to be the following:
- Significant Positive effects;
 - Significant Negative effects; and
 - Uncertain effects.
- 6.1.4. Further details on the insignificant effects i.e., minor positive, minor negative, mixed and neutral effects are detailed in **Appendix F**. The Appendix also sets out the nature of effects such as magnitude, spatial extent and duration.

Table 6-1 – Significance of Effect

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-

Effect Significance	Key
Negligible / No effect	0

6.2 Summary of Effects

Table 6-2 provides an overview on the performance of the Local policy themes against each IIA objective and Table 6-3 outlines significant effects based on each IIA objective.

Table 6-2 – Overview of Policies

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA1: Population & Equalities	++	++	+	++	+	++	++	++	++	0
IIA2: Human Health	++	++	++	++	+	+	++	++	++	+
IIA3: Economy & Town Centres	++	++	0	+	++	++	++	0	+	0
IIA4: Employment & Skills	++	+	+	0	++	++	++	0	0	+
IIA5: Housing	+	++	+	+	-	0	0	0	0	+

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA6: Crime & Safety	+	+	0	++	0	+/-	+	+	++	+
IIA7: Sustainable Transport	+	+	+	+	++	+	+	+	?	+
IIA8: Accessibility	++	+	0	++	+	+	++	+	++	0
IIA9: Biodiversity & Natural Capital	+	+/-	++	+	?	0	?	++	?	?
IIA10: Landscape & Townscape	+	+/-	+	++	+/-	+	?	++	+/-	?
IIA11: Historic Environment	+	?	+	++	+/-	?	?	+	+/-	?
IIA12: Flooding	++	?	++	+	?	0	0	++	0	0

IIA Objective	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste
IIA13: Water Quality	+	0	++	+	0	0	0	++	?	?
IIA14: Air Quality	+	+/-	++	+	+/-	+	+	+	?	+/-
IIA15: Climate Change & Resilience	+	+	++	+	0	0	0	++	0	0
IIA16: GHG Emissions	+	?	++	+	?	0	?	+	+/-	+/-
IIA17: Waste	+	?	++	+	?	0	?	0	?	++
IIA18: Efficient use of Land and Resources	0	+/-	++	+	+	+	+	+/-	?	0

Table 6-3 – Summary of Significant Effects

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA1: Population & Equalities	7	0	0	<p>Out of all of the IIA Objectives, IIA1 has resulted in the highest number of significant positive effects. These effects are generally attributed to the support provided to the needs of all of the borough’s residents inclusively, both now and in the future. Both the Town Centre and Community Infrastructure policies will increase community facilities.</p> <p>More specifically, Policy PS4 within People, Places and Spaces theme will ensure that all genders are able to access community spaces equally. Additionally, both MC1 and MC2 (within the Movement and Connectivity theme) provide improved accessibility to all social groups, including disabled, elderly, women and girls and other marginalised groups.</p>
IIA2: Human Health	7	0	0	<p>Seven out of the ten policy themes have resulted in significant positive effects on IIA2. Most of these effects have been identified for those policies which aim to provide more community infrastructure and green spaces, enable greater levels of physical activity and improve standards of living. Not only will policies improve physical health but also mental wellbeing.</p> <p>More specifically, Policy PS3 (within the People, Places and Spaces theme), Policy BO2 (within the Biodiversity and Open Space theme), and Policies G2, CG3 and CG4 (within Clean and Green Future) tackle adverse effects that environmental factors such as overheating, wind, air pollution, light pollution noise pollution, and odours which can have harmful effects on human health.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA3: Economy & Town Centres	5	0	0	<p>The Town Centre Policies have had significant positive effects on IIA3 as they contribute to increasing footfall and improving the diversity of the economy within Tower Hamlets, encouraging economic growth through a range of sectors across the borough. Similarly, the Policies within the Inclusive Economy and Good Growth theme have resulted in significant positive effects through creating jobs, employment spaces and attracting inward investment into the borough.</p> <p>Further indirect significant positive effects have been derived from the Homes for the Community, Delivering the Local Plan and Community Infrastructure policy themes, as these will likely bring new facilities and services to support the local population and increase economic output and productivity.</p>
IIA4: Employment & Skills	4	0	0	<p>Four out of the ten policy themes have resulted in Significant positive effects on IIA4. Those significant positive effects are generally attributed to those policies which aim to increase employment opportunities across a number of sectors and provide learning and development opportunities.</p> <p>More specifically Policy EG1 will provide improved job opportunities for all groups of the working population, including those with current low levels of education. The policy also provides jobs across the borough, providing jobs for a range of communities. Similarly, Policy DV1 (within the Delivering the Local Plan theme) protects and enhances existing employment locations within the borough, as well as supporting a mix of new employment opportunities including affordable workspaces, to encourage a diverse range of employment opportunities.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA5: Housing	1	0	0	<p>Whilst a number of minor positive effects have been identified for IIA5, it is just the Homes for the Community policies which have resulted in Significant positive effects. All policies within this theme will help to deliver a wide variety of housing to suit the needs of all residents and exceeds the borough’s housing targets.</p> <p>In addition to the delivery of new housing, Policy HFC3 aims to protect existing housing, particularly ensuring that the supply of self-contained homes and in particular family-sized homes is maintained. Similarly, HC4 will ensure that any existing homes meet the latest Decent Homes Standard.</p>
IIA6: Crime & Safety	2	0	0	<p>The People Places and Spaces and Movement and Connectivity policy themes have resulted in significant positive effects on IIA6. These effects have been identified for those policies such as PS4 and MC2 that directly tackle crime and improve safety, as well as those policies that support improvements to the public realm. Improvements to the public realm and incorporation of high-quality design can engender a sense of pride in a place, which in turn can help to discourage crime.</p>
IIA7: Sustainable Transport	1	0	1	<p>The Inclusive Economy and Good Growth policy theme is the only themes that has resulted in significant positive effects on IIA7. Policies within these themes will help to reduce reliance upon the private vehicles and contribute to a modal shift.</p> <p>Whilst the Movement and Connectivity policy theme has the potential to result in significant positive effects through enhanced sustainable transport and support of a modal shift, there is some uncertainty around the additional provision of parking as</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				a result of MC4, and whether this could lead to an increase in the reliance and convenience of motorised vehicles. This will very much depend on the implementation and the number of additional spaces provided.
IIA8: Accessibility	4	0	0	<p>Of the ten policy themes, four have resulted in significant positive effects on IIA8. Policies will improve accessibility by provide greater connectivity to active transport as well as enhancing and increasing access to essential services and facilities for all residents. This will not only result in a modal shift but allow residents to live their lives more locally.</p> <p>Policy PS4 specifically outlines the requirements for development to maintain accessible street networks and enhance connectivity through developments. This includes connectivity to public transport hubs and improving accessibility around the borough.</p>
IIA9: Biodiversity & Natural Capital	2	0	4	<p>All policies within the Biodiversity and Open Space policy theme contribute to improving biodiversity and natural capital across the borough, including improving and enhancing blue and green spaces, green infrastructure, and contributing towards biodiversity net gain (BNG). This has resulted in significant positive effects on IIA9. Additionally, Policy CG9 within Clean and Green Future has resulted in significant positive effects on IIA9 through improvements to biodiversity as a result of reduce air pollution and utilisation of nature-based solutions.</p> <p>Four of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could give rise to the</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				loss of biodiversity and natural capital, but as the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
IIA10: Landscape & Townscape	2	0	2	<p>The Biodiversity and Open Space and People, Places and Spaces policy themes have resulted in Significant positive effects on IIA10. These policies will help to maintain and enhance the landscape and townscape character in the borough, by enhancing the public realm and preserving Metropolitan Open Land (MOL) and green and blue spaces.</p> <p>Two of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could be insensitively designed and/ or result in the loss of greenspace, but as the location and overall design of proposals is not yet known uncertain effects have been identified.</p>
IIA11: Historic Environment	1	0	4	<p>The People, Places and Spaces policies are the only policy theme that has resulted in significant positive effects on IIA11. Within this groups Policy PS6 specifically outlines the preservation and enhancement of designated and non-designated heritage assets, including archaeological areas and heritage at risk. Policy PS7 also requires the safeguarding of the two World Heritage Sites within the borough, resulting in positive effects.</p> <p>Four of the policy themes have however, resulted in uncertain effects. This is generally where policies may result in developments which could be insensitively designed and/ or result in the degradation and loss of the historic environment. As</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				the location and overall design of proposals is not yet known uncertain effects have been identified.
IIA12: Flooding	3	0	2	<p>The Developing the Local Plan, Clean and Green Future and Biodiversity and Open Space policy themes have both resulted in Significant positive effects on IIA12. Policies within these themes (specifically DV4, CG6, CG7, BO2 and BO3) aim to address flood risk and incorporate measures such as Sustainable Urban Drainage Systems (SuDs) and soft landscaping.</p> <p>Uncertain effects have arisen where there is it is not clear on the number of sites and developments which may come forward as a result of policies. Urban intensification and additional development within the borough could increase flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.</p>
IIA13: Water Quality	2	0	2	<p>The Clean and Green Future and Biodiversity and Open Space policy themes have both resulted in Significant positive effects on IIA12. Policies within these themes (specifically CG8, CG7, BO1 and BO3) aim to protect the water environment and its habitats and ensure that development does not adversely affect the water quality within the borough. Policies also aim to reduce the pressure on the fresh and wastewater systems through reducing demand and increasing water efficiency.</p> <p>Due to the proposed use of water transport, the Reuse, Recycling and Waste and the Movement and Connectivity policy themes have resulted in uncertain effects. There is potential that increase waterborne transport could result in an increase in</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				water pollution and decrease in overall water quality. However, at this stage the potential increase in water transport is not known, so uncertain effects have been identified.
IIA14: Air Quality	1	0	1	<p>The Clean and Green Future policy theme has resulted in significant positive effects. Policies within these themes (specifically CG9 and MC3) address the poor air quality within the borough and the need for developments to mitigate and improve air quality, including promoting low or zero emission transport and reducing vehicle reliance.</p> <p>Whilst the Movement and Connectivity policy theme has the potential to result in significant positive effects through enhanced sustainable transport, there is some uncertainty around the additional provision of parking as a result of MC4, and whether this could lead to an increase in air pollution in areas with existing public transport connectivity issues. This will very much depend on the implementation and the number of additional spaces provided.</p>
IIA15: Climate Change & Resilience	2	0	0	The Biodiversity and Open Space and Clean and Green Future policy themes have resulted in significant positive effects on IIA15. Both themes (specifically policies BO5, CG1, CG5 and CG6) promote measures such as green roofs and walls, SuDS, and soft landscaping, which will help to address issues such as flooding, pollution and overheating.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA16: GHG Emissions	1	0	3	<p>The Clean and Green Futures theme is the only policy theme to result in significant positive effects on IIA16. These policies contribute to reducing GHG emissions through the reduction in energy usage, and vehicle reliance.</p> <p>Due to the potential for significant levels of development and potential increases in embodied carbon, the Movement and Connectivity, Community Infrastructure and Homes for the Community policy themes have resulted in uncertain effects. At this stage it is not clear whether developments include measures to reduce GHG emissions and include renewable energy generation. As many of these measures will be determined by scheme level design, uncertain effects have been identified.</p>
IIA17: Waste	2	0	4	<p>The Clean Green Future and Reuse, Recycling and Waste policy themes have resulted in significant positive effects on IIA17. These policies will help to improve waste facilities, minimise the amount of waste going to landfill, by supporting re-use and recycling and promoting more efficient use of materials.</p> <p>Some proposals which may come forward as a result of the Movement and Connectivity, Homes for the Communities, Community Infrastructure and Inclusive Economy and Good Growth policy themes may be resource intensive and could generate a significant amount of construction waste. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA18: Efficient use of Land and Resources	1	0	1	<p>The Clean and Green Future policy theme is the only theme to result in significant positive effects on IIA18. Policies CG1 and CG11 aim to minimise the use of natural resources, support a circular economy, remediate contaminated land, improve the quality of land within Tower Hamlets and contribute to the utilisation of brownfield land.</p> <p>There are some uncertain effects associated with the Movement and Connectivity policy theme as the location of some proposals that may come forward as a result of these policies is not yet known. Whilst it is likely that the majority may result in the reallocation of the existing road network, there could be potential for some land take. If a preference for road network reallocation is sought there is potential for positive effects.</p>

6.3 Assessment of Policy Alternatives

- 6.3.1. The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the draft plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 6.3.2. The development of the Local Plan policies has not at this stage identified any key policy alternatives, so the assessment of policy alternatives has assessed two scenarios – the continuation of the existing Local Plan and the application of the London Plan. Both of these plans have undergone examination and proven to be robust and at this stage provide a realistic alternative scenario.
- 6.3.3. As the Local Plan is iterative process, there are likely to be policy changes and amendments which will emerge throughout the process. This will provide further reasonable alternatives, for which the IIA can assess. Policy changes/ alternatives will be assessed at the Regulation 19 stage.
- 6.3.4. In general, the continuation of the existing Local Plan and London Plan Policies have resulted in less significant positive effects. However, the policies within each plan do remain relevant and the majority are fit for purpose.
- 6.3.5. The London Plan lack specific borough details, that the local plan can provide, whilst some of the existing Local Plan policies are outdated, and no longer reflect key issues such as the Covid-19 recovery, rising costs of living and increases in crime against women and girls.
- 6.3.6. The assessment demonstrates a clear need for an updated Local Plan in order to better guide decisions on future development proposals and addresses the needs and opportunities within the borough.
- 6.3.7. **Table 6-4** below provides a summary of the application of these scenarios. It uses the same key to effects outline in **Table 3-2**.

Table 6-4 - Assessment of Policy Alternative Scenarios

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
IIA1: Population and Equalities	<p>The existing Local Plan includes policies such as S.CF1, D.CF2, and D.CF3 that include the supporting of existing community facilities and the development of new community facilities. These policies are likely to preserve the existing community facilities, but also provide facilities such as early education, primary and secondary education, and care facilities. The development of facilities such as this will continue to provide for the future population of Tower Hamlets.</p> <p>Policy S.CF1 also includes measures to ensure accessible facilities and services, providing access for various population groups. However, the existing local plan does not include a specific policy relating to equalities. Minor positive effects have therefore been identified.</p>	+	<p>There are a number of policies within the London Plan, including GG1, GG4 and GG5 that contribute to improvements to communities within Tower Hamlets. The London Plan also aims to improve growth and inclusive development within the Borough, including accessible design with policy D5.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the population in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects. Additionally, as the population in Tower Hamlets is predicted to grow by 8.4%, with more people living on their own and increased in diversity within communities, the policies within the London Plan may not include sufficient infrastructure to provide for future population growth within Tower Hamlets. Therefore, resulting in minor positive effects.</p>	+
IIA2: Human Health	<p>A number of policies within the existing Local Plan will indirectly contribute to improving the health of residents within the Borough through encouraging healthy lifestyles. Policy S.SG1 also includes supporting the delivery of new healthcare facilities, providing for current and future residents of Tower Hamlets.</p> <p>The Plan also includes policy D.SG3 (Health Impact Assessments) which aims to ensure development contributed to a healthy built environment. The policy also requires the enhancement of positive impacts of development and mitigation of negative impacts.</p> <p>The development of new health infrastructure and promotion of healthy communities, alongside Health Impact Assessments, results in significant positive effects.</p>	++	<p>Policy GG3 identifies the need for new developments to assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.</p> <p>The Plan also sets out policies for the provision of housing (Chapter 4), the protection and provision of community facilities, education and health care (S2, S3, GG3), the provision and protection of sports facilities and open spaces (S5, S11), and healthy streets (T2).</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the health and wellbeing in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects.</p>	+
IIA3: Economy	<p>There are a number of policies within the Plan that will contribute to growing the economy in Tower Hamlets. This includes those policies within Chapter 10 (delivering economic growth) and Chapter 11 (revitalising our town centres). The development of policies within these chapters include the chapter policy D.CF4 (public houses), and a number of policies to preserve and enhance the vitality of town centres within Tower Hamlets.</p> <p>The revitalisation of town centres is likely to encourage users into these areas and encourage economic growth within the Borough. Additionally, the preservation of unique high streets such as Columbia Road and Redchurch Street contribute to enhancing the diversity of Tower Hamlets economy. However, since the Covid-19 pandemic, and a rise in interest rates, the economy has changed significantly. Therefore the developments proposed may not reflect the current economic needs of these areas. Minor positive effects are therefore identified.</p>	+	<p>Policy GG5 aims to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners.</p> <p>There are also a number of strategies within the London Plan, namely those within Chapter 6 (Economy) such as E1, E8, E2, and E3 that contribute to improving economic growth and business investment within London.</p> <p>However, since the Covid-19 pandemic, the economy has changed significantly, and the London may not be robust enough to address these issues. Effects are therefore limited to minor positive effects.</p>	+

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
IIA4: Employment	<p>The following policies within the existing Local Plan contribute to employment improvements within the Borough; S.EMP1 (creating investment and jobs), D.EMP2 (new employment space), D.EMP3 (loss of employment space), and D.EMP4 (re-development within designated employment areas).</p> <p>The development of additional employment space provides new opportunities for jobs within the Borough for current and future populations. Additionally, the development of new, and redevelopment of existing, employment spaces may provide a range of workspaces for businesses of varying sizes, providing a diverse range of job opportunities.</p>	+	<p>Policy GG5 plans for sufficient employment and industrial space in the right locations to support economic development and regeneration. The London Plan proposes Growth Corridors and Opportunity Areas which are described as large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility. There is one opportunity area located in Tower Hamlets, the Isle of Dogs.</p>	+
IIA5: Housing	<p>All policies within Chapter 9 of the existing Local Plan improve housing within the Borough, including housing standards. Policy S.H1 (meeting housing needs) outlines the delivery of at least 58,965 new homes across the borough (3,931) per year up to 2031. Within this new housing is a required provision of affordable housing and different housing types. This contributes to supplying housing that fits the needs of residents within the borough, for example, single occupancy rental accommodation.</p> <p>Policy D.H4 also includes measures for specialist housing, including the preservation of existing housing and the development of new specialist housing. Additional policies such as D.H5 (gypsies and travellers accommodation) and D.H6 (student housing) support the needs of a number of groups inclusively.</p> <p>However, as the population of Tower Hamlets is anticipated to grow by 8.4%, the outlined provision of housing may not support the needs of the growing population. Minor positive effects are therefore identified.</p>	+	<p>The London Plan 2021 identifies a 10-year minimum housing supply target of 34,730 homes within the borough over the period 2019/20 to 2028/29. This is equivalent to a minimum requirement of 3,473 homes per year. This is likely to help increase the supply within the borough. A number of policies, including H1, H4, H6 and H7 include the provision of increased and affordable housing, supporting housing requirements within London.</p> <p>The requirement of 50% of all new homes delivered across London to be genuinely affordable, will also help more people access housing and could help to reduce levels of housing deprivation. Policies also support specialist housing for older people (H13), gypsy and traveller accommodation (H14) student accommodation (H15) and shared living (H16), supporting good development to meet the needs of a number of groups inclusively.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting housing in Tower Hamlets, however they may be too strategic in implementation and lack a local approach, this has therefore resulted in minor positive effects.</p>	+
IIA6: Crime and Safety	<p>There is no specific policy within the existing local plan that addresses crime within Tower Hamlets. However, policy D.DH2 (attractive streets, spaces and public realm) does include prime prevention security measures that should be included within developments.</p> <p>The lack of policy relating to crime within the Borough has resulted in significant negative effects.</p>	--	<p>The London Plan does not benefit from a standalone policy on crime and safety; however it is an underlying theme in a number of policies such as supporting the night time economy (HC6) building strong and inclusive communities (GG1) and Safety, security and resilience to emergency (D11).</p> <p>Given the rising crime rates across London, the Plan does not adequately address these issues. Policies are unlikely to significantly address crime within Tower Hamlets, therefore minor negative effects have been identified.</p>	-
IIA7: Transport	<p>Policies within Chapter 16 of the existing Local Plan address travel within the Borough. Policy S.TR1 includes the provision of sustainable travel modes, including walking and cycling. However, the policy does not include detailed measures to address the significant issues on the highway network, including congestion. The policies also try to limit disruptions to the transport network where possible.</p> <p>However, the application of these policies across Tower Hamlets does not include additional new infrastructure to improve transport measures.</p>	+/-	<p>The London Plan sets out measures to meet the Mayor's target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. Policies set out in Chapter 10 set out ways in which to reduce the need to travel for both existing and future developments. The Plan also sets out the ambitions of Crossrail 2 and the opportunities this may bring to Tower Hamlets.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting sustainable transport in Tower Hamlets and has therefore resulted in significant positive effects.</p>	++

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
IIA8: Accessibility	<p>There is no specific policy within the existing Local Plan that addresses accessibility of public transport from all social groups. However, policy S.TR1 (sustainable travel) includes indirect effects on accessibility through encouraging accessible public and active travel modes.</p> <p>The Borough is generally well connected through public transport. However, as with the transport policies, the Plan does not include specific implementation measures to ensure accessibility across the Borough.</p>	+/-	<p>Policies within Chapter 10 (Transport) aim to improve the public transport within London. Within this, measures are outlined in order to preserve accessibility for all groups, including disabled and low income users. This also includes the availability for disabled parking spaces.</p> <p>However, these policies have not specifically outlined measures of improving accessibility within Tower Hamlets. Therefore it is likely that accessibility to transport and spaces within the Borough will be preserved, but improvements are less likely to reflect the needs of the population. Therefore minor positive effects have been identified.</p>	+
IIA9: Biodiversity and Natural Capital	<p>Chapter 13 within the existing local plan includes policies that enhance open spaces within Tower Hamlets (S.OWS1, S.OWS2, D.OWS3, D.OWS4). These policies help to enhance biodiversity and protect open space within the Borough, including Metropolitan Open Land. This also includes improving the quality of open spaces in line with the Local Biodiversity Action Plan.</p>	+	<p>There are a number of policies within the London Plan that support the protection, enhancement and net gain in biodiversity (specifically G5, G6, G7, GG2, D8). The London Plan also includes a supplementary design guide (Urban Greening for Biodiversity Net Gain: A Design Guide¹⁷) which sets out ways in which biodiversity net gain can be achieved through new developments.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on biodiversity. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of biodiversity. Both positive and negative effects have therefore been identified.</p>	+/-
IIA10: Landscape and Townscape	<p>There are a number of policies (namely, S.DH1, D.DH2, D.DH6, and D.DH10) that improve the landscape and townscape of Tower Hamlets through high quality design, attractive streets, spaces and public realm; enhancing the townscapes within Tower Hamlets. Additionally, Policy S.OWS1 (Creating a network of open spaces) contributes to preserving the landscape within Tower Hamlets, including the open space and MOL within the Borough. Policy S.DH4 (Shaping and managing views) also contributes to the enhancement and protection of the Tower Hamlets views and landscape, enhancing the public realm.</p> <p>Preserving and enhancing the local landscape and townscape contributes to high quality streetscapes within the Borough and improves the current condition of the landscape and townscape. Significant positive effects are therefore identified.</p>	++	<p>The London Plan understands the pivotal role that the City's unique landscape and townscape plays in shaping its character and sense of place. The plan does not benefit from one specific landscape policy; however, it does underpin a number of policies such as D8, HC1, HC3, G1, G3 and G9. These are aimed at improving the historic and natural environment, which in turn will benefit the landscape and townscape.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on landscape and townscape. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of the local landscape and townscape. Both positive and negative effects have therefore been identified.</p>	+/-
IIA11: Historic Environment	<p>Policies S.DH3 (heritage and the historic environment) aims to preserve and enhance the Borough's designated and non-designated heritage assets, including</p>	+	<p>Chapter 7 of the London Plan sets out heritage and culture policies which aim to sensitively management London's heritage assets, whilst design policies aim to</p>	+/-

¹⁷ London Wildlife Trust, Mayor of London, Urban Greening for Biodiversity Net Gain: A Design Guide [online] available at: https://www.london.gov.uk/sites/default/files/urban_greening_and_bng_design_guide_march_2021.pdf

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
	<p>archaeology and parks and gardens. Additionally, Policy S.DH5 (world heritage sites) safeguards the world heritage sites within the Borough (the Tower of London and Maritime Greenwich). This preserves the sites within the Borough and aims to enhance them where possible through development.</p> <p>However, the policies do not consider heritage at risk assets. Therefore minor positive effects are identified.</p>		<p>avoid harm to, the significance of London’s heritage assets and their settings. These could help to preserve and enhance the borough’s heritage assets.</p> <p>The London Plan does set out plans for new developments and has set out a housing target of 34,730 new homes by 2028/29. This could lead to significant levels of development which have potential for negative effects on the historic environment. Some of these effects may be temporary during construction, but without a local approach, some sites could result in the loss and degradation of the historic environment. Both positive and negative effects have therefore been identified.</p>	
IIA12: Flooding	<p>Policy D.ES4 (flood risk) aims to restrict development that is located within flood zone 3a (high risk of flooding). The policy also requires a flood risk assessment for developments that are located within flood zone 2 or 3a. In addition to this, flood risk management measures are required within developments in order to mitigate flood risk from the River Thames and River Lea. Additionally, Policy D.ES5 (sustainable drainage) outlines measures to reduce the risk of surface water flooding and achieve specific run-off rates. However, the policies do not outline specific measures that should be included within developments to minimise flood risk.</p>	+	<p>Policy SI 12 (flood risk management) and SI 13 (sustainable drainage) aim to minimise and mitigate flood risk from developments. The implementation of these policies within Tower Hamlets is likely to contribute to reducing flood risk and be sufficient in minimising flood risk as a result of new developments.</p>	+
IIA13: Water Quality	<p>Policy D.ES6 (sustainable water and wastewater management) outlines reductions in water consumption as part of new developments (maximum of 105 litres per person per day). Additionally, developments should meet BREEAM water efficiency credits. There is also a requirement for new developments to minimise pressure on the combined water network.</p> <p>However, despite preserving water resource, this policy does not enhance water quality. Mixed positive and negative effects have therefore been identified as the existing Local Plan may be insufficient in supporting the preservation and enhancement of water quality within the Borough.</p>	+/-	<p>There are a number of policies within the London Plan that aim to protect and enhance the water environment. Most significantly is Policy SI 17 which explicitly aims to protect and enhance London’s waterways. This aims for new developments to support river restoration including opportunities to improve water quality.</p> <p>Additionally Policy SI 5 (water infrastructure) states that new development should promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, whilst Policy SI 13 (sustainable drainage) states that drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.</p> <p>The application of the London Plan policies is likely to be sufficient in supporting the efficient use of land in Tower Hamlets and has therefore resulted in significant positive effects.</p>	++
IIA14: Air Quality	<p>Policy D.ES2 (Air quality), specifically, requires development to meet or exceed the ‘air quality neutral’ standard, including promoting the use of low or zero emission transport and reducing the reliance on private motor vehicles. The aim of this policy is to improve the Borough’s air quality.</p> <p>Additionally, the acknowledgement of required air quality improvements within the plan are likely to contribute to mitigating poor air quality where possible. The application of this plan is likely to be sufficient in tackling air pollution in the Borough.</p>	++	<p>Policy SI 1 (improving air quality) sets out a key criteria for dealing with poor air quality within the city. It states that new developments must not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or create unacceptable risk of high levels of exposure to poor air quality.</p> <p>The cross cutting nature of air quality is acknowledged within the plan, as it features in other policies such as creating a health city (GG3) public realm (D8) and protecting and enhancing London’s waterways (SI17). Policies that support a reduce need to travel and encourage an increase in walking and cycling will also benefit this objective.</p>	++

IIA Objective	Application of Existing Local Plan Summary of Effects	Sig.	Application of London Plan Summary of Effects	Sig.
			The application of the London Plan policies is likely to be sufficient in tackling air pollution in Tower Hamlets and has therefore resulted in significant positive effects.	
IIA15: Climate Change	Policy D.ES10 (overheating) and D.ES4 (flood risk) are likely to contribute to positive effects as these policies indirectly. Climate change is likely to result in increased warming and flood events, as well as presenting an increased water requirement. Therefore, these policies are likely to help address the chronic and acute effects of climate change.	+	Policy GG6 (increasing efficiency and resilience) aims to help London become a more efficient and resilient city. This will ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect.	+
IIA16: Greenhouse Gases	Policies within the existing Plan acknowledge the need to reduce greenhouse gases and emissions within the Borough. Specifically, Policy D.ES7 (a zero carbon borough) includes measures to reduce carbon-dioxide emissions on sites within Tower Hamlets, including within residential and non-residential developments. However, the Plan does not include measures for localised improvements across the borough, including additional emitters. Mixed positive and negative effects are therefore identified.	+/-	Policy SI 2 (minimising greenhouse gas emissions) states that all new major development should be net zero-carbon, by reducing GHGs in operation and minimising both annual and peak energy demand in accordance with an energy hierarchy. However, the London Plan is working towards becoming a net zero city by 2050, which is 12 years longer than the council's ambition of 2038. Without localised initiatives it's unlikely that the London Plan will help to reach the Council's net zero ambitions, resulting in minor negative effects.	-
IIA17: Waste	There are three policies within the existing Plan that contribute to reducing waste within the Borough (S.MW1, D.MW2, and D.MW3). These policies aim to manage and minimise the waste within Tower Hamlets, identifying a need for waste reduction, and suitable waste facilities. Additionally, new waste facilities will be designed to contribute towards sustainable waste management in line with the Waste Hierarchy.	+	Policies SI 7 (reducing waste and supporting the circular economy) and SI 8 (waste capacity and net waste self-sufficiency) identify the needs for waste reduction and sustainability within London. This will aim to reduce waste and promote circular economy principles within London, managing waste and minimising where possible. Additionally, Policy SI9 (safeguarded waste sites) ensures the protection of London's waste sites.	+
IIA18: Efficient use of Resources	Whilst the Plan does not include a specific policy in reference to the efficient use of resources, including land, other policies are designed to indirectly positively affect resources. Policy S.SG1, as well as other policies, includes specification to utilise brownfield sites within the Borough. The plan also seeks to utilise circular economy principles, reusing and recycling construction materials where possible (policy S.MW1, managing our waste).	+	The London Plan includes Policy GG2 which supports making the best use of land. This aims to enable development on brownfield land, avoid development on greenbelt land and MOL and where appropriate intensify development to make the best use of available site. Policy H1 (increasing housing supply) also aims to optimise the potential for housing delivery on all suitable and available brownfield sites. The application of the London Plan policies is likely to be sufficient in supporting the efficient use of land in Tower Hamlets and has therefore resulted in significant positive effects.	++

7 Assessment of Site Allocations

7.1 Introduction

- 7.1.1. The assessment of the Local Plan sites is summarised below and presented in full in **Appendix G**. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 7-1** below.
- 7.1.2. **Table 7-2** overleaf provides an overview on the performance of the Local Plan policy themes against each IIA objective and **Table 7-3** outlines significant effects based on each IIA objective. For the purpose of the IIA, significant effects are deemed to be the following:
- Significant Positive effects;
 - Significant Negative effects; and
 - Uncertain effects.
- 7.1.3. Further details on the insignificant effects i.e., minor positive, minor negative, mixed and neutral effects are detailed in **Appendix G**. The Appendix also sets out the nature of effects such as magnitude, spatial extent and duration. It should be noted that those effect recorded below are pre-mitigated effects. Details on the specific mitigation measures are included in **Appendix G**, which includes the application of proposed draft policies.

Table 7-1 – Significance of Effect

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0

7.2 Proposed Site Allocations – Summary of Effects

Table 7-2 provides an overview on the performance of the Local policy themes against each IIA objective and Table 7-3 outlines significant effects based on each IIA objective.

Table 7-2 – Overview of Proposed Site Allocations

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Bishopsgate Goods Yard	++	++	++	++	++	+	+	++	++	+/-	+/-	0	0	+/-	+	+/-	?	+
London Dock	++	++	++	++	++	+	+	++	++	+	+/-	-	0	+/-	?	?	?	+
Marian Place Gasworks and the Oval	++	++	++	++	++	+	++	++	+/-	+/-	+/-	0	0	+/-	+	+	?	+
Whitechapel South	+	++	++	++	++	?	+	+	++	+/-	+/-	0	0	+/-	-	+/-	?	+
London Metropolitan University	?	?	?	?	?	?	+	+	+	+/-	+/-	0	0	+/-	-	?	?	+
Whitechapel North	++	++	++	++	++	?	+	+	?	?	?	0	0	+/-	-	?	?	+
Brick Lane and Pedley Street	+	+	++	++	+	?	+	+	-	+/-	+/-	0	0	+/-	-	?	?	+
Bow Common Lane	+/-	+	++	++	++	+	+	++	+/-	+	-	+	+	+/-	+/-	?	?	++
Chrip Street	++	++	++	++	+	+	+	+	+	+	+	?	+	-	+	+/-	?	+
Ailsa Street	++	++	?	+	++	+	+	+	+/-	+	+/-	-	+/-	+/-	+	+/-	?	+
Leven Road	++	++	+	+	++	+	-	+	+/-	++	+/-	-	+/-	+/-	+	+/-	?	+

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Aberfeldy Estate	++	++	++	++	+	+	-	+	++	++	+	--	?	+/-	-	?	?	+
Bromley by Bow	++	++	+	+	+	+	++	++	+/-	+/-	-	--	?	+/-	-	?	?	+
Blackwall Trading Estate and Leamouth Road Depot	+	++	?	?	+	+	+	+	+/-	+/-	+/-	--	?	+/-	-	?	?	+
Hackney Wick Station	++	++	++	++	++	+	++	++	+/-	+	+	--	?	+/-	-	?	?	++
Hepscott Road	++	++	++	++	++	+	+	+	++	+/-	+/-	--	?	+/-	+	?	?	+
Sweetwater	++	++	++	++	++	+	++	++	+/-	++	+	--	?	+/-	+	?	+	++
Teviot Estate	++	++	+	+	+	+	?	+	?	+	+/-	--	?	+/-	-	?	?	+
Aspen Way	++	+	+	++	+	?	++	+	+	++	+/-	-	0	+/-	-	?	?	+
Billingsgate Market	+	?	+/-	+	+	+	+	++	-	+/-	+/-	-	-	+/-	-	?	?	+
Crossharbour	++	++	++	+	?	+	+	++	+/-	+/-	+/-	--	-	+/-	-	?	?	+
Limeharbour	+	+	+/-	++	?	+	+	+	+/-	+/-	+/-	--	-	+/-	+	+	?	+
Marsh Wall East	++	++	+	++	++	+	+	++	+/-	+/-	+/-	--	-	+/-	+	+	?	+

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Marsh Wall West	+	++	+/-	++	++	+/-	+	++	+/-	+/-	+/-	?	+/-	+/-	+	+	?	+
Millharbour	++	+	++	++	+/-	+	+	+	+/-	+/-	+/-	?	+/-	+/-	-	+	?	+
North Quay	+	++	++	++	+	++	++	++	+/-	+/-	+/-	-	-	+/-	+	+	?	+
Reuters	+	+	++	+	++	+/-	++	++	+/-	+/-	+/-	-	-	+/-	-	?	?	+
Riverside South	++	++	+	++	?	+	+	++	+/-	+/-	+/-	-	-	+/-	?	?	?	+
Westferry Printworks	+	+	+	+	?	+	-	+	+/-	+/-	+/-	-	-	+/-	?	?	?	+
Wood Wharf	++	++	+	++	+	+	++	++	+/-	+/-	+/-	+	+/-	+/-	+	+	?	+
10 Bank Street	+	+	+	+	+	+	+	+	-	+/-	?	-	-	+/-	+/-	?	?	?
Westferry/Park Place	+	+	?	?	+	+	+	+	-	+/-	--	--	-	+/-	+/-	?	?	?

Table 7-3 – Summary of Significant Effects

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA1: Population & Equalities	19	0	1	<p>Significant positive effects have been identified for 19 proposed sites. Generally, these sites provide at least 500 new homes per site, including 40% affordable homes and the development of wheelchair adaptable homes. In addition, these sites provide additional retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. These sites also have good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.</p> <p>Uncertain effects have been identified for the London Metropolitan University site as these units will only benefit only benefit students and the delivery may compromises the ability to deliver other priorities, in particular affordable housing and facilities which will benefit the wider community. However, the introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
IIA2: Human Health	21	0	2	<p>Significant positive effects have been identified for 21 proposed site allocations. These sites all provide a housing provision improving health and have the potential to include new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. These sites will reduce levels of health inequalities and provide new facilities, improving physical and mental health and wellbeing and reduce levels of loneliness. They will ensure that the needs of all groups will be met both now and in the future.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Uncertain effects have been identified for two sites – Billingsgate Market and London Metropolitan University. Generally, these sites have existing good access to health services, however there are high levels of health deprivation. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	16	0	3	<p>Significant positive effects have been identified for 16 sites. These sites are well located close to existing town centres and include additional retail development spaces. Generally, this also includes public realm improvements at the ground and platform level. These sites will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p> <p>Uncertain effects have been identified for three proposed sites (London Metropolitan University, Ailsa Street and Blackwall Trading Estate). Generally, the details of these developments are currently unknown. However, there could be potential to provide a mixed-use development which may include retail offering, helping to improve the viability of the town centre.</p>
IIA4: Employment & Skills	20	0	2	Significant positive effects upon employment have been identified for 20 sites. Generally, this is where sites are well located close to existing employment areas, such as the City Fringe Activity Area, Central Activity Zone, or Isle of Dogs Activity Area. These sites are also likely to include employment space as well as retail. This will likely increase employment opportunities.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Uncertain effects have been identified for two proposed sites (London Metropolitan University and Blackwall Trading Estate). The details of these developments are currently unclear. However, there is potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve employment opportunities.
IIA5: Housing	14	0	5	<p>Significant positive effects have been identified for 14 sites. Generally, these sites all provide at least 500 homes per site, helping towards meeting LBTH's housing target. These sites also include at least 35% affordable homes, including wheelchair accessible homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.</p> <p>Uncertain effects have been identified for five sites (London Metropolitan University, Limeharbour, Crossharbour, Riverside South and Westferry Printworks). Generally, this has been attributed where limited information is currently known on the affordability, accessibility, size, type and tenure of homes.</p>
IIA6: Crime & Safety	1	0	5	<p>The majority of sites have resulted in minor positive effects upon crime and safety. This has been detailed in full in Appendix G.</p> <p>One site has resulted in significant positive effects upon crime and safety (North Quay). This site is expected to deliver improvements to public realm and active frontages. This is likely to improve natural surveillance within the site and in turn</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				<p>improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles.</p> <p>Uncertain effects have been identified for five sites (Whitechapel South, London Metropolitan University, Whitechapel North, Brick Lane and Pedley Street, and Aspen Way). It is currently unclear if designing out crime principles will be applied as part of these developments. However, developing these sites from their existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.</p>
IIA7: Sustainable Transport	8	0	1	<p>The majority of sites have resulted in minor positive effects upon sustainable transport. This has been detailed in full in Appendix G.</p> <p>Significant positive effects have been identified for eight sites (Marian Place Gasworks and the Oval, North Quay, Wood Wharf, Reuters and Bromley by Bow). These sites generally have very good access to sustainable transport modes, and high PTAL scores of between 4 and 6a. These sites also include the development of improved cycle and pedestrian access.</p> <p>Uncertain effects have been identified for one site (Teviot Estate) as this site has average access to public transport and it is not clear whether additional sustainable transport will be included within the development of the site.</p>
IIA8: Accessibility	15	0	0	<p>The majority of sites have resulted in minor positive effects upon accessibility. This has been detailed in full in Appendix G.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				Significant positive effects have been identified for 15 sites. Generally, these sites have existing good access to transport facilities and services and include the provision for additional improvements to accessibility, including active travel permeability and improvements to wayfinding.
IIA9: Biodiversity & Natural Capital	5	0	2	<p>Five sites have resulted in significant positive effects due to their regard for biodiversity and inclusion of green infrastructure and landscaping, which are expected to provide a significant net gain in biodiversity.</p> <p>The Whitechapel North and Teviot Estate resulted in uncertain effects upon biodiversity as it is currently uncertain whether these sites will have adverse effects on local habitats, or if the sites will meet the required 30% net gain as set out within the Local Plan.</p>
IIA10: Landscape & Townscape	4	0	1	<p>Four sites have resulted in significant positive effects upon landscape and townscape (Sweetwater, Aberfeldy Estate, Teviot Estate and Leven Road). Generally, these sites will have a positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area. Active frontages and green landscapes may also be created and maintained.</p> <p>The Whitechapel North site has resulted in uncertain effects as at this stage the design details of developments are unknown, however, it is assumed that the developments may improve townscape and landscape setting.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA11: Historic Environment	0	1	2	<p>Significant negative effects on the historic environment have been identified for the Westferry/Park Place site. This site is located in close proximity to a number of heritage assets, including archaeological priority areas, conservation areas, and a Grade 2 listed gate. There is potential for the loss of the Grade 2 listed gate and buried archaeology as a result of development at this site.</p> <p>Uncertain effects have been identified for two sites (10 Bank Street and Whitechapel North). Generally, there is potential for these sites to temporarily adversely affect local heritage assets. However, design details are currently unclear and there is potential for enhancements to the public realm which may improve the setting of the local historic environment.</p>
IIA12: Flooding	0	12	3	<p>In total 12 sites have resulted in significant negative effects for flooding. These sites are all located within areas of flood zone 3 and flood risk areas and there are no detailed flood risk mitigation measures outlined for the developments at this stage.</p> <p>Three sites (Chrisp Street, Marsh Wall West and Millharbour) have resulted in uncertain effects on flooding. These sites are located within flood risk areas and it is currently unclear whether these sites will include flood risk mitigation measures.</p>
IIA13: Water Quality	0	0	7	<p>Uncertain effects upon water quality have been identified for seven sites, which are located within close proximity to watercourses. It is currently unclear if any measures to mitigate against water quality impacts will be included within development.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA14: Air Quality	0	0	0	All proposed site allocations have resulted in mixed positive and negative effects upon air quality. This has been detailed in full in Appendix G .
IIA15: Climate Change & Resilience	0	0	3	Three sites (Mariane Place Gasworks and the Oval, Riverside South, and Westferry Printworks) have resulted in uncertain effects on climate change and resilience. Generally, these sites have low overall climate and heat risks, and have some resilience to climate change. However, not all climate resilience measures are known at this stage.
IIA16: GHG Emissions	0	0	20	Uncertain effects have generally been identified for 20 sites where there is potential for significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. However, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
IIA17: Waste	0	0	31	The majority of sites have resulted in uncertain effects on waste. Demolition, excavation, and construction are likely to result in the generation of a significant amount of waste. However, at this stage it is not clear if existing buildings and structures will be re-used or recycled and whether recycled materials will be supported as part of construction.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA18: Efficient use of Land and Resources	3	0	2	<p>The majority of sites have resulted in minor positive effects upon efficient use of land and resources. This has been detailed in full in Appendix G.</p> <p>Three sites (Sweetwater, Hackney Wick Station, and Bow Common Lane) have resulted in significant positive effects on land use. These sites are on previously developed land and will support high density housing and mixed-use development which will help to make the best use of the land within the Borough.</p> <p>Uncertain effects have been identified for two sites (10 Bank Street and Westferry/Park Place). These sites are predominantly on previously developed land, however the density of housing is not currently known nor is it clear whether sustainable use of materials will be encouraged.</p>

7.3 Alternative Site Allocations

- 7.3.1. The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the draft plan. Without this, there cannot be a proper environmental evaluation of the preferred plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.
- 7.3.2. The proposed site alternatives include those sites that are developable but do not meet the 500 minimum capacity targets of the proposed site allocations. There are 12 sites in total. These sites have the potential to come forward as windfall sites in the future if the proposed site allocations above do not provide adequate housing numbers. The sites have therefore, been assessed in the same level of details as the proposed allocations and the summary of effects is presented below.

7.4 Summary of Effects – Alternative Allocations

- 7.4.1. The assessment of alternative sites has resulted in a higher proportion of significant negative effects compared to the proposed site allocations and are less likely to sustainably support development. These effects have been identified for IIA15 (climate change and resilience), IIA12 (flooding), IIA11 (historic environment), IIA8 (accessibility), and IIA7 (sustainable transport).
- 7.4.2. Generally, sites that are located within flood zone 3 have resulted in significant negative effects upon IIA12 (flooding). Similarly, sites located within flood zone 3 and that have high climate and heat risks have resulted in significant negative effects on IIA15 (climate change and resilience).
- 7.4.3. Additionally, a small number of sites have the potential to result in damage or loss of heritage assets located in the site boundaries (IIA11). Significant negative effects have been identified for these sites.
- 7.4.4. Minor negative effects have also been identified where schemes are located in close proximity to priority habitats (IIA9). Development here is likely to result in disturbance to these habitats and species within them.
- 7.4.5. There are a larger proportion of uncertain effects associated with alternative sites when compared to preferred sites. This has largely been identified for IIA1 (population and equalities), IIA2 (human health), and IIA5 (housing) where it is currently unclear what the provision of homes at sites will entail, including the number of homes, affordability and adaptability of homes.
- 7.4.6. A number of uncertain effects have also been identified across IIA objectives where the nature of development at sites is currently unclear, and the provision of additional services is unknown.

Table 7-4 – Overview of Alternative Allocations

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Neptune Wharf	?	?	?	+	?	?	?	+	?	+	?	?	?	+/-	?	?	?	+
Hamlet Industrial Estate	+/-	?	?	?	+/-	?	?	+	?	?	?	--	?	+/-	--	?	?	+
Millharbour South	+	++	+	++	?	+	+/-	+	?	+	+/-	-	?	+/-	--	?	?	+
Orchard Wharf	?	?	+	?	?	+	--	--	-	+/-	+/-	--	?	+/-	?	?	?	+
Tobacco Dock	?	?	+	+	?	+	+	+	?	+/-	--	--	0	+/-	--	?	?	+
Canada Square/Churchill Place	?	?	+	+/-	?	?	-	+	0	-	-	--	?	+/-	+/-	?	?	+/-
London Chest Hospital	?	?	?	?	?	+	+	+	?	+/-	--	0	?	+/-	+/-	?	?	+
LEB Building	?	?	+	?	?	+	+	+	?	+/-	+/-	0	0	+/-	+/-	?	?	+
72-90 Crisp Street	?	?	+	+	?	+	+	+	0	+/-	+/-	--	0	+/-	--	?	?	+
Tower Hamlets Car Pound	?	?	+	?	?	+	+	+	?	+/-	+/-	0	0	+/-	?	?	?	+
Anchor Retail Park	+/-	?	-	+/-	-	?	+	+	0	?	-	0	0	+/-	+/-	?	?	+/-
Republic Estate	+/-	?	+/-	+/-	-	?	-	?	0	?	-	0	0	+/-	+/-	?	?	+/-

Site Name	IIA1: Population & Equalities	IIA2: Human Health	IIA3: Economy & Town Centres	IIA4: Employment & Skills	IIA5: Housing	IIA6: Crime & Safety	IIA7: Sustainable Transport	IIA8: Accessibility	IIA9: Biodiversity & Natural Capital	IIA10: Landscape & Townscape	IIA11: Historic Environment	IIA12: Flooding	IIA13: Water Quality	IIA14: Air Quality	IIA15: Climate Change & Resilience	IIA16: GHG Emissions	IIA17: Waste	IIA18: Efficient use of Land and Resources
Watney Market	?	?	?	?	?	?	+	+	?	?	?	0	0	+/-	?	?	?	?
Devons Road	+	?	+	?	?	+	+	+	-	+/-	+/-	0	0	+/-	+/-	?	?	+
Hertsmere House	?	?	+	+	?	?	-	+	-	?	+/-	--	0	+/-	+/-	?	?	+
Samuda Estate	?	?	?	?	?	?	?	+	-	?	?	--	-	+/-	--	?	?	?

Table 7-5 – Summary of Significant Effects – Site Alternatives

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA1: Population & Equalities	0	0	10	Alternative sites have largely resulted in uncertain effects on population and equalities. Generally, these uncertain effects have been attributed where the provision of homes does not meet the borough’s housing target and there are uncertainties surrounding site developments. These uncertainties include how many housing units will be affordable and adaptable, and whether additional community facilities will be provided at the site.
IIA2: Human Health	1	0	15	<p>The Millharbour South alternative site has resulted in significant positive effects on human health. The site is well connected to healthcare and community facilities, and is likely to lead to additional community facilities and open spaces, improving health and wellbeing of the local community.</p> <p>Uncertain effects have been identified for 15 alternative sites. Generally, this is as there is potential for the site to increase pressure on existing healthcare and community facilities and it is unclear if additional provisions will be included within development.</p>
IIA3: Economy & Town Centres	0	0	4	<p>The majority of alternative site allocations have resulted in minor positive effects on economy and town centres, this is detailed in full in Appendix G.</p> <p>Four site alternatives have resulted in uncertain effects on economy and town centres (Neptune Wharf, Hamlet Industrial Estate, London Chest Hospital and Watney Markey). There is potential for these sites to include mixed-use</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				development, providing employment and/or retail space. However, this is currently uncertain.
IIA4: Employment & Skills	1	0	8	<p>Millharbour South has resulted in significant positive effects on employment and skills. The site is well located close to employment opportunities, and the area is amongst the 30-50% most deprived areas. The site also has the potential to include additional employment opportunities. Therefore, providing improved opportunities for employment.</p> <p>Uncertain effects have been identified for eight sites. These sites are generally within good access to existing employment areas, however, there is potential for the inclusion of additional employment facilities within the proposed sites although this is currently unclear.</p>
IIA5: Housing	0	0	12	Thirteen alternative sites have resulted in uncertain effects on housing. This has been attributed where housing provisions fall below the borough's targets and the affordability, accessibility, size, type and tenure of homes is unclear.
IIA6: Crime & Safety	0	0	8	Eight alternative sites have resulted in uncertain effects upon crime (Neptune Wharf, Hamlet Industrial Estate, Canade Square/Churchill Place, Anchor Retail Park, Republic Estate, Watney Market, Hertsmere House, and Samuda Estate). These sites have limited detail as to whether designing out crime principles will be applied as part of developments, or whether there will be improvements to the public realm.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA7: Sustainable Transport	0	1	3	<p>Orchard Wharf has resulted in significant negative effects upon sustainable transport. The site is not well located for public transport use and has a PTAL score of between 0 and 1b. This is likely to increase the need for residents to travel by car to access local services and facilities. It is also unclear if any additional public transport provision will be proposed as part of the site.</p> <p>Uncertain effects have been identified for Neptune Wharf, Samuda Estate and Hamlet Industrial estate. Despite these sites having a PTAL score of 2, and access to public transport, it is unclear if improvements to sustainable transport access will be included within development.</p>
IIA8: Accessibility	0	1	1	<p>Orchard Wharf has resulted in significant negative effects upon accessibility as the site has a PTAL score of between 0 and 1b. Therefore, there is potential for the exclusion of social groups who rely on public transport.</p> <p>Republic Estate has resulted in uncertain effects as the site has average access to facilities and service. However, at this stage it is not known if any accessible provision will be included as part of the site.</p>
IIA9: Biodiversity & Natural Capital	0	0	8	<p>Eight sites have resulted in uncertain effects on biodiversity. None of the alternative sites will result in the direct loss of habitats, but they could disturb nearby sites, habitats and species. At this stage, no details have been provided on the provision of green infrastructure and/or open space which could enhance biodiversity, or whether BNG targets will be met on site.</p>

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA10: Landscape & Townscape	0	0	6	Hamlet Industrial Estate, Anchor Retail Park, Watney Market, Hertsmere House, Samuda Estate and Republic Estate have all resulted in uncertain effects on landscape and townscape. They are located in areas which have low landscape and townscape values, but currently, the design details for these sites are unknown and whether there will be any inclusion of green spaces or significant enhancements to the public realm.
IIA11: Historic Environment	0	2	4	<p>Both Tobacco Dock and London Chest Hospital have resulted in significant negative effects upon the historic environment. Both these sites have the potential to disturb local heritage assets, and result in the loss of heritage assets as a result of development at these sites.</p> <p>Uncertain effects have been identified for Neptune Wharf, Watney Market, Samuda Estate and Hamlet Industrial Estate as these at this stage it is not clear whether development will include measures to enhance and restore the local historic environment, or whether sensitive design will be implemented.</p>
IIA12: Flooding	0	7	1	Seven alternative sites have resulted in significant negative effects upon flooding (Hamlet Industrial Estate, Orchard Wharf, Tobacco Dock, Canada Square/Churchill Place, 72-90 Chrisp Street, Hertsmere House and Samuda Estate). These sites are all located within areas of flood zone 3 and flood risk areas, and there are no detailed flood risk mitigation measures outlined within the developments at this stage.

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
IIA13: Water Quality	0	0	6	Uncertain effects upon water quality have been identified for a number of sites located near to water bodies as it is currently unclear if any measures to mitigate against water quality impacts will be included within development. There is potential that surface water runoff from construction could affect water quality.
IIA14: Air Quality	0	0	0	No alternative sites have resulted in significant or uncertain effects upon air quality. All alternative sites have resulted in mixed positive and negative effects upon air quality, detailed in Appendix G .
IIA15: Climate Change & Resilience	0	5	4	<p>Five sites have resulted in significant negative effects upon climate change and resilience (Hamlet Industrial Estate, Millharbour South Tobacco Dock, Samuda Estate and 72-90 Chrisp Street). Generally, these sites all have medium-high or high overall climate risk and heat risk ratings as well as being at risk of flooding meaning that they have a diminishing resilience to climate change. No climate resilience measures are known at this stage.</p> <p>Four sites have resulted in uncertain effects on climate change and resilience (Neptune Wharf, Orchard Wharf, , Tower Hamlets Car Pound and Watney Market). Generally, these sites have low overall climate and heat risks, and have some resilience to climate change. However, not all climate resilience measures are known at this stage.</p>
IIA16: GHG Emissions	0	0	16	All alternative sites have resulted in uncertain effects upon GHGs. For all developments, there are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as

IIA Objective	Number of Significant Effects			Summary of Significant Effects
	++	--	?	
				carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether developments will utilise renewable energy sources or low carbon heat networks once operational.
IIA17: Waste	0	0	16	All alternative sites have resulted in uncertain effects upon waste. The demolition, excavation, and construction of sites are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land and Resources	0	0	2	<p>No alternative sites have resulted in significant effects upon efficient use of land and resources. The majority of alternative sites have resulted in minor positive effects, with three sites resulting in mixed positive and negative effects, detailed in Appendix G.</p> <p>Uncertain effects have been identified for Watney Market and Samuda Estate as the density of housing is not currently known nor is it clear whether the sites will encourage sustainable use of materials.</p>

8 Findings from Other IIA Assessments

8.1 Introduction

- 8.1.1. This section presents the findings from the EqIA, HIA and HRA assessments. Further details on these assessments can be found in **Appendix H (EqIA)** **Appendix I (HIA)** and the HRA Screening Report, which has been published separately.

8.2 EqIA Findings

- 8.2.1. Overall, the policies will likely result in positive impacts on protected characteristic group members in the borough. The policies aim to address a wide range of issues, identified by the key themes within the EqIA baseline.
- 8.2.2. The main protected characteristic groups that will particularly benefit include:
- Age – older people who have reduced mobility and require access to health and other services. Also, children who are likely to benefit from air quality improvements that numerous policies look to achieve;
 - Disability – people with a variety of disabilities will benefit from a more accessible environment; and
 - Deprivation – people from low-incomes who require access to employment, education and housing and people with underlying health issues.
 - Sex, Gender reassignment and Race – women and girls, gender diverse people, and people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.
- 8.2.3. Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:
- Age, Disability and Pregnancy and maternity – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups.
 - Deprivation – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.
- 8.2.4. The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:
- Religion or belief;
 - Sexual orientation; and
 - Marriage and civil partnerships.

8.3 HIA Findings

8.3.1. The HIA assessed the NLP policies and considered their impact on the key determinants of health. These have been detailed below:

- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Community policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads, which could contribute to a worsening of air quality.
- **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, contributing to increased road traffic noise in the area. Improvements to entertainment venues and the night-time economy will also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction and developments throughout the borough, reducing the levels of nuisance felt to those living in close proximity to developments.
- **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for our Community theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation. This could have positive effects for many vulnerable groups, predominantly working aged adults (18-64) and those who are homeless.
- **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the borough. In particular, the provision and protection of affordable workspaces will aid in supporting new and emerging economic sectors in the borough. Additional town centre developments and an increase in shops, entertainment venues and food and drink facilities under the NLP is also likely to reduce unemployment in the borough, having positive effects for the unemployed and low-income residents in the borough.
- **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access to education and training. Upskilling opportunities will be particularly beneficial to the health of young people throughout the borough.
- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated

to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces policy theme include safety measurements such as appropriate signage of public areas, good lighting and surveillance. The promotion of a safe living environment will contribute positively to the physical and mental wellbeing of all residents.

- **Access to services:** Positive health effects have been identified. It is assumed that new community housing developments within the borough will have suitable access to community facilities and shops. Additionally, policies under the Community Infrastructure policy theme support development proposals to maximise opportunities for the provision of high-quality community facilities. Access to services will improve the health of elderly residents, improving health and reducing loneliness.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel, from commuting to work to walking for pleasure. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population. Further, the inclusion of town centres within the 15-minute neighbourhood principle may improve physical activity rates.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policy theme. This includes the protection and enhancement of existing biodiversity throughout the borough as well as new provisions to contribute a 30% BNG. The maintenance of green infrastructure and accessible open spaces contributes to improving mental wellbeing by providing spaces for physical activity and social interaction. Green infrastructure could be further promoted through additional requirements under the Homes for the Community policy theme.
- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

8.4 HRA Findings

Stage 1 - HRA Screening (Regulation 18)

- 8.4.1. There are no Habitats sites within LBTH's administrative area, however there are two Habitats that fall within the identified 7.2km Zone of Influence of the borough boundary and as such there will be implications for some of these Habitats sites from the policies of the Local Plan.
- 8.4.2. A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HF1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 AA. These policies have potential for LSE on nearby Habitats sites relating to increased traffic (and therefore impacts on air quality) and increased public access, recreational and development pressures.
- 8.4.3. Given the possibility of LSE associated with the screened-in interventions, further, detailed assessment was considered necessary to satisfy the requirements of the Habitats Regulations as the Local Plan emerges.
- 8.4.4. It is also not possible to rule out in-combination LSE on Habitats sites as a result of policies in the emerging LBTH Local Plan when considered with other strategic plans based on the findings of the screening assessment and a review of the HRAs supporting Local Plans for adjacent authorities.

Stage 2 - Appropriate Assessment (Regulation 19)

- 8.4.5. At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 8.4.6. Policy BO2 was subject to further consultation with the LBTH and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 8.4.7. Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1 resulted in a conclusion when taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold.
- 8.4.8. Air quality considerations for Lee Valley SPA and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway, but also that the qualifying feature (Bittern) for which air quality is indicated as a possible pressure or threat is not anticipated to be present within the components of the SPA/Ramsar within the Zone of Influence of LBTH.

- 8.4.9. Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plan¹⁸¹⁹.
- 8.4.10. Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways between LBTH (as opposed to 'as the crow flies' distances), the reasons for visits to Epping Forest as derived from published visitor surveys, and the presence of more extensive and equally attractive green spaces closer to LBTH for those activities.
- 8.4.11. Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements within the Zone of Influence of LBTH (a component of the overall SPA and Ramsar in the Lee Valley) being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access.
- 8.4.12. The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 8.4.13. For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified. In two instances this has included consideration of mitigation, but these measures are already in place and functioning, or proposed to address in-combination effects as part of strategic infrastructure delivery, not reliant on specific actions undertaken by LBTH.

¹⁸ Thames Water, Water Resource Management Plan, 2019 [online] available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-report/executive-summary.pdf>

¹⁹ Thames Water, Revised Draft Water Resources Management Plan, 2024 [online] available at: <https://www.thameswater.co.uk/about-us/regulation/water-resources>

9 Cumulative Effects

9.1 Introduction

- 9.1.1. The SEA Regulations require that cumulative effects are considered when identifying likely significant effects. Cumulative effects arise, for instance:
- Where several individual policies and sites have a combined effect on an objective; or
 - Where several policies and sites each have insignificant effects but together have a significant effect.
- 9.1.2. The significance of cumulative effects resulting from a range of activities, or multiple incidences of one activity, may vary based on factors such as the nature of the proposed sites and policies and the sensitivity of the receiving communities and environment.
- 9.1.3. This section therefore presents the findings of the following:
- Consideration of how different proposed policies and sites within the LBTH may interact and cause cumulative effects on a receptor (Intra-project effects); and
 - How the proposed policies and sites within LBTH could cause cumulative effects in association with other plans, policies and projects in the surrounding area (Inter-project effects).

9.2 Intra-Project Effects

- 9.2.1. The IIA assessment of both policies and strategic sites drew out potential intra-project cumulative effects. These have been identified in **Table 9-2** below.
- 9.2.2. **Table 9-1** below outlines the key to effects for intra-project cumulative effects.

Table 9-1 – Key to Cumulative Effects

Effect	Key
Positive cumulative effect	+
Negative cumulative effects	-
Mixed cumulative effects	+/-
No overall cumulative effects	0

Table 9-2 - Intra-Project Effects Summary

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
IIA1: Population and Equalities	+	+	+	+	+	+	+	+	+	+	0	<p>There is potential for positive cumulative effects if multiple developments were to arise from the Local Plan. These developments are likely to provide improved infrastructure for current and future populations within Tower Hamlets.</p> <p>However, pressure could be placed on existing services due to increased population demands arising from multiple developments, leading to cumulative negative effects. There is also potential for a cumulative increase in disturbance to existing local residents.</p> <p>Additionally, the Local Plan promotes inclusive design, particularly through the people places and spaces, town centres, and community infrastructure policies, improving access to all social groups inclusively.</p>
IIA2: Human Health	+/-	+	+	+	+	+	+	+	+	+	+	<p>There is a potential for negative cumulative effects to result if multiple housing developments were to come forward due to the increased strain on existing community health facilities and the potential increased demand from new populations.</p> <p>However, community infrastructure policies and some of the proposed developments include the provision of new community facilities and services, such as health provisions and public leisure facilities. Therefore, this could result in positive cumulative effects on health and wellbeing.</p> <p>The provision and improvements to the public realm and open spaces, as part of some of developments and policies, would result in positive effects on the health and wellbeing of the population in Tower Hamlets.</p>
IIA3: Economy	+	+	+	0	+	+	+	+	0	+	0	<p>There is the potential for positive effects on the economy if multiple large-scale developments were to come forward. These developments will provide a substantial amount of office space and jobs, as well as housing provisions, which will help to improve connectivity between employment centres and the housing markets. Multiple site allocations well located to retail centres will likely improve footfall in these areas, improving their vitality.</p> <p>Developments are further supported by the Local Plan's economy and town centre policies which aim to support existing office, industrial and warehouse spaces. This coupled with potential new developments could help to attract further inward investment and provide employment opportunities.</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
IIA4: Employment	+	+	+	+	0	+	+	+	0	0	+	There is potential for positive cumulative effects on employment if multiple employment and economic developments were to come forward. These developments also have the potential to increase access to public transport which will help communities within Tower Hamlets to be better connected to jobs, services and facilities.
IIA5: Housing	+	+	+	+	+	0	0	0	0	0	+	There is potential for positive effects if multiple housing developments within Tower Hamlets were to come forward. These developments will help to meet Tower Hamlets housing target of 52,125 new homes across the borough between 2023-2038 and increase the provision of affordable homes, reducing the significant barriers to housing prevalent in many areas of the borough. There is also potential for cumulative improvements to housing quality and standards across the borough, by taking into account the needs of different groups in the community Adequate provision of wheelchair adaptable homes have the potential to raise accessibility standards and promote inclusion and community cohesion.
IIA6: Crime and Safety	+	+	+	0	+	0	+	+	+	+	+	<p>It is assumed that all new developments will be built to a high standard of safety. There may be potential for positive cumulative effects positive from developing the land to provide housing and public realm improvements, particularly if designing out crime principles are applied.</p> <p>There is potential for negative cumulative effects where the provision of student rooms is brought forward simultaneously, especially in areas with existing student accommodation. Adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour, is of particular concern.</p> <p>Policies support high quality design and landscaping which can also help to generate a sense of pride and ownership within the community, resulting in the potential to reduce crime rates further.</p>
IIA7: Transport	+/-	+	+	+	+	+	+	+	+	+/-	+	<p>There is the potential for positive cumulative effects on sustainable transport if multiple large scale housing developments were to come forward within Tower Hamlets.</p> <p>Most new developments will help to improve access to sustainable transport through improvements to pedestrian and cycle connections, making active travel more appealing to the population within Tower Hamlets. Access to public transport (tube, bus, and rail) will also be improved as part of the developments.</p>

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												<p>This is further supported by the Local Plan policies which will ensure that new development is located in suitable areas where the transport requirements can be met in a sustainable manner, and which actively encourages travel by sustainable modes.</p> <p>The maximisation of parking in some locations with poor PTAL scores (as per Policy MC4) could see a cumulative increase in private vehicle use particularly at those sites which are located in areas with low PTAL scores such as Ailsa Road, Leven Road and Aberfeldy Estate.</p>
IIA8: Accessibility	+	+	+	0	+	+	+	+	+	+	0	<p>There is the potential for positive cumulative effects on accessibility if multiple developments were to come forward. The Local Plan supports enhancements to connectivity and accessibility of public transport, as well as walking and cycling. People, places and spaces and town centres in particular includes measures for accessible public spaces, improving access to all groups inclusively</p>
IIA9: Biodiversity and Natural Capital	-	+	+/-	+	+	-	0	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on biodiversity if multiple large scale housing developments and employment developments were to come forward. Given that a large number of housing allocations are located within Sites of Importance for Nature Conservation, there's potential for a cumulative loss of these sites.</p> <p>Depending upon the number and type of options selected and their proposed location, there is potential for a cumulative loss of land, which could lead to damaged and fragmented habitat connectivity.</p> <p>However, there is the potential for positive cumulative effects. There is potential for the development of additional green spaces, and the inclusion of green infrastructure within developments, that may provide biodiversity enhancements and comply with upcoming Biodiversity Net Gain requirements. Natural capital enhancements are possible through the connection of green spaces and protection of habitats linking population centres which may otherwise be lost or severed through a lack of maintenance or through other development.</p>
IIA10: Landscape and Townscape	+/-	+	+/-	+	+	+/-	+	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on landscapes and townscapes if multiple housing developments were to come forward in close proximity to parks and open spaces and areas with high townscape values. Neighbouring sites within areas designated for the management of views could result in adverse effects on the skyline. During construction of these new developments there is the potential for disturbance to the setting and tranquillity of these areas, temporarily harming the visual amenity.</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												<p>However, positive cumulative effects may arise due to good design of the proposed housing developments, other developments such as employment, and improvements to the public realm, parks and open spaces and the natural environment. In combination, such improvements could enhance the landscape and townscape character over the long term.</p>
IIA11: Historic Environment	-	+	+/-	+	+	+/-	+/-	+/-	+	+/-	+/-	<p>There is the potential for negative cumulative effects on the historic environment if multiple developments were to come forward in close proximity to heritage assets. During construction of these new developments there is the potential for disturbance to the historic environment due to noise, vibration and temporary reductions in air pollution (dust soiling). During operation, these developments have the potential to negatively impact the setting of heritage assets if not sensitively designed.</p> <p>There is also potential for the loss of heritage assets (designated, non-designated and buried archaeology) through land take for housing developments.</p> <p>However, positive cumulative effects may arise due to the historically sensitive design of developments to fit in with the setting of any surrounding designated heritage assets. This will be further supported by People, Places and Spaces policies, which preserves and enhances the historic environment. Additionally, cumulative improvements to the public realm improve the setting of heritage assets. Proposals that prioritise the restoration of existing listed buildings will cumulatively maintain the built heritage for future generations, preserving Tower Hamlets' cultural and aesthetic history.</p> <p>Policies may also result in a cumulative improvement in air quality, and reduction in the degradation of heritage assets.</p>
IIA12: Flooding	+/-	+	+/-	+	+	-	0	0	+	0	0	<p>There is potential for cumulative increases in flood risk arising from housing developments, urban intensification and additional employment developments, due to increases in hard standing and sealed surfaces. Therefore, a large number of new developments could result in potential negative cumulative effects on flooding, particularly for those sites located within flood zone 3..</p> <p>Drainage measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide, particularly through the implementation of sustainable development, climate change and environmental sustainability and natural environment policies. The application of sustainable drainage</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												systems (SuDS) across multiple schemes, especially in combination with green infrastructure (GI), can mitigate the impacts of flooding as a nature-based solution (NbS), contributing to urban resilience and climate change adaptation.
IIA13: Water Quality	-	+	0	+	+	0	0	0	+	-	-	<p>There is potential for cumulative increases in water transportation as a result of movement and connectivity and reuse, recycling and waste policies, increasing water pollution and decreasing water quality. There is also potential for decreases in water quality from housing developments as a result of increases in surface water runoff and impacts on surface water and groundwater, particularly from physical alteration as a result of development from housing allocations.</p> <p>Water quality measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide, particularly through the implementation of sustainable development, climate change and environmental sustainability and natural environment policies.</p> <p>There are potential cumulative benefits arising from delivering the local plan, clean and green future, people places and spaces, and biodiversity and open space policies through promoting water efficiency and improving water quality.</p>
IIA14: Air Quality	+/-	+	+/-	+	+	+/-	+	+	+	+/-	+/-	<p>Temporary negative cumulative effects have the potential to result during the construction phase, if multiple housing or employment developments, with overlapping construction periods, were to come forward. Construction of these developments may temporarily reduce the air quality and worsen air pollution from construction plant emissions, dust and construction traffic.</p> <p>However, if these developments are located with good connectivity to public transport facilities it will enable more people to use public transport modes instead of the use of a private car, helping to improve air quality. Improvements to pedestrian and cycle connections may further reduce reliance on private cars and encourage low-emission sustainable and active travel, in turn providing health benefits. Therefore, there is also the potential for positive cumulative effects to result if multiple housing developments were to come forward.</p> <p>The maximisation of parking in some locations with poor PTAL scores (as per Policy MC4) could see a cumulative increase in private vehicle use particularly at those sites which are located in areas with low PTAL scores such as Ailsa Road, Leven Road and Aberfeldy Estate. This may lead to</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
												Policies set out within Delivering the Local Plan, Clean and Green Future, People, Places and Spaces, Town Centres, Community Infrastructure, Biodiversity and Open Space, and Movement and Connectivity themes all help to improve air quality, through measures including low or zero emission transport, increasing accessibility to public transport, increase green infrastructure which will help to reduce air pollution.
IIA15: Climate Change	+/-	+	+	+	+	0	0	0	+	0	0	<p>The addition of increased use of hard standing surfaces as part of the proposed housing developments will increase surface water runoff. Therefore, a large number of new developments could result in potential negative cumulative effects on flooding, particularly for those developments located within flood zone 3.</p> <p>However, a number of policies within delivering the local plan, homes for the community, clean and green future, people places and spaces, and biodiversity and open space help to improve climate resilience through encourage the incorporation of SUDs which will help to reduce overall flood risk within the Borough. These policies also aim to manage heat risk, both internally and externally. These policies will help to provide a cumulative increase in resilience to climate change and the urban heat island (UHI) effect within the borough.</p>
IIA16: Greenhouse Gases	+/-	+	+/-	+	+	-	0	-	+	+/-	+/-	<p>If multiple developments were to come forward there is the potential for these developments to be resource intensive and have high levels of embodied carbon.</p> <p>However, policies set out in clean and green future, people places and spaces, delivering the local plan, and biodiversity and open space all support a transition towards reducing GHG emissions through reductions in energy use, vehicle reliance, or low levels of embodied carbon. These alongside the support for sustainable transport modes, could cumulatively reduce GHGs within the borough.</p>
IIA17: Waste	+/-	+	-	+	+	-	0	-	0	-	+	<p>The Local Plan supports the re-use of materials and the minimisation of waste within developments, predominantly through the Reuse, Recycling and Waste policies. The implementation of circular economy principles and the re-use of materials within developments also contributes to positive cumulative effects.</p> <p>There is potential for cumulative increases in waste produced by demolition, excavation, and construction resulting from developments arising from the Local Plan, including housing and employment developments</p>

IIA Objective	Site Allocations	Delivering the Local Plan	Homes for the Community	Clean and Green Future	People Places and Spaces	Inclusive Economy and Good Growth	Town Centres	Community Infrastructure	Biodiversity and Open Space	Movement and Connectivity	Reuse, Recycling and Waste	Summary of Effects
IIA18: Efficient use of Resources	+/-	0	+/-	+	+	+	+	+	+/-	-	0	<p>The Local Plan promotes the efficient use of land and resources where possible, in a way that makes as much use of previously developed land and brownfield sites as possible. The majority of site allocations are located on either previously developed land or brownfield sites, resulting in positive cumulative effects. However, there are a number of new allocations where there is potential for land take to occur.</p> <p>Some other developments which may arise out of the Movement and Connectivity and Homes for the Community, could result in developments which may not occur on previously developed land or brownfield sites and could result in a cumulative loss of more valuable land, including MOL.</p>

9.3 Inter-Project Effects

9.3.1. **Table 9-3** below outlines the sources of potential inter-cumulative effects, whilst **Table 9-4** details the cumulative effects identified for each of the IIA Topics in relation to these policies and plans. This uses the same key to effects as set out in **Table 9-1** above.

Table 9-3 – Sources of Inter-Cumulative Effects

Policy or Plan	Plan Details
The London Plan, 2021	<p>The London Plan is the Spatial Development Strategy for Greater London and acts as a framework and a vision for the development of London over the next 20-25 years.</p> <p>The London Plan supports major development of London’s growth corridors and Opportunity Areas (areas that will see the most significant change), which have the potential to deliver a substantial number of new homes and jobs in London. The Plan sets out three Opportunity Areas (associated with Crossrail 2) which have the potential to cause cumulative effects in the borough. The boundaries of these Opportunity Areas are yet to be defined. The borough also sits within the Crossrail 2 South Growth Corridor.</p>
Crossrail 2	<p>Crossrail 2 is a proposed rail route in the South East, running from nine stations in Surrey to three in Hertfordshire, providing a new North–South rail link across Greater London, and helping to reduce congestion.</p> <p>The route would free up space on the existing congested SW mainline and would enable more local services to central London that bypass the most congested stations. Trains would likely run south west of Wimbledon serving lines to Epsom, Chessington South, Hampton Court and Shepperton.</p>
Liverpool Street Station	<p>Liverpool Street Station is located in the neighbouring City of London. The station is the busiest nationally, with up to 135 million people using the station annually. Passengers already experience overcrowding, poor accessibility, and limited connectivity. The proposed transformation of the station will deliver greater accessibility and a world-class passenger experience.</p>
55 Bishopsgate	<p>The scheme comprises a 63 storey and 22 storey mixed-use buildings, that will feature a free to visit public roof top, 103,000 sq metres of workspace, auditorium, meeting spaces and spaces to support events and pop-ups. At 284 meters tall, 55 Bishopsgate will become the third tallest tower in the Square Mile.</p>

Policy or Plan	Plan Details
One Exchange Square	<p>Located in the City of London, the 13-storey building will deliver 428,000 sq ft of high-quality workspace and 15,000 sq ft of retail, fronting both Bishopsgate and the newly redesigned Exchange Square.</p>
Mayor of London, Mayor’s Transport Strategy, 2021/22	<p>The Mayor's Transport Strategy sets out policies and proposals to reshape transport in London over the next two decades (up to 2038).</p> <p>This sets out plans to transform London's streets, improve public transport and create opportunities for new homes and jobs. Its aim is for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041.</p> <p>The Strategy introduces a Healthy Streets approach. This aims to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business.</p>
Neighbouring Local Plans	<p>Local plans in neighbouring boroughs (City of London, Hackney and Newham) influence cross-boundary development improvements.</p> <p>The plans include:</p> <ul style="list-style-type: none"> ■ City of London draft Local Plan (adoption June/July 2025) ■ Hackney Local Plan 2033 (adopted July 2020) ■ Newham Local Plan Review (Regulation 19) ■ London Legacy Development Corporation Local Plan 2020-2036 (adopted July 2020)
Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	<p>Local Transport Plans and Implementation Plans enable Local Authorities to plan for transport in their areas. They can identify both strategic policy and implementation plans for delivering this policy. Therefore, they identify policy options for implementing transport improvements, including different modes of transport. They also prioritise a number of areas and schemes for development over the plan period.</p> <p>Local Implementation Plans in neighbouring boroughs (City of London, Hackney and Newham) influence cross-boundary transport improvements and major road networks.</p> <p>The plans include:</p> <ul style="list-style-type: none"> ■ Tower Hamlets Transport Strategy 2019-41 ■ City of London Transport Strategy, 2019 ■ Hackney Transport Strategy 2015-2025 ■ Newham Local Implementation Plan

Table 9-4 - Inter-Project Effects Summary

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
IIA1: Population and Equalities	+/-	+	+	+	+	+	+/-	+	<p>There is a potential for negative cumulative effects to result if multiple developments were to come forward across the borough and within neighbouring local authorities due to the increased strain on existing community facilities due to the increased demand from new populations.</p> <p>Positive effects would result from the provision of new community facilities, employment opportunities and services as part of these major developments. New transport schemes (Crossrail 2) will improve access and connectivity to community facilities and services, especially for the people who cannot drive or do not have access to a private car.</p> <p>If multiple housing developments within the borough were to come forward, more people will be placed closer to community facilities and employment opportunities. This will result in positive cumulative effects.</p>
IIA2: Human Health	+/-	+	+	+	+	+	+/-	0	<p>There is a potential for negative cumulative effects to result if multiple housing developments were to come forward, due to the increased strain on existing community health facilities resulting from the increased demand from new populations.</p> <p>The provision and improvements to the public realm and open spaces, as part of some of these housing developments, will result in positive effects on the health and wellbeing of the population in the region. This is because access to greenspace can provide better mental health and wellbeing outcomes including reduced levels of depression, anxiety and enhanced quality of life, as well as helping to bind communities together, reduce loneliness, and mitigate the negative effects of air pollution and excessive noise.</p>
IIA3: Economy	+	+	+	+	+	+	+	+	<p>There is the potential for positive effects on the economy if multiple large-scale developments were to come forward, such as those in opportunity areas. These developments will provide a substantial amount of office space and jobs, as well as housing provisions, which will help to improve connectivity between employment centres and the housing markets.</p> <p>Greater cumulative connectivity will result through investments in sustainable transport developments such as Liverpool Street Station redevelopment and Crossrail. This will help communities to gain greater access to jobs, services and facilities. Access to</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									activities provides the potentiality for people to participate in education, work, social, leisure, cultural, etc. Greater connectivity to Tower Hamlets may also bring about greater tourism opportunities.
IIA4: Employment	+	+	+	+	+	+	+	+	<p>There is the potential for positive effects on employment if multiple large-scale developments were to come forward, such as those in opportunity areas. These developments will provide a substantial amount of office space (particularly 55 Bishopsgate and One Exchange Square) and jobs, which will help to improve connectivity between employment centres.</p> <p>Greater cumulative connectivity will result through investments in sustainable transport developments such as Liverpool Street Station redevelopment and Crossrail. This will help communities to gain greater access to jobs, services and facilities.</p>
IIA5: Housing	+	+	0	0	0	0	+	0	Significant positive effects will result if multiple housing developments, such as those in opportunity areas, were to come forward in combination with Tower Hamlets' proposed development sites. These developments will help to meet Borough specific housing targets set out in their local plans and increase the provision of affordable housing.
IIA6: Crime and Safety	+	0	+	+	+	+	+	0	<p>It is assumed that all schemes and projects will be built to a high standard of safety. There may be potential for positive cumulative effects from developing the land to provide housing and public realm improvements, particularly if designing out crime principles are applied.</p> <p>Using high quality design and landscaping can also help to generate a sense of pride and ownership within the community, resulting in the potential to reduce crime rates further.</p>
IIA7: Transport	+	+	+	+	+	+	+	+	There is the potential for positive cumulative effects on sustainable transport if multiple transport schemes were to come forward, such as Crossrail 2 and neighbouring local transport/implementation plan. These developments will help to increase and improve the offering and connectivity of sustainable transport modes in the region.
IIA8: Accessibility	+	+	+	+	+	+	+	+	There is the potential for positive cumulative effects on accessibility if multiple transport schemes were to come forward, including Crossrail 2 and neighbouring local transport/implementation plan. These developments will help to increase and improve

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									the accessibility within Tower Hamlets and the wider London area, offering increased connectivity. Additionally, there is potential for positive cumulative effects as a result of accessibility to all users, including disabled and low-income users who may rely on public transportation through improved transportation.
IIA9: Biodiversity and Natural Capital	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>Potential for cumulative loss, damage or fragmentation of statutory and non-statutory sites and habitats if multiple developments, across similar timeframes were to come forward. Although it is assumed that protected species would be mitigated at a project level, there are wider impacts on biodiversity.</p> <p>Positive cumulative effects may result through BNG over multiple development plans. These are likely to be driven by the London Plan 2021 policies where green infrastructure should be incorporated in design to increase biodiversity and if biodiversity is lost on site this should be mitigated by improving the quality or management of the rest of the site or deliver off-site compensation of better biodiversity value.</p> <p>Further positive cumulative effects will result from the development of sustainable transport schemes (Crossrail 2). This will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions, journey times and congestion, resulting in increased tranquillity and air quality.</p>
IIA10: Landscape and Townscape	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	The provision of public realm improvements through the London Plan, Local Plans and transport/implementation plans could help to increase and improve the open space offering as well as the setting of the borough's townscape and landscape. This will result in positive cumulative effects; however, multiple developments (in particular tall buildings in neighbouring boroughs) could result in a cumulative loss of open spaces, and obstructions to key views.
IIA11: Historic Environment	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There is the potential for temporary negative cumulative effects on the historic environment if multiple housing developments and transport schemes were to come forward. During construction of these developments there is the potential for disturbance to the historic environment due to noise and air pollution.</p> <p>Positive cumulative effects will arise due to the historically sensitive design of the proposed housing developments to fit in with the setting of any surrounding designated heritage assets and Conservation Areas, including World Heritage Sites.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
									<p>Positive cumulative effects will also result from the development of sustainable transport schemes (Crossrail 2). This will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions, journey times and congestion, resulting in increased tranquillity and setting of the historic environment.</p> <p>Further potential positive effects could result due to the improved access to the historic environment by the new transport schemes which could present opportunities to generate activity and vitality.</p>
IIA12: Flooding	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>The addition of increased use of hard standing surfaces as part of the proposed opportunity areas and transport developments will increase surface water runoff, therefore, resulting in potential negative effects on flooding.</p> <p>However, the proposed developments are likely to incorporate permeable surfaces and SUDs which will help to reduce flood risk if implemented county-wide. These are likely to be driven by the London Plan 2021 policies regarding flood risk management.</p>
IIA13: Water Quality	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There is potential for cumulative increase in surface water runoff and flood risk, and impacts on surface water and groundwater, particularly from physical alteration as a result of development. Drainage and water quality measures are likely to be specific to each development, but there may be cumulative benefits if implemented borough-wide.</p>
IIA14: Air Quality	+	+/-	+/-	+/-	+/-	+	-	+/-	<p>Temporary negative cumulative effects have the potential to result during the construction phase, if multiple developments were to come forward. Construction of these developments may reduce the air quality through an increase in particulate matter and dust.</p> <p>Positive cumulative effects will result through the development of sustainable transport schemes (Crossrail 2). In combination with new Local Plan sites and policies, this will increase access to public transport modes, reducing the use of a private car, and therefore reducing greenhouse gas emissions and improving air quality. Further positive cumulative effects will result from the reduction in journey times and congestion on the highway network.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
IIA15: Climate Change	+	+	+	+/-	+/-	+	+/-	+/-	<p>Climate change adaptation measures are likely to be specific to each development, but there may be cumulative benefits if implemented across multiple plans (as set out in the London Plan, Mayor's Transport Strategy and neighbouring Local Plans).</p> <p>Temporary negative cumulative effects have the potential to result during the construction phase if multiple housing and commercial developments were to come forward. Construction of these developments may increase levels of greenhouse gas emissions through the embodied carbon associated with the construction and maintenance of the development. Investment in sustainable transport schemes, such as Crossrail 2, will have positive cumulative effects on climate change due to the reduction of private car use and therefore, greenhouse gas emissions.</p> <p>Positive cumulative effects have the potential to result if multiple housing and commercial developments were to come forward, due to the provision of public realm improvements and enhancements to biodiversity as part of the design. Further positive effects may result from low carbon and energy efficient design, which is resilient to the effects of climate change. Climate change adaptation measures are likely to be specific to each development,</p>
IIA16: Greenhouse Gases	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	<p>There may be cumulative benefits from transport initiatives (including Crossrail 2 and proposals set out in Mayor's Transport Strategy, and neighbouring transport/implementation plans) and low carbon developments (as set out in the London Plan and neighbouring local plans) in reducing greenhouse gases, however, increased development is also likely to increase transport related greenhouse gas emissions, particularly where this leads to increases in vehicular traffic as well as embodied carbon due to development.</p>
IIA17: Waste	+/-	-	-	-	-	-	+/-	+/-	<p>There is potential for negative cumulative effects on waste as a number of large-scale projects, such as HS2 and Crossrail 2 coupled with development in the borough, could lead to a large cumulative use of resources and production and disposal of waste during construction. There is potential for developments to encourage the sustainable use of resources and encourage re-use and recycling initiatives to minimise waste going to landfill.</p>

IIA Objective	The London Plan, 2021	Crossrail 2	Liverpool Street Station Redevelopment	55 Bishopsgate	One Exchange Square	Mayor of London, Mayor's Transport Strategy, 2021/22	Neighbouring Local Plans	Tower Hamlets Transport Strategy and Neighbouring Local Transport Plans, Strategies and Implementation Plans	Summary of Effects
IIA18: Efficient use of Resources	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	There is potential for negative cumulative effects on the efficient use of land as a number of large-scale projects, such as Crossrail 2, Liverpool Station, 55 Bishopsgate, One Exchange Square and Tower Hamlets Opportunity Area coupled with other development in the borough, could lead to a large cumulative loss of land, some of which may not be brownfield land. However, positive cumulative effects could arise if the majority of the of proposed developments are situated on brownfield sites.

10 Mitigation, Enhancements and Monitoring

10.1 Mitigation and Enhancement Measures

- 10.1.1. Mitigation of significant negative effects of the plan and enhancement of positive effects are a key purpose of IIA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan. The measures are known as ‘mitigation’ measures. Mitigation measures include both proactive avoidance of adverse effects and actions taken after potential effects are identified.
- 10.1.2. The mitigation measures proposed in **Table 10-1** are designed to avoid or reduce the effects identified as potentially negative through the policy assessments on the IIA Objectives. The table also includes enhancement measures, that aim to optimise positive impacts and enhance sustainability. Both enhancement and mitigation measures do not always sit within the control of the Local Plan and can be achieved through other plans and strategies.
- 10.1.3. Policy and site-specific mitigation measures have been included within **Appendix F and G**.

Table 10-1 – Proposed Mitigation and Enhancement Measures

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA1 - Population and Equalities	Inclusive mobility guidance should be adhered to ensure designs are accessible for everyone.	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA2 - Human Health	The loss of community facilities to make way for site allocations should be avoided. Where a loss can't be mitigated, these should be reprovioned elsewhere.	Inclusion within preferred Local Plan policies Project level design and assessment Community engagement
IIA1 - Population and Equalities IIA2 - Human Health	Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities.	Project level design and assessment as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA4 – Employment and skills	Employment should be focused on local residents in the first instance. Policies should aim to increase employment for all protected groups where barriers to employment and education exist (low-incomes, younger people, disabled).	Inclusion within preferred Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA1 - Population and Equalities IIA2 - Human Health IIA6 – Crime and Safety	Community safety, health and equalities should be considered in design, for example, pedestrian networks, including linking new developments into existing infrastructure, lighting and other safety design considerations, materials used (contrasting colours, non-slip surfaces), accessibility for all including those with reduced mobility or disability, well-being, affordability of schemes, active travel.	Inclusion within Local Plan policies Project level Community Safety Assessment, EqIA and HIA as part of subsequent EIA/ planning application
IIA1 - Population and Equalities IIA7 – Sustainable Transport IIA8 - Accessibility	Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles. Consideration should be made for removing other barriers towards active travel for disabled people and low income groups, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles. It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users. The Local Plan should also support community engagement with various groups prior the development of transport infrastructure.	Inclusion within preferred Local Plan policies Project level design and assessment and EqIA as part of subsequent EIA/ planning application Tower Hamlets Transport Strategy 2019-2041 The Mayor’s Transport Strategy
IIA1 - Population and Equalities	Where policies and site allocations make provision for open spaces and public realm improvements, there is a need for these spaces to	Inclusion within preferred Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
<p>IIA2 – Health and Wellbeing</p> <p>IIA6 – Crime and Safety</p>	<p>be well designed and well lit, to ensure that they are safe and feel safe for all users, particularly after dark.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p> <p>Accessible surfacing should be considered for wheelchair users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p>	<p>Project level design and assessment as part of subsequent EIA/ planning application</p> <p>Community engagement</p>
<p>IIA1 - Population and Equalities</p> <p>IIA10 - Landscape and Townscape</p>	<p>Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs.</p>	<p>Project level design and assessment as part of subsequent EIA/ planning application</p>
<p>IIA3 – Economy and Town Centres</p>	<p>Where sites are located within or in close proximity to local and neighbourhood shopping centres/ parades it is imperative that development does not detrimentally impact on the vitality of the designated centre.</p>	<p>Project level design and assessment</p> <p>Community engagement</p>
<p>IIA3 – Economy and Town Centres</p>	<p>The loss of businesses should be avoided. Where it cannot be avoided, discussions with owners should be undertaken to ensure suitable alternative locations are identified and/or adequate</p>	<p>Inclusion within preferred Local Plan policies</p> <p>Community engagement</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA4 – Employment and Skills	<p>compensation is provided particularly where businesses may need to be temporarily closed or relocated during construction.</p> <p>Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p>	Project level design and assessment
IIA4 – Employment and skills	Where new development comes forward in close proximity to existing shop frontages and businesses, there’s a need to ensure that they can remain open and maintain their existing business hours.	<p>Inclusion within Local Plan policies</p> <p>Project level design and assessment as part of subsequent EIA/ planning application</p>
IIA6 – Crime and Safety	<p>Development should incorporate designing out crime principles, particularly for those potential development sites located in areas with high levels of crime deprivation.</p> <p>Although crime is incorporated within the Local Plan, it currently doesn’t currently have its own standalone policy. Given the high levels of crime in some areas of the borough, reductions in crime could be better supported by planning policies.</p>	<p>Incorporation within the Local Plan policies</p> <p>Project level design and assessment as part of subsequent EIA/ planning application</p>
IIA9 – Biodiversity and Natural Capital	<p>Consideration needs to be given to the potential effects of construction of developments (noise, vibration and air pollution) on biodiversity.</p> <p>A Lighting Strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p>	<p>Inclusion within Local Plan policies</p> <p>Project level design and assessment (including noise assessments/ surveys)</p> <p>Lighting Strategy</p>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA9 – Biodiversity and Natural Capital	For those sites that incorporate existing green space, Phase 1 habitat surveys should be undertaken to identify any habitats and species.	Project level assessment
IIA10 - Landscape and Townscape	<p>Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views.</p> <p>As outlined in the draft Tall Buildings SPD²⁰ Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).</p>	<p>Scheme level design and planning application</p> <p>Application of the Tall Buildings SPD</p>
IIA10 - Landscape	New developments should seek to maximise sustainability benefits from existing landscape, townscape and heritage assets by valuing them inherently and for the wider services they provide.	Historic Landscape Characterisation

²⁰ London Borough of Tower Hamlets, Tall Buildings SPD, Consultation Draft [online] available at: <https://talk.towerhamlets.gov.uk/tallbuildings>

IIA Objective	Mitigation/ Enhancement	Mechanism
and Townscape IIA11 - Historic Environment	Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. Development proposals in designated views should comply with London Plan Policy HC4.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA11 - Historic Environment	Promoters and designers should liaise closely with Tower Hamlets and Historic England to avoid or minimise negative effects, such as land take and light pollution, whilst seeking to maximise benefits, such as tranquillity. Where developments are being built and/or improved within, or close proximity to designated historic assets, visual effects assessment should be undertaken to determine magnitude of impact and possible mitigation.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA11 - Historic Environment	Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments.	Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application Heritage Impact Assessments
IIA11 – Historic Environment	Characterisation work should be undertaken to understand the potential impact of site allocations on historic places and inform assessments of an area’s capacity to accommodate development. Site specific studies, such as archaeological desk-based assessment and fieldwork, may also be necessary to provide adequate information.	Historic Landscape Characterisation Archaeological desk based assessment

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA10 - Landscape and Townscape IIA11 - Historic Environment	Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes.	Historic Landscape Characterisation Project level landscape and visual impacts assessments as part of subsequent EIA/ planning application
IIA10 - Landscape and Townscape	Care must however be taken to ensure that tall buildings in clusters do not appear to coalesce in views as this can have a significant visual impact and undermine legibility. Particular attention must be given to designated views. As outlined in the draft Tall Buildings SPD ²¹ Applications for tall buildings, due to their exceptional nature, will need to provide the following supporting information to enable a thorough assessment of the proposals and design: survey plan and calculations, a 3D massing model, Tall Buildings Statement, Design and Access Statement, Townscape and visual impact assessment, Heritage impact statement, Physical impact assessment, Movement statement, Building services strategy and Sustainability Statement (such as BREEAM/ Home Quality Mark).	Scheme level design as part of subsequent EIA/ planning application

²¹ London Borough of Tower Hamlets, Tall Buildings SPD, Consultation Draft [online] available at: <https://talk.towerhamlets.gov.uk/tallbuildings>

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA14: Air Quality	A Dust Management Plan should be compiled prior to demolition and construction of new sites.	Project level Construction Environmental Management Plan (CEMP)
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions	Development should ensure design that is resilient to the current and future risks of climate change i.e. extreme heat, cold and precipitation. This could include the use of locally available, renewable, or reclaimed resources, as these are often more resilient. New developments should incorporate renewable energy generation methods, such as solar panels, to reduce the carbon emissions of the site.	Project level design and assessment as part of subsequent EIA/ planning application
IIA12 – Flood Risk	Sequential testing should be undertaken, to avoid sites with the highest flood risk. Where this isn't viable and proposed sites are located within flood zones 2 or 3 a full flood risk assessment should be undertaken. Scheme level design should also consider the incorporation features to reduce flood risks, both now and in future, in light of future precipitation changes associated with climate change. This could include features such as sustainable urban drainage solutions (SuDs), permeable paving and natural engineering such as tree planting.	Project specific transport plans/assessments as part of subsequent EIA/ planning application Incorporation within the Local Plan policies

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA12 – Flooding	Flood Risk Assessments should be undertaken for all developments located in Flood Zone 2 or 3. The inclusion of SuDS should be implemented where developments are located in flood zones.	Project level design and assessment as part of subsequent EIA/ planning application
IIA13 – Water Quality IIA18 – Waste	Vessels used to facilitate the movement of waste will need to adhere to the Maritime and Coastguard Agency Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations 2008 and other best practice to minimise pollution and effects on water quality.	Project level design and assessment as part of subsequent EIA/ planning application
IIA15 – Climate Change and Resilience IIA16 – GHG Emissions IIA17 – Waste IIA18 – Efficient use of resource	Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy and should consider BREEAM and BREEAM Infrastructure. Sustainable design and construction techniques should be promoted, such as low energy lighting and opportunities for renewable energy regeneration.	Project level design and assessment as part of subsequent EIA/ planning application CEMP/ OEMP

IIA Objective	Mitigation/ Enhancement	Mechanism
IIA17 – Waste IIA18 – Efficient use of resource	Proposed sustainable transport infrastructure such as cycle lanes, bus lanes and footpaths, should where appropriate, prioritise the reallocation of the highway network.	Project level design and assessment as part of subsequent EIA/ planning application Tower Hamlets Transport Strategy 2019-2041
IIA17 – Waste IIA18 – Efficient use of resource	A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).	Project level design and assessment – CEMP and OEMP

10.2 Monitoring Measures

- 10.2.1. The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.
- 10.2.2. The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the IIA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:
- IIA1 and IIA2: The effects of a growing population on community facilities and services;
 - IIA5: The number of affordable and adaptable housing provided;
 - IIA9: The number of new developments achieving biodiversity net gain;
 - IIA10: The potential effects on key views;
 - IIA12: Flood risk of new development;
 - IIA16: Levels of embodied carbon from new development; and
 - IIA18: Levels of waste generations on new developments.
- 10.2.3. It should be noted that these uncertain effects are generally where limited scheme information is currently available.
- 10.2.4. **Table 10-2** below sets out those monitoring measures which could be suitable in monitoring those uncertain residual effects outlined above. Targets have either been taken from the preferred Local Plan or the London Plan. These are subject to change as the plan develops.

Table 10-2 – Proposed Monitoring Measures

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
IIA1 and IIA2: The effects of a growing population on community facilities and services	The number of new healthcare and community services provided. Ratio of patient-to-staff numbers at GP practices	No targets included as part of the Local Plan or London Plan
IIA5: The number of affordable and adaptable housing provided	The number/ percentage of affordable homes being delivered within the borough. The number/ percentage of adaptable homes or specialist accommodation being delivered within the borough.	Policy HF2 of the Local Plan: <ul style="list-style-type: none"> ■ Deliver a minimum of 40% affordable housing (by habitable room) on-site when seeking to provide 10 or more new residential units; ■ Deliver a minimum of 50% affordable housing (by habitable room) on-site through the redevelopment of affordable housing, estate regeneration schemes and industrial land for residential use; and ■ Deliver the required amount of affordable homes in accordance with a 85% social homes and 15% intermediate homes tenure split. Policy D7 of the London Plan:

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
		<ul style="list-style-type: none"> Delivery of at least 10% of dwellings meet Building Regulation requirement M4(3)²² 'wheelchair user dwellings'
IIA9: The number of new developments achieving biodiversity net gain	The number of new developments achieving biodiversity net gain	<p>Policy BO4 of the draft Local Plan:</p> <p>To deliver a minimum 2.5 biodiversity unit per hectare increase or 30% gain (whichever is higher) in habitat value for wildlife compared with the pre-development baseline</p>
IIA10: The potential effects on key views	Number of tall building applications granted planning permission within key view areas	No targets included as part of the Local Plan or London Plan
IIA11: Potential negative effects from new developments on heritage assets	<p>Number of developments within a conservation area</p> <p>Number of applications granted planning permission contrary to advice from Historic England.</p>	No targets included as part of the Local Plan or London Plan

²² HM Government, The Building Regulations, Access to and Use of Buildings (M), 2011 [online] available at: https://assets.publishing.service.gov.uk/media/5a7f8a82ed915d74e622b17b/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

Potential Effects	Potential Key Performance Indicators	Targets (as set out in the draft Local Plan or London Plan)
IIA12: Flood Risk	Number of Environment Agency objections to planning applications.	No targets included as part of the Local Plan or London Plan
IIA16: Levels of embodied carbon from new development.	The number of development proposals that meet London’s Energy Transformation Initiative (LETI) 2020 best practice embodied carbon emission targets	Policy CG4 of the draft Local Plan: <ul style="list-style-type: none"> ■ Domestic buildings should achieve embodied carbon limits of 500kg CO2/m² or less; and ■ Non-domestic buildings should achieve embodied carbon limits of 600kg CO2/m² or less.
IIA18: Uncertain effects of waste generations on new developments	<p>The amount of construction and demolition waste going to landfill (through Site Waste Management Plans or BREEAM Infrastructure)</p> <p>The number of new developments which incorporate waste saving initiatives</p> <p>Household and commercial waste and recycling figures for the borough</p>	As per Policy SI 7 of the London Plan: <ul style="list-style-type: none"> ■ Zero biodegradable or recyclable waste to landfill by 2026 ■ Meet or exceed the municipal waste recycling target of 65% by 2030 ■ Meet or exceed the targets for each of the following waste and material streams: <ul style="list-style-type: none"> • a) construction and demolition – 95% reuse/ recycling/ recovery • b) excavation – 95% beneficial use

11 Recommendations

- 11.1.1. This section sets out the recommendations identified throughout the IIA assessment. These have been taken from the IIA Report, HIA, EqIA and HRA. It should be noted that these are different from the mitigation measure outline in **Section 11** above, as they focus on potential changes to the Local Plan, rather than measures identified in response significant effects.
- 11.1.2. Some of these changes have been made to the Local Plan since the Regulation 18 consultation, whilst some additional measures from the preferred plan have since been identified. Some recommendations fall out of scope of the Local Plan and may be delivered by other plans and strategies.
- 11.1.3. **Table 11-1** below outlines these recommendations.

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Table 11-1 – IIA Recommendations

Item	Recommendation	Source Document
Policy HF1	<p>If using mandatory ballots, residents need to be informed and engaged in the process of change for it to be a meaningful process. It is suggested that resources are allocated to allow assistance with the co-design of schemes with the community.</p> <p>Where engagement is low, measures should be explored to increase this and low engagement should not form a barrier to schemes being approved. It could be beneficial to use consultants for this exercise who are experienced in working with groups where engagement may be low.</p>	EqIA
Policy CG4	<p>Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers.</p> <p>Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.</p>	EqIA

Item	Recommendation	Source Document
Policy CG6	Part 8 could be reworded to ' <i>Nature based solutions such as natural drainage systems and planted landscapes...</i> '	IIA Policy Assessment Appendix F
Policy CG9	Policy CG9 could benefit from including the promotion of public or active travel modes within the policy, rather than just stating electric vehicles or sustainable movement patterns.	IIA Policy Assessment Appendix F
Policy PS5	For Part G, it may be more inclusive to include all local groups and genders rather than specifically women. Policy supporting text could also include further statistics on LGBTQIA+ communities as it is currently quite focused on male and female genders. Additional reference could be made to the Tackling Violence Against Women and Girls Strategy (2021) and Inclusive Spaces and Places for Girls and Young People, An Introduction for Local Government (2023).	IIA Policy Assessment Appendix F
Policy PS1, PS3 and PS4	These policies could incorporate elements of climate resilient design. This could include specific aspects such as rainwater and flood attenuation, SuDs, permeable paving, green roofs etc. Reference could also be made to urban creep.	IIA Policy Assessment Appendix F
Policy PS1	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.	EqIA/ HIA
Policy PS2	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.	EqIA/ HIA

Item	Recommendation	Source Document
	Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.	
Policy PS3	PS3 touches on efficiency as part of design which could be strengthened by inclusion (either within the policy or supporting text) on what type of efficiency measure these could include i.e. water efficient measures, energy efficient measures etc.	IIA Policy Assessment Appendix F
Policy PS9	Shopfronts act as key sites to reduce sensory overload for the neurodivergent population of the borough. Enhancement of appearance should not compromise the accessibility of neurodivergent people.	EqIA
Policy PS10	Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.	EqIA/ HIA
Policy EG1	This policy could benefit from including new employment space to provide a range of diverse employment opportunities, from a range of sectors.	IIA Policy Assessment Appendix F
Policy TC2	This policy could benefit from including accessibility requirements for town centres under 4 (b).	IIA Policy Assessment Appendix F
Policy TC7	More emphasis should be placed on ensuring that night time uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy	IIA Policy Assessment Appendix F EqIA

Item	Recommendation	Source Document
	TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.	
Policy CI1	The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities.	EqIA
Policy CI2	<p>the explanation of Part 2 could benefit from including further explanation as to how inclusive design can improve access to disabled users and those with mobility issues.</p> <p>Policy CI2, Part 2 could also benefit from including the promotion of schemes to provide access to low-income groups.</p>	IIA Policy Assessment Appendix F
Policy BO1	Part b could be changed to "maintain and enhance" the open character of MOL Part d (ii) could be amended to include safety measures, such as lighting and clear lines of sight.	IIA Policy Assessment Appendix F
Policy BO2	<p>Accessible surfacing should be considered as part of the policy for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.</p>	EqIA/ HIA
Policy BO4	This policy should also make reference to the requirements of BNG under the Environment Act 2021 and Defra's Biodiversity Metric. Part 2 of the policy is quite complicated and some of the text could be moved to the supporting text.	IIA Policy Assessment Appendix F

Item	Recommendation	Source Document
Policy BO6	Part 2 (b) could include mention of suggested barriers to tackle barriers to inclusion and equality. Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.	IIA Policy Assessment Appendix F EqIA/ HIA
Policy BO7	Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.	EqIA/ HIA
Policy RW2	Policy RW2 could benefit from acknowledging and implementing circular economy principles within the development of new waste sites.	IIA Policy Assessment Appendix F
Policy MC2	The policy could benefit from including mention of how sustainable transport can improve access to those on low-incomes.	IIA Policy Assessment Appendix F
Policy MC4	This policy should reconsider the maximisation of car parking, and focus on improving sustainable transport links where PTAL scores are low, rather than encourage further use of private vehicles. This will disproportionately affect those groups (such as low income groups) who may not have access to private vehicles.	IIA Policy Assessment Appendix F EqIA
Policy MC4	Policy should ensure that cycle parking should be high-quality and suitable for a range of cycles including adapted cycles and cargo bikes as per the London Cycling Design Standards ²³ .	EqIA

²³ Transport for London, London Cycling Design Standards, 2014 [online] available at: <https://content.tfl.gov.uk/lcds-chapter1-designrequirements.pdf>

Item	Recommendation	Source Document
	<p>Management should protect priority bays to maintain accessibility for protected groups.</p> <p>Policy should ensure that EV charging points should adhere to the British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022)²⁴</p>	
Homes for the Community	<p>It should be noted that the Decent Home Standard is currently applicable to the social rented sector whilst the Decent Homes Standard in the private rented sector is undergoing consultation.</p> <p>More information could be provided on what the policies mean by 'sustainable' residential development i.e., does this include renewable energy regeneration, use of sustainable materials, well located to sustainable transport etc.</p>	IIA Policy Assessment Appendix F
Policy HF1	Like Policy HF6, HF1 should also ensures that developments employ high quality design and is sympathetic to local character and heritage.	IIA Policy Assessment Appendix F
Policy DV6	The policy could incorporate community engagement within the policy. It is implied within the supporting text but the important role it plays in adding social value to new developments isn't overly clear.	IIA Policy Assessment Appendix F

²⁴ British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022) [online] available at: <https://www.bsigroup.com/en-GB/our-services/events/webinars/pas-1899-launch/#:~:text=PAS%201899%3A2022%20is%20a,and%20indicators%20to%20be%20provided.>

Item	Recommendation	Source Document
All Sites	Where possible, further details should be provided on the proposed Site Allocations to ensure a more accurate assessment. This includes quantum and types of housing, percentage of affordable housing as well as additional community facilities.	IIA Site Assessment Appendix G
Bishopsgate Goods Yard Housing Allocation	The 5-a-side football pitches should be re-provisioned elsewhere in the borough, to avoid a loss in community facilities.	IIA Site Assessment Appendix G

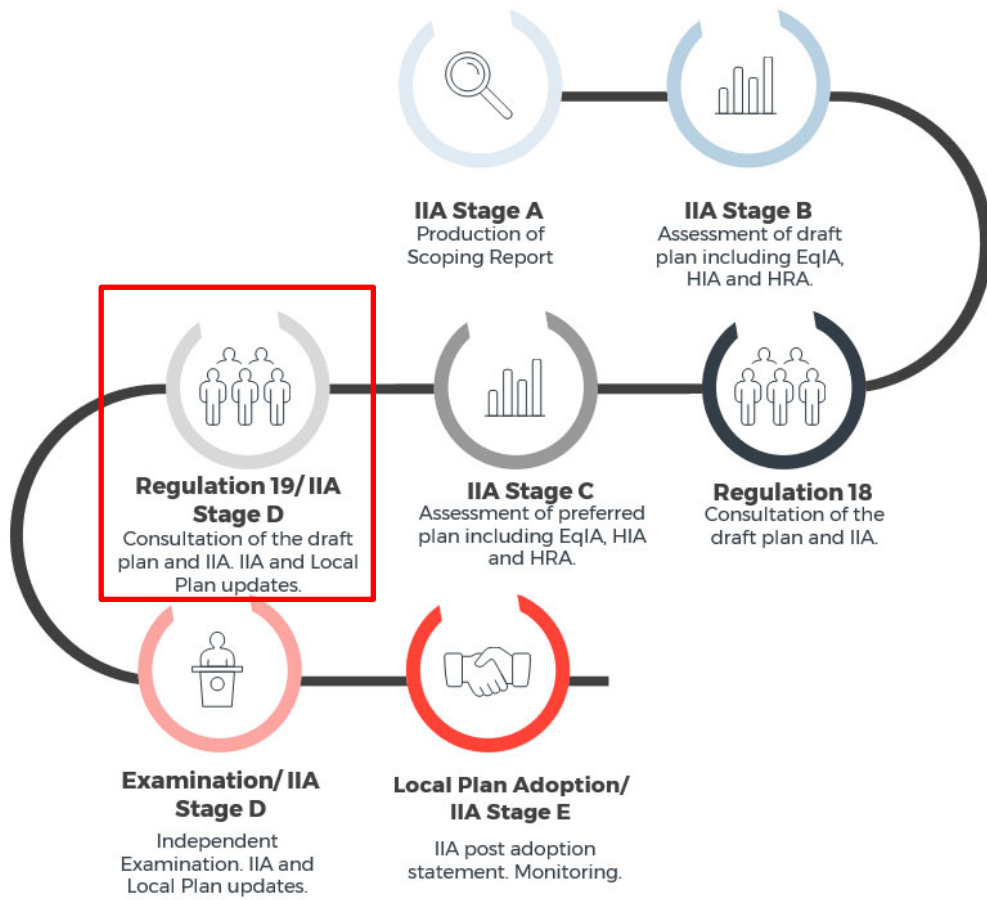
12 Next Steps

- 12.1.1. LBTH is seeking the views of statutory bodies, the public and other stakeholders on the results of the IIA. Consultation at this stage continues to ensure that the IIA provides a robust assessment of the Local Plan.
- 12.1.2. This IIA Report will be issued to consultees for consultation alongside the draft Local Plan (Regulation 19 Consultation) in Summer 2024.
- 12.1.3. An indicative timetable of the remaining stages of the IIA and Local Plan have been included in **Table 12-1** below.

Table 12-1 – Indicative Local Plan and IIA Timetable

IIA/ Local Plan Stages	Timescales
SA Report (IIA Stage C)	Spring/Summer 2024
Regulation 19 Consultation (IIA Stage D)	Summer 2024
Examination (IIA Stage D)	Early 2025
IIA Post Adoption Statement (Stage E)	Autumn/Winter 2025

Figure 12-1 - Local Plan and IIA Stages – Next Steps



Appendix A

Assurance Checklist

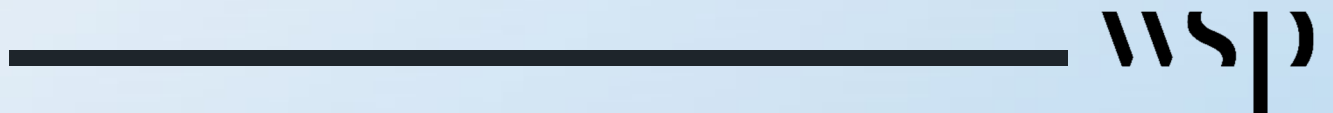




Table A-1 sets out the quality assurance checklist, taken from the Office of the Deputy Prime Minister's Practical Guide to the Strategic Environmental Assessment Directive²⁵.

Table A-1 – Quality Assurance Checklist

Item	Where this has been addressed
<i>Objectives and Context</i>	
The plan's purpose and objectives are made clear.	Section 2.3 of the Environmental Report sets out the plan's vision and objectives.
Environmental issues and constraints, including international and environmental protection objectives, are considered in developing objectives and targets	Key sustainability issues have been identified through a review of relevant plans and programmes (see Appendix E, Section 4.2 and 4.4) and analysis of baseline conditions (see Appendix D). These have informed the development of the IIA Framework presented in Section 4.4.
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate	Section 4 sets out in detail how the IIA framework has been devised.

²⁵ Office of the Deputy Prime Minister's Practical Guide to the Strategic Environmental Assessment Directive, 2005 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

Item	Where this has been addressed
Links with other related plans, programmes and policies are identified and explained.	A review of plans policies and programmes is set out in Appendix E.
Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.	Section 5 tests the compatibility of the IIA framework objectives against the Local Plan’s draft vision and objectives.
<i>Scoping</i>	
Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report	The statutory consultees were consulted on the Scoping Report between July and August 2023. Details of this have been provided in Section 4.1 and comments received are presented in Appendix C.
The assessment focuses on significant issues.	Key sustainability issues have been identified in the baseline analysis contained in Appendix D. Section 4.3 summarises the key sustainability issues identified.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit	Section 3.7 discusses the assumptions and limitations encountered.
Reasons are given for eliminating issues from further consideration.	No issues have been knowingly eliminated from the assessment at this stage.

Item	Where this has been addressed
Alternatives	
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.	Section 6.3 assesses the policy alternative, which for this reflected a 'do minimum scenario' – Application of the London Plan and a 'business as usual scenario' – Application of the existing Local Plan. Section 7.3 assess the alternative sites.
The environmental effects (both adverse and beneficial) of each alternative are identified and compared	Alternative policies and sites have both been assessed using the same criteria as the proposed policies and sites. A summary in Section 6.3 and 7.3 is provided that details their performance against the proposed allocations.
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained	Where possible, this has been highlighted within the assessment of policies and site alternatives and detailed in Sections 6.3 and 7.3.
Reasons are given for selection or elimination of alternatives.	A summary in Section 2.5, Section 6.3 and 7.3 is provided that details their performance against the proposed allocations.
Baseline Information	
Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.	Appendix D of this IIA Report presents the baseline analysis of the borough's social, economic and environmental characteristics including their likely evolution without the Local Plan.

Item	Where this has been addressed
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.	Section 3.7 sets out the criteria for assessing the spatial extent of effects. This has been further documented throughout the assessment in Appendix F and G.
Difficulties such as deficiencies in information or methods are explained.	Section 3.8 discusses the assumptions and limitations encountered.
<i>Prediction and evaluation of likely significant environmental effects</i>	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate	Sections 5 to 7 summarise the appraisal of the sustainability performance of the Local Plan. The Vision and Key objectives Policies and strategic sites are appraised. Detailed appraisal matrices are also provided at Appendix F (policies) and G (strategic sites and alternatives).
Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.	Positive and negative effects are considered within the appraisal matrices and within Sections 6 and 7. Potential effects are identified in the short, medium and long-term. The temporal scope for short-, medium- and long-term effects is defined in Section 3.7.

Item	Where this has been addressed
Likely secondary, cumulative and synergistic effects are identified where practicable.	The potential for cumulative and synergistic effects is considered in Section 9. These have also been highlighted within the assessment of policies (Appendix F) and sites (Appendix G)
Inter-relationships between effects are considered where practicable.	Inter-relationships between effects are identified in the assessment commentary, where appropriate. These have also been assessed as part of the Intra-project cumulative effects.
The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and thresholds	These have been detailed in Appendix B and identified where appropriate within the commentary for assessment.
Methods used to evaluate the effects are described.	These have been detailed in Section 3.7 and Appendix B
<i>Mitigation Measures</i>	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	These have been outlined in Section 10.
Issues to be taken into account in project consents are identified.	These have been outlined in Section 10.
<i>The Environmental Report</i>	

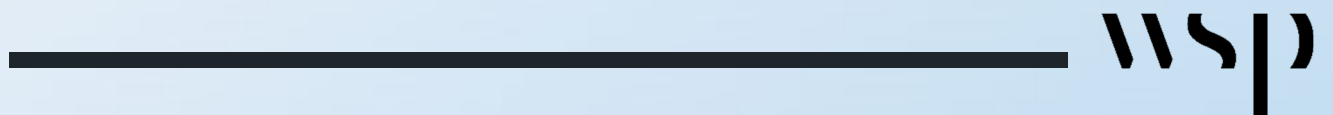
Item	Where this has been addressed
Is clear and concise in its layout and presentation	The IIA Report is clear and concise.
Uses simple, clear language and avoids or explains technical terms	Clear non-technical language has been used throughout.
Uses maps and other illustrations where appropriate.	Figure and tables have been used to present information where appropriate.
Explains the methodology used.	Methodology is set out in Section 3.7 and the thresholds for assessment are detailed in Appendix B – Scoring Criteria.
Explains who was consulted and what methods of consultation were used.	Section 2.2 sets out the work and consultation undertaken to date. The statutory consultees were consulted on the Scoping Report between July and August 2023. Details of this have been provided in Section 4.1 and comments received are presented in Appendix C. Limited responses were received from consultees for the Regulation 18 consultation.
Identifies sources of information, including expert judgement and matters of opinion	Section 3.7 and Appendix B identify sources of information used to inform the assessment.
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	A non-technical summary has been included separately.

Item	Where this has been addressed
<i>Consultation</i>	
The SEA is consulted on as an integral part of the plan-making process	The statutory consultees were consulted on the Scoping Report between July and August 2023. This IIA Report was consulted on alongside the draft Local Plan at Regulation 18 and will be consulted on again alongside the preferred Plan at Regulation 19.
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	This IIA Report was consulted on alongside the draft Local Plan and Regulation 18 and will be consulted on again as part of Regulation 19 consultation, alongside the preferred Local Plan. This will give opportunities for statutory consultees, stakeholders and members of the public to comment on the findings of the IIA.
<i>Decision-making and information on the decision</i>	
The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme	Responses received to this IIA Report to date have been set out in Appendix C.
An explanation is given of how they have been taken into account.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.

Item	Where this has been addressed
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.
<i>Monitoring measures</i>	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	Proposed monitoring measures are set out in Section 10.2. This details potential indicators and where possible are linked targets within the draft Local and London Plan.
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	This will be detailed in the post-adoption statement, which will be produced once the Local Plan has been adopted.
Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)	Proposed monitoring measures are set out in Section 10.2. These are proposed for those residual significant effects – in this case these are just uncertain effects.
Proposals are made for action in response to significant adverse effects.	

Appendix B

Assessment Criteria



This Appendix sets out the scoring criteria which has been applied to the assessment of both the policies and sites. Table B-1 sets out the overarching approach to dealing with uncertain, neutral and positive and negative effects and Table B-2 sets out the assessment thresholds for all other effects.

Table B-1 – Uncertain, Neutral and Positive/Negative Effects

Significance	Scoring Criteria
Uncertain (?)	Effects are currently uncertain as more information is needed that is not currently available or it may be dependent upon implementation.
Neutral (0)	Site/ Policy would neither help nor hinder the achievement of objectives, or there is no impact pathway.
Positive and Negative (+/-)	There are opportunities for both positive and negative effects that won't cancel each other out. Effects could be different for construction and operation. Like uncertain effects this may come down to implementation.

Table B-2 – Assessment Criteria

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Population and Equalities	IIA1: To build inclusive communities by reducing social exclusion, promoting equity, equality and respecting diversity.	Will the policy or proposal: <ul style="list-style-type: none"> Help to reduce inequalities, particularly for those people and communities most vulnerable? Improve access to services, facilities and transport for all inclusively? Support diversity? Support population growth? 	<ul style="list-style-type: none"> Population density IMD) Overall Deprivation Primary Schools Secondary Schools Higher Education Healthcare Provision (GP, dentists, pharmacies and hospitals) Children and Family Centres Community Centres Leisure Services Social Services 	Significant Positive (++)	<ul style="list-style-type: none"> The policy/ site will substantially reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. The site has existing good access to community facilities and services (predominantly G) It will ensure that the needs of all groups will be met both now and in the future. No issues identified within the EqIA.
				Minor Positive (+)	<ul style="list-style-type: none"> The policy/ site will actively reduce levels of inequalities. No new facilities are provided; however, existing facilities may be improved. It will ensure that the current needs of all groups are met. No issues identified within the EqIA, however, some recommendations/ refinements may need to be considered.
				Significant Negative (--)	<ul style="list-style-type: none"> The policy/ site will not be fully inclusive and excludes most minority groups. It will not be sufficient in meeting the needs of the local community both now and in the future and will result in a significant population growth without the facilities to support the new community. Some existing community facilities may be lost, with no further provision provided. Site may be located far away from existing community facilities and an area that is scored R for population density. No consideration has been given to the borough's changing demographic.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
					<ul style="list-style-type: none"> Substantial issues are identified within the EqIA, which are not mitigatable.
				Minor Negative (-)	<ul style="list-style-type: none"> The policy/ site will not be fully inclusive and excludes some minority groups. It will be sufficient in meeting the needs of the local community now, but not necessarily in the future. Some existing facilities are located nearby. Limited consideration has been given to the borough's changing demographic. Some issues are identified within the EqIA, which are mitigatable.
Human Health	IIA2: To improve physical and mental health and wellbeing and reduce health inequalities for all of LBTH's residents.	Will the policy or proposal: <ul style="list-style-type: none"> Promote healthier lifestyles? Increase walking and cycling? Improve quality, quantity and equality of access to green and blue space and increase opportunities for recreation? Promote health enhancing environments, behaviours and activities for local communities? Reduce inequalities? Increase inclusion and reduce loneliness? Help prevent risks to human health, which arise from noise and air pollution? Support the UK's levelling up agenda? Reduce the pressure of the rising cost of living? Increase exposure to noise and air pollution? 	<ul style="list-style-type: none"> IMD Health Deprivation Life expectancy (males and females) Primary Schools Secondary Schools Higher Education Healthcare Provision (GP, dentists, pharmacies and hospitals) Children and Family Centres Community Centres Allotments Leisure Services Social Services Sports Facilities Areas Deficient in Nature 	++	<ul style="list-style-type: none"> The policy/ site will substantially reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future. No issues identified within the HIA.
				+	<ul style="list-style-type: none"> The policy/ site will actively reduce levels of health inequalities. No new facilities are provided; however, existing facilities may be improved. It will ensure that the current needs of all groups are met. No issues identified within the HIA, however, some recommendations/ refinements may need to be considered.
				--	<ul style="list-style-type: none"> The policy/ site will not be sufficient in meeting the health and wellbeing needs of the local community both now and in the future. It will result in a significant population growth without the facilities to support the new community. Site is located in an area of high loneliness and lacks access to or consideration of new facilities and services. Site is located in an area with high noise and air pollution. Some existing community facilities may be lost, with no further provision provided. Site may be located far away from existing community facilities. No consideration has been given to the borough's changing demographic. Substantial issues are identified within the HIA, which aren't mitigatable.
				-	<ul style="list-style-type: none"> The policy/ site will be sufficient in meeting the needs of the local community now, but not necessarily in the future. Some existing facilities are located nearby. Limited consideration has been given to the borough's changing demographic. Some issues are identified within the HIA, which are mitigatable.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Economy and Employment	IIA3: To support a diverse local economy to foster sustainable economic growth and support Tower Hamlets' town centre and other district and local centres.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Improved connectivity between business clusters and housing markets? ■ Help support changing retail patterns? ■ Increase retail floorspace? ■ Increase footfall and local spending from commuters, residents and tourists? 	<ul style="list-style-type: none"> ■ Central Activities Zone ■ Tower Hamlets Activity Zone ■ Primary Shopping Areas ■ Neighbourhood Parades ■ Primary Shopping Areas ■ Town Centres (major, district and neighbourhood) 	++	<ul style="list-style-type: none"> ■ The policy/ site will improve and enhance connectivity between business clusters and the housing market. ■ The policy/ site will include proposals that will improve town centre viability and support changing retail patterns. ■ The policy/ site will provide new opportunities for a variety of different markets e.g., tourism, arts, entertainment and recreation etc.
				+	<ul style="list-style-type: none"> ■ The policy/ site will improve connectivity between business clusters and the housing market. ■ The policy/ site will include proposals that will support minor town centre improvements.
				--	<ul style="list-style-type: none"> ■ The policy/ site will decrease the connectivity between business clusters and the housing market. ■ The site/policy would result in the decline of town and local centres. ■ The policy/ site won't provide opportunities for a variety of different markets.
				-	<ul style="list-style-type: none"> ■ The policy/ site will indirectly decrease the connectivity between business clusters and the housing market. ■ The site/policy would indirectly result in the decline of town and local centres.
	IIA4: To ensure that residents have employment opportunities and access to training.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Increase job availability? ■ Improve access to employment centres? ■ Support flexible working patterns? ■ Meet the skills needs and future demand for labour? ■ Diversify the labour market? 	<ul style="list-style-type: none"> ■ IMD Employment (LSOA) ■ IMD Income (LSOA) ■ Local Industrial Location ■ Strategic Industrial locations ■ Employment sites ■ Local Employment Location ■ Higher Education 	++	<ul style="list-style-type: none"> ■ Implementation of policy will result in a significant increase in the number and diversity of jobs. ■ Site is well located to existing employment areas, and it will include some mixed used development which will provide additional employment opportunities.
				+	<ul style="list-style-type: none"> ■ Implementation of policy could indirectly result in an increase in employment opportunities. ■ Site is well located to existing employment areas which will provide additional employment opportunities.
				--	<ul style="list-style-type: none"> ■ The site/policy would result in substantial loss in job opportunities. For sites this could mean the loss of employment land for development without further employment provision being made. ■ Site is located away from other employment areas, with no employment provision made. ■ Result in the stagnation of the labour market.
				-	<ul style="list-style-type: none"> ■ The site/policy would result in some loss in job and training opportunities. ■ For sites this could mean a loss in some employment land for development with some additional employment with some additional employment opportunities being offered as part of the new development. ■ Site is located in close proximity to other employment areas.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Housing	IIA5: To meet the housing needs of all of the borough's residents inclusively.	Will the policy or proposal: <ul style="list-style-type: none"> ■ Help to sufficiently meet the borough's housing target? ■ Increase affordability? ■ Optimise proposed sites to maximise housing delivery? ■ Reduce housing deprivation? ■ Meet the needs of all groups inclusively (elderly residents, young families, disabled, ethnic minorities etc.)? ■ Support those with protected characteristics (e.g., the gypsy and traveller community)? ■ Increase the quality of existing housing stock? ■ Reduce overcrowding? 	<ul style="list-style-type: none"> ■ IMD Barriers to housing (LSOA) ■ House Prices (wards) 	++	<ul style="list-style-type: none"> ■ Policy/ site will help to meet the borough's housing target. ■ Housing will be meet the needs of all groups inclusively, both now and in the future. ■ Exceeds the NPPF affordability target of at least 10% of the total number of homes at major housing sites²⁶ ■ The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families and travellers. ■ Policy/site will provide significant improvements to the quality of existing housing stock.
				+	<ul style="list-style-type: none"> ■ Policy/ site will help to work towards meeting the borough's housing target. ■ Meets the NPPF affordability target of at least 10% of the total number of homes at major housing sites. ■ The size, type and tenure of housing takes into account different groups in the community. ■ Policy/site will provide some minor improvements to the quality of existing housing stock.
				--	<ul style="list-style-type: none"> ■ Policy/ site will fall significantly short of the borough's housing target. ■ No consideration for affordable housing and site is scored R for house prices. ■ The size, type and tenure of housing doesn't take into account different groups.
				-	<ul style="list-style-type: none"> ■ Policy/ site will fall short of meeting the borough's housing target. ■ Limited consideration for affordable housing. ■ Some consideration for size, type and tenure of housing has been made but it doesn't take into account all groups inclusively.
Crime and Safety	IIA6: To reduce crime and the fear of crime for all residents inclusively	Will the policy or proposal: <ul style="list-style-type: none"> ■ Improve safety? ■ Ensure that residents feel safe, particularly after dark? ■ Support designing out crime principals? 	<ul style="list-style-type: none"> ■ IMD Crime (LSOA) ■ Crime Rate (Ward) 	++	<ul style="list-style-type: none"> ■ Policy/ site includes designing out crime principles and measures that will significantly improve levels of safety for all residents, including the safety of women and girls. ■ Policy/ site includes measures that will improve road safety and will actively help to reduce the number of people KSI on the roads.
				+	<ul style="list-style-type: none"> ■ Policy/ site includes measures that will indirectly improve levels of safety e.g., public realm improvements. ■ Policy/ site includes measures that will improve road safety and will indirectly help to reduce the number of people KSI on the roads.

²⁶ Major is defined as 10 or more homes or a site that has an area of 0.5 hectares or more

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		<ul style="list-style-type: none"> Reduce levels of crime derivation? Improve road safety and reduce the number of people KSI on the roads, particularly children from deprived backgrounds? Create spaces where women and girls feel safe and included? 		<div style="background-color: red; color: white; text-align: center; padding: 5px;">--</div>	<ul style="list-style-type: none"> Site may be located in an area with high levels of crime rates and crime deprivation (R) with no plans for designing out crime principles. Policy/ site includes makes no consideration to improve road safety and reduce the number of people KSI on the roads.
				<div style="background-color: yellow; color: black; text-align: center; padding: 5px;">-</div>	<ul style="list-style-type: none"> Site may be located in an area with high levels of crime rates and crime deprivation with minimal plans for designing out crime principles. Policy/ site includes makes limited consideration to improve road safety and reduce the number of people KSI on the roads.
Transport and Accessibility	IIA7: To promote traffic reduction, by encouraging more sustainable alternative transport modes, and supporting residents to live more locally.	Will the policy or proposal: <ul style="list-style-type: none"> Support the use of sustainable transport modes? Reduce demand for use of the private car and facilitate a modal shift to more sustainable modes? Support EV infrastructure? 	<ul style="list-style-type: none"> Public Transport Accessibility Levels (PTAL) Bus Stops National Rail Train Station/ Tube Station National Cycle Network London Cycle Network Cycle Hire Station Cycle Superhighway EV Charge Point 	<div style="background-color: green; color: white; text-align: center; padding: 5px;">++</div>	<ul style="list-style-type: none"> Site is located within an area with existing good access to public transport (G for PTAL) and further provision is made as part of the development. Policy supports the development of sustainable transport modes contributing to a significant modal shift.
				<div style="background-color: lightgreen; color: black; text-align: center; padding: 5px;">+</div>	<ul style="list-style-type: none"> Site is located in an area with existing good access to public transport (G for PTAL), but limited provision of new sustainable transport is made to support future population growth. Site is well located to local facilities and services allowing residents to live their lives more locally. Policy may indirectly contribute to a modal shift.
				<div style="background-color: red; color: white; text-align: center; padding: 5px;">--</div>	<ul style="list-style-type: none"> Site has poor access to public transport (R for PTAL) and no further provision is made as part of the new development. Site is poorly located to local facilities and services and will increase the need to travel by car. Policy will directly contribute to an increase demand for private vehicle use
				<div style="background-color: yellow; color: black; text-align: center; padding: 5px;">-</div>	<ul style="list-style-type: none"> Site has average access to public transport (A for PTAL), but limited provision of new sustainable transport is made to support future population growth. Site has some local facilities within walking distance, however, not all needs will be met and there may be some increased need to travel. Policy may indirectly contribute to an increase demand for private vehicle use.
	IIA8: To protect and enhance access to essential services and facilities for all residents.	Will the policy or proposal: <ul style="list-style-type: none"> Improve access to services, facilities and transport? Ensure that all groups can access services 	<ul style="list-style-type: none"> Public Transport Accessibility Levels (PTAL) Bus Stops National Rail Train Station/ Tube Station Primary Schools Secondary Schools 	<div style="background-color: green; color: white; text-align: center; padding: 5px;">++</div>	<ul style="list-style-type: none"> Site is located within an area with existing good access to services and facilities (predominantly scored G) Services are easily accessed by all groups inclusively. Site/ Policy supports the development of further facilities and services to meet the needs of the population both now and in the future. Policy/ site fulfils the requirements of the Healthy Streets Indicators
				<div style="background-color: lightgreen; color: black; text-align: center; padding: 5px;">+</div>	<ul style="list-style-type: none"> Site is well located to local facilities and services allowing residents to live their lives more locally.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		<p>and facilities inclusively?</p> <ul style="list-style-type: none"> Incorporate a 'Healthy Streets' approach?²⁷ 	<ul style="list-style-type: none"> Higher Education Healthcare Provision Children and Family Centres Community Centres Leisure Services Social Services Sports Facilities Primary Shopping Areas Neighbourhood Parades Primary Shopping Areas Town Centres (major, district and neighbourhood) 	<p>Green</p> <p>Red --</p> <p>Yellow -</p>	<ul style="list-style-type: none"> Site/ policies do not propose any new facilities; however, existing facilities may be improved. Policy/ site fulfils some of the requirements of the Healthy Streets Indicators Site is located within an area with poor access to services and facilities (predominantly scored R) Site/ policies do not propose any new facilities or services and will not meet the needs of the population both now and in the future. Some groups may be excluded. Policy/ site works against the Healthy Streets Indicators Site has average access to facilities and services (A for PTAL), but limited provision of new facilities is made to support future population growth. Site/ policies do propose some new facilities/ services or some upgrades to existing facilities/ services, however, these may not meet the needs of all groups inclusively.
Biodiversity and Natural Capital	IIA9: To protect and enhance protected habitats, species and valuable ecological networks that contribute to ecosystem functionality in Tower Hamlets, contributing to biodiversity net gain.	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> Cause damage to locally and nationally designated sites through infrastructure provision, increased development, recreational pressures, traffic or maintenance? Maintain and enhance biodiversity in the borough? Seek opportunities for biodiversity for at least 10% net gain? Increase provision of ecosystem services 	<ul style="list-style-type: none"> LNR NNR Priority Habitat SINC SAC SSSI SPA Green Grid Network 	Green ++	<ul style="list-style-type: none"> Site/ policy will maintain, protect and enhance protected habitats, species and valuable ecological networks. Site/ policy will achieve >10% BNG Support and enhance habitat connectivity Site is located away from any national/ local designations (predominantly G) HRA doesn't identify any potential likely significant effects . Site will contribute to the Green Grid Network.
				Green +	<ul style="list-style-type: none"> Site/ policy will maintain protected habitats, species and valuable ecological networks. Site/ policy will achieve 10% BNG Site is located away from any national/ local designations (a mix of G with some A) HRA doesn't identify any potential likely significant effects.
				Red --	<ul style="list-style-type: none"> Site/ policy will result in the fragmentation of habitats and species and deterioration of designated sites. Site/ policy will result in a significant net loss of biodiversity (>10%) Site is located within an NNR, SAC, SSSI and/ or SPA. Site is located within a SINC or LNR and no contribution is made to biodiversity net gain.

²⁷ Transport for London, Healthy Streets for London, [online] available at: <https://content.tfl.gov.uk/healthy-streets-for-london.pdf>

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		<p>from the borough's natural capital?</p> <ul style="list-style-type: none"> Prevent fragmentation of habitats and promote ecological networks? Result in developments which will improve biodiversity on site? 		<div style="background-color: red; width: 100px; height: 20px;"></div>	<ul style="list-style-type: none"> HRA identifies likely significant effects. Severe the Green Grid Network
				<div style="background-color: yellow; width: 100px; height: 20px; text-align: center;">-</div>	<ul style="list-style-type: none"> Site/ policy will result in the fragmentation of habitats and species and deterioration of designated sites. Site/ policy will result in a net loss of biodiversity (<10%) Site is located within close proximity to NNR, SAC, SSSI and/ or SPA. Site is located within SINC or LNR but site will contribute to BNG. There may be some temporary short-term negative effects on biodiversity as a result of construction activities.
Landscape and Townscape	IIA10: To protect and enhance the borough's townscapes and landscapes.	<p>Will the policy or proposal:</p> <ul style="list-style-type: none"> Respect, maintain and strengthen local character and distinctiveness? Achieve high quality sustainable design for buildings, spaces and the public realm? Improve the quality and condition of the townscape and landscape? Improve the quality of parks and open spaces? Incorporate green and blue infrastructure into design? 	<ul style="list-style-type: none"> Borough Designated Views London View Management Framework Tall Building Zone Strategically Important Skyline London Squares Local Open Space Metropolitan Open Land Green Grid Network 	<div style="background-color: green; width: 100px; height: 20px; text-align: center;">++</div>	<ul style="list-style-type: none"> The site/ policy will respect, maintain, and strengthen local character and distinctiveness. The site/ policy will ensure high quality design which is sympathetic to the local townscape and landscape. The site will incorporate green and blue infrastructure as part of design. The site/ policy will increase, protect and enhance the public realm, parks and open spaces.
				<div style="background-color: lightgreen; width: 100px; height: 20px; text-align: center;">+</div>	<ul style="list-style-type: none"> The site/ policy will ensure high quality design which is sympathetic to the local townscape and landscape. The site will incorporate green and blue infrastructure as part of design.
				<div style="background-color: red; width: 100px; height: 20px; text-align: center;">--</div>	<ul style="list-style-type: none"> The site/ policy will result in unsympathetic design which will deteriorate the local landscape and townscape (including tall building zones, strategically important skyline and designated views). The site/ policy will result in tall buildings outside of the Tall Building Zone. The site/ policy will result in the loss of parks and open spaces and public realm, without any additional provision provided.
				<div style="background-color: yellow; width: 100px; height: 20px; text-align: center;">-</div>	<ul style="list-style-type: none"> There may be some temporary short-term negative effects on the local landscape and townscape as a result of construction activities. The site/ policy will result in the loss of parks and open spaces and public realm, but additional provision will be provided as part of design.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
Historic Environment	IIA11: To protect and enhance the historic environment, including heritage assets (designated, non-designated, and heritage at risk) and their settings.	Will the policy or proposal: <ul style="list-style-type: none"> Conserve and/or enhance heritage assets, their setting and the wider historic environment? Contribute to the better management of heritage assets and contribute to conserving heritage at risk? Improve the quality and condition of the historic environment? Respect, maintain and strengthen local character and distinctiveness? 	<ul style="list-style-type: none"> Listed Buildings Registered Parks and Gardens Scheduled Monuments Heritage at risk Conservation areas Archaeological Priority Area 	++	<ul style="list-style-type: none"> The policy/ site will result in enhancements to designated and non-designated heritage assets and/or their setting, fully taking into consideration the significance and value of the asset. Local character will be respected and enhanced.
				+	<ul style="list-style-type: none"> The policy/ site will result in enhancements to designated and non-designated heritage assets and/or their setting. Local character will be respected and maintained.
				--	<ul style="list-style-type: none"> The policy/ site would diminish the significance of designated heritage assets and/or their setting. There would be major damage to designated and non-designated heritage assets (including buried archaeological sites/remains). The site is located within a conservation area and makes no consideration to sympathetic design.
				-	<ul style="list-style-type: none"> The policy/ site will result in the loss of significance of undesignated heritage assets. The setting of heritage assets is likely to be short term and temporary.
Water Environment	IIA12: To reduce the risk and vulnerability to flooding.	Will the policy or proposal: <ul style="list-style-type: none"> Reduce the risk of flooding? Result in urban creep? Increase surface runoff? 	<ul style="list-style-type: none"> Flood Zone Flood Risk Area Critical drainage area 	++	<ul style="list-style-type: none"> The policy/ site would result in a significant reduction to flood risk. Design incorporates SuDs, nature-based solutions and other flood alleviation measures.
				+	<ul style="list-style-type: none"> The policy/ site would indirectly result in an improvement to flood risk.
				--	<ul style="list-style-type: none"> The site is located within a flood zone 3. Site is located within a critical drainage area. No measures have been put in place to mitigate and alleviate flood risk Site/ policy will encourage urban creep
				-	<ul style="list-style-type: none"> The site is located in a flood zone 2. Site is located within a critical drainage area Some measures have been put in place to mitigate flood risk.
	IIA13: To maintain and enhance water quality.	Will the policy or proposal: <ul style="list-style-type: none"> Support the protection and enhancement of water bodies? Result in the reduction of water quality? 	<ul style="list-style-type: none"> Statutory Main River Water Spaces 	++	<ul style="list-style-type: none"> The policy/ site would make a significant improvement in surface water quality and/ or in groundwater quality. Water spaces will be improved and enhanced.
				+	<ul style="list-style-type: none"> The policy/ site would contribute to a minor or indirect improvement in surface water quality or in groundwater quality.
			--	<ul style="list-style-type: none"> The policy/ site would have a major effect on fluvial and groundwater quality and lead to long term or continuous effects on receptors (e.g., designated habitats, or recreational users) that cannot reasonably be mitigated. 	

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
				-	<ul style="list-style-type: none"> Site is located <16m away from a water course
				-	<ul style="list-style-type: none"> The policy/ site would have a minor effect on fluvial and ground water quality and lead to short term or intermittent effects on receptors (e.g., protected species or recreational users). Site is located <50m away from a water course. These effects are likely to be short term and are unlikely to be avoided but could be mitigated.
Air Quality	IIA14: To protect and enhance air quality.	Will the policy or proposal: <ul style="list-style-type: none"> Support measures to reduce levels of air pollution? Help to improve air quality? Support measures for the reduction of congestion and traffic levels particularly in AQMAs and congestion hot-spots? 	<ul style="list-style-type: none"> NO₂ PM₁₀ Motor Vehicle restricted area Air Quality Focus Areas 	++	<ul style="list-style-type: none"> The policy/ site would result in a major enhancement of the air quality. The policy/ site would substantially reduce levels of traffic and congestion.
				+	<ul style="list-style-type: none"> The policy/ site would indirectly result in the enhancement of air quality. The policy/ site would indirectly reduce levels of traffic and congestion.
				--	<ul style="list-style-type: none"> The policy/ site would result in a major decrease in the air quality. The policy/ site would substantially increase levels of traffic and congestion.
				-	<ul style="list-style-type: none"> The policy/ site would indirectly result in a decrease of the air quality. The policy/ site would indirectly increase levels of traffic and congestion.
Climate Change and Greenhouse Gases	IIA15: Ensure that Tower Hamlets is resilient to the effects of climate change.	Will the policy or proposal: <ul style="list-style-type: none"> Contribute further to the urban heat island effect? Ensure new development is designed to mitigate overheating risk? Increase the resilience of infrastructure and material assets to the impacts of climate change (including flood 	<ul style="list-style-type: none"> Overall Climate Risk Overall Heat Risk Flood Zone Flood Risk Area 	++	<ul style="list-style-type: none"> The policy/site would have a major positive effect on increasing the resilience/ decreasing the vulnerability to climate change effects.
				+	<ul style="list-style-type: none"> The policy/site would have a minor positive effect on increasing the resilience/ decreasing the vulnerability to climate change effects.
				--	<ul style="list-style-type: none"> The policy/site would have a major negative effect on resilience/ significantly decrease vulnerability to climate change effects. The site is located within a combination of the following: overall climate risk, overall heat risk, flood zone 3 and/or flood risk area.

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
		risk, extreme weather, heat and cold)?		-	<ul style="list-style-type: none"> The policy/ site would not increase resilience/decrease vulnerability to climate change effects; however, the site isn't currently vulnerable to the effects of climate change.
	IIA16: To reduce greenhouse gas emissions, support national and local decarbonisation initiatives and encourage energy efficiency.	Will the policy or proposal: <ul style="list-style-type: none"> Support low carbon and energy efficient design? Contribute to reducing emissions as per the Paris Agreement? Support the borough's Net Zero ambitions by 2045? Increase renewable energy generation? Support low carbon, energy efficient design? Reduce levels of embodied carbon? 	<ul style="list-style-type: none"> NO₂ PM₁₀ Motor Vehicle restricted area 	++	<ul style="list-style-type: none"> The policy/ site will support opportunities for renewable energy production. The policy/ site will reduce GHG emissions and provide new infrastructure/assets that maximise the use of renewable energy sources. The option would provide opportunities for significant carbon sequestration
				+	<ul style="list-style-type: none"> The policy/ site will support opportunities for renewable energy production. The policy/ site will reduce GHG emissions. The option would provide opportunities for carbon sequestration
				--	<ul style="list-style-type: none"> The policy/ site results in a major increase in energy consumption with no renewable energy options. The construction/operation of the site would involve a significant amount of embodied carbon. The option would result in major or long-term increases in operational GHGs
				-	<ul style="list-style-type: none"> The policy/ site results in a minor increase in energy consumption with no renewable energy options. The policy/ site would result in a minor increase in GHGs emissions; however, this would be temporary.
Material Assets (including Soil Resources)	IIA17: To reduce the amount of waste produced and minimise the amount sent to landfill	Will the policy or proposal: <ul style="list-style-type: none"> Minimise the amount of waste? Support the waste hierarchy? Support the use of sustainable materials? 	<ul style="list-style-type: none"> Waste management sites Safeguarded Wharves 	++	<ul style="list-style-type: none"> The policy/ site will re-purpose existing infrastructure and re-use or recycle substantial quantities of waste materials.
				+	<ul style="list-style-type: none"> The policy/ site will re-use or recycle moderate quantities of waste materials.
				--	<ul style="list-style-type: none"> The policy/ site will require significant new infrastructure that cannot be provided through the re-use or recycling of waste materials.
				-	<ul style="list-style-type: none"> The policy/ site will require new infrastructure with only limited opportunities for the re-use or recycling of waste materials.
		Will the policy or proposal: <ul style="list-style-type: none"> Brownfield Land 	++	<ul style="list-style-type: none"> The policy/ site is located on a brownfield site and has no effect on soils or existing land use. 	

IIA Topic	IIA Objective	IIA Supporting Appraisal Questions	RAG Datasets	Significance	Scoring Considerations
	IIA18: To ensure the efficient use of land, promote sustainable use of resources and seek opportunities to promote a circular economy.	<ul style="list-style-type: none"> Support the use of brownfield land? Seek to use sustainable construction methods and materials? Support the use of sustainable materials? Use locally sourced materials? 		<div style="background-color: green; width: 20px; height: 20px; margin-bottom: 5px;"></div> <div style="background-color: #90EE90; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">+</div> <div style="background-color: red; width: 20px; height: 20px; margin-bottom: 5px; text-align: center; line-height: 20px;">--</div> <div style="background-color: yellow; width: 20px; height: 20px; text-align: center; line-height: 20px;">-</div>	<ul style="list-style-type: none"> Any new infrastructure will incorporate substantial sustainable design measures and materials. The policy/ site is predominantly located on a brownfield site and has no effect on soils or existing land use. Any new infrastructure will incorporate some sustainable design measures and materials. The policy/ site will result in a major loss in greenfield land or is in substantial conflict with existing land use. There are no opportunities for sustainable design or the use of sustainable materials The policy/ site will result in some loss in greenfield land or is in conflict with existing land use. There are limited opportunities for sustainable design or the use of sustainable materials.

Table B-3 sets out the criteria used for each of the indicators used for the RAG assessment.

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
IIA1: Population and Equalities	Population density (Ward)	Higher than the borough average (15,695p/h)	Higher than the London but lower than the borough average	Lower than the London average (5,598p/h)	
	IMD Overall deprivation (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	
	Primary Schools	>3.2km	<3.2km	<1km	Department for Education (DfE), Home to School Transport and Travel Guidance, 2014 ²⁸
	Secondary Schools	>4.8km	<4.8km	<1 km	DfE Home to School Transport and Travel Guidance, 2014
	Higher Education	>4.8km	<4.8km	<1 km	DfE Home to School Transport and Travel Guidance, 2014

²⁸ Department for Education (DfE), Travel to school for children of compulsory school age Statutory guidance for local authorities, 2014 [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1165730/Travel to school for children of compulsory school age.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1165730/Travel_to_school_for_children_of_compulsory_school_age.pdf)

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
IIA2: Health and Wellbeing	IMD Health (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	Life Expectancy - Female (Ward)	Worse than the national average (<81.7)	Similar to the national average (81.7-84.1)	Higher than the national average (84.1-87.9)	Professional judgement
	Life Expectancy - Male (Ward)	Worse than the national average (<77.9)	Similar to the national average (77.91-80.2)	Higher than the national average (80.21-84.7)	Professional judgement
	Healthcare (GPs, dentists, pharmacies, hospitals)	>800m		<800m	Chartered Institution of Highways & Transportation (CIHT) - Planning for Walking, 2015 ²⁹
	Allotments		>800m	<800m	CIHT - Planning for Walking, 2015
	Children and family Centres	>800m		<800m	CIHT - Planning for Walking, 2015
	Community Centres	>800m		<800m	CIHT - Planning for Walking, 2015
	Leisure services	>800m		<800m	CIHT - Planning for Walking, 2015
	Social services	>800m		<800m	CIHT - Planning for Walking, 2015
	Parks and open spaces	>800m		<800m	CIHT - Planning for Walking, 2015
	Sports facilities	>800m		<800m	CIHT - Planning for Walking, 2015
	Areas deficient in nature	Within		Outside	Professional Judgement
IIA3/4: Economy and Employment	IMD Employment (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	IMD Income (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	Central Activities Zone		Outside	Within/intersect	Professional judgement
	Tower Hamlets Activity Areas		Outside	Within/intersect	Professional judgement
	Local Industrial Location	>800m		<800m	CIHT - Planning for Walking, 2015
	Strategic Industrial locations	>800m		<800m	CIHT - Planning for Walking, 2015
	Employment sites	>800m		<800m	CIHT - Planning for Walking, 2015
	Local Employment Location	>800m		<800m	CIHT - Planning for Walking, 2015

²⁹ Chartered Institution of Highways & Transportation, Planning For Walking, 2015 [online] available at: https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	Primary Shopping Areas	>800m		<800m	CIHT - Planning for Walking, 2015
	Neighbourhood Parade	>800m		<800m	CIHT - Planning for Walking, 2015
	Primary Shopping Areas	>800m		<800m	CIHT - Planning for Walking, 2015
	Town Centres (major, district and neighbourhood)	>800m		<800m	CIHT - Planning for Walking, 2015
IIA5: Housing	IMD Barriers to housing (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional judgement
	House Prices (wards)	Exceeds London Average	Exceeds national average but below London Average	In line with England Average	Professional judgement
IIA6: Crime and Safety	IMD Crime (LSOA)	10%-20% most deprived	30-50% most deprived	10-20% least deprived	Professional Judgement
	Crime Rate (Ward)	Worse than the borough average (>127.5 per 1,000)	Higher than the London but lower than the Borough average	Lower than the London average (<95 per 1,000)	Professional Judgement
IIA7/8: Transport and Accessibility	PTAL	0, 1a, 1b,	2, 3, 4	5, 6a, 6b	TfL - Assessing transport connectivity in London
	Bus Stops	>400m	200-400m	<200m	CIHT - Planning for Walking, 2015
	Train Station	>800m		<800m	CIHT - Planning for Walking, 2015
	Tube Station	>800m		<800m	CIHT - Planning for Walking, 2015
	National Cycle Network	Site is not connected to national cycle network		Site is connected to national cycle network	Professional judgement
	London Cycle Network	Site is not connected to London Cycle network		Site is connected to London Cycle network	Professional judgement
	Cycle Hire Station	>400m	200-400m	<200m	Professional judgement
	Cycle Superhighway	Site is not connected to cycle superhighway		Site is connected to cycle superhighway	Professional judgement
IIA9: Biodiversity and Natural Capital	EV Charge Point		>200m	<200m	Professional judgement
	Local Nature Reserve	<0.01 km	< 0.8km	>0.8km	Professional judgement
	National Nature Reserve	<0.01 km	< 0.8km	>0.8km	Professional judgement
	Priority Habitat Inventory	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SiNC	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SAC	<0.01 km	< 0.8km	>0.8km	Professional judgement

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	SSSI	<0.01 km	< 0.8km	>0.8km	Professional judgement
	SPA	<0.01 km	< 0.8km	>0.8km	Professional judgement
IIA10: Landscape and Townscape	Borough Designated Views	Within/adjacent		Outside	Professional judgement
	London View Management Framework	Within/adjacent		Outside	Professional judgement
	Tall Building Zone	Within Zone		Outside	Professional judgement
	Strategically Important Skyline	Within/adjacent		Outside	Professional judgement
	London Squares	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	Professional judgement
	Local Open Space	Within/adjacent		Outside	Professional judgement
	Metropolitan Open Land	Within/adjacent		Outside	Professional judgement
	Green Grid	Within/adjacent		Outside	Professional judgement
IIA11: Historic Environment	Listed Buildings	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	Historic England (HE) 'The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 3' ³⁰
	Registered Parks and Gardens	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Scheduled Monuments	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Heritage at risk	<0.01 km straight line	<0.025km straight line	>0.025 km straight line	HE Advice Note 3
	Conservation areas	Within/adjacent		Outside	HE Advice Note 3
	Archaeological Priority Area	Within/adjacent		Outside	HE Advice Note 3
IIA12: Flood Risk	Flood Zone	Flood Zone 3	Flood Zone 2	Flood Zone 1	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3 ³¹

³⁰ Historic England, 'The Historic Environment and Site Allocations in Local Plans. Historic England Advice Note 3 [online] available at: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

³¹ Defra, Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3, 2017 [online] available at: <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3>

IIA Objective	Dataset Name	Assessment criteria			Rationale / Notes
		Red	Amber	Green	
	Flood Risk Area		Yes	No	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
IIA13: Water Quality	Statutory Main River	<16m	<50m	>50m	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
	Water Spaces	<16m	<50m	>50m	Planning Practice Guidance – Flood Risk Assessment in Flood Zones 2 & 3
	Critical drainage area		>15% of the site is within CDA	<15% of the site is within a CDA	Professional judgement
IIA14: Air Quality/ IIA16: Greenhouse Gases	NO ₂	>43µ/m ³	>28-43µ/m ³	<16 - 28µ/m ³	Professional judgement
	PM ₁₀	>43µ/m ³	>28-43µ/m ³	<16 - 28µ/m ³	Professional judgement
	Motor Vehicle restricted area		Outside	Within/intersect	Professional judgement
	Air Quality Focus Areas	Within		Outside	Professional judgement
IIA15: Climate Resilience	Overall Climate Risk	High	Medium & Medium-High	Low & Low-Medium	Greater London Authority's (GLA) Climate Risk Mapping Methodology ³²
	Overall Heat Risk	High	Medium	Low	GLA Climate Risk Mapping Methodology
IIA17: Waste	Waste management sites	Within/adjacent		Outside	Professional judgement
	Safeguarded Wharves	Within/adjacent		Outside	Professional judgement
IIA18: Efficient use of resources	Brownfield land	No	Part	Yes	Professional judgement

³² Greater London Authority, Climate Risk Mapping, 2022 [online] available at: https://data.london.gov.uk/dataset/climate-risk-mapping?_gl=1%2a1bed0y2%2a_ga%2aMTQ1MjkzNzM5LjE2OTA5ODA3NDI.%2a_ga_PY4SWZN1RJ%2aMTY5NDAXNzUxOC4xMC4wLjE2OTQwMTc1MTguNjAuMC4w

Appendix C

Consultation Comments

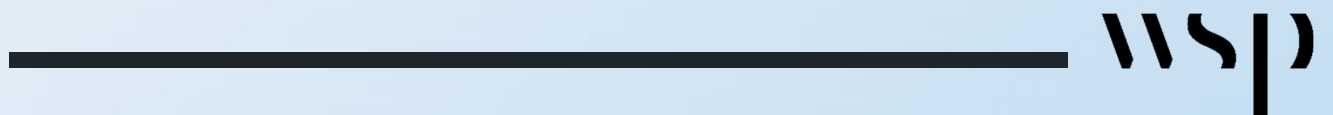




Table C-1 below sets out the consultation comments received from the Statutory consultees on the IIA Scoping Report. The table sets out how and where these comments have been addressed. No specific comment on the IIA were received from the Regulation 18 consultation.

Table C-1 –Consultation Comments

ID	Consultee	Comment	Response
1	Natural England	Natural England have no comments to make on this consultation.	Noted – no response required
2	Historic England	In terms of the historic environment, we consider that the Report has identified the majority of plans and programmes which are of relevance to the development of the Local Plan, that it has established an appropriate Baseline against which to assess the Plan’s proposals and that it has put forward a suitable set of Objectives and Indicators. Overall, therefore, we believe that it provides the basis for the development of an appropriate framework for assessing the significant effects which this plan might have upon the historic environment.	Noted – no response required
3	Historic England	Historic England strongly advises that the conservation team of your authority and your archaeological advisors are closely involved throughout the preparation of the SA of this Plan. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse	The team will continue to engage and consult with Historic England throughout the IIA/ Local Plan process.

ID	Consultee	Comment	Response
		<p>impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment.</p>	
4	Historic England	<p>Table 4-1 Key Messages - Policy D9 of the London Plan 2021 is clear that in assessing and identifying appropriate locations for tall buildings, local plans should ensure that they avoid adverse impacts on the historic environment.</p>	<p>Table 4-1 in the IIA Report has been amended to the following “Ensure tall buildings are designed acceptably and situated in appropriate areas that avoid adverse impacts on heritage assets; ...’</p>
5	Historic England	<p>Table 4-1 Key Messages - A number of policies in the London Plan 2021 (notably D3 Optimising Site Capacity through the design-led approach and HC1 Heritage conservation and growth) also indicate that an understanding of heritage significance should be used to help inform and shape the design of new development to respond to context.</p>	<p>Table 4-1 in the Interim IIA Report has been amended to the following</p> <p>Addition of an extra bullet point which states</p> <p>‘Ensure that new development uses existing historic character and heritage significance to guide new development and respond appropriately to its context’</p> <p>Added at end of final existing bullet point</p> <p>‘ .. and positive place-shaping, including through using heritage assets as visitor attractions and the provision of visitor infrastructure.’</p>

ID	Consultee	Comment	Response
6	Historic England	Table 5-11 Issues and opportunities for the historic environment - See comments above in relation to London Plan policies D3 and HC1	Table D-11 and Table 4-1 in the IIA Interim report have been updated to include the following additional bullet - The NLP should ensure that the local historic environment (including the archaeological resource) informs design proposals, public realm and landscaping schemes to help ensure that heritage assets and their settings are enhanced.
7	Historic England	Table 6-1 IIA Appraisal Framework - Climate change is acknowledged as a risk for the historic environment earlier in the document. It should be made explicit here that well-intentioned but inappropriate interventions on historic buildings should be avoided.	Table D-11 and Table 4-1 in the IIA Interim report have been updated to include the following additional bullet - Climate change is acknowledged as a risk for the historic environment earlier in the document. It should be made explicit here that well-intentioned but inappropriate interventions on historic buildings should be avoided.
8	Historic England	Table A9 – Add Historic England Advice Note 4 (March 2022) Tall Buildings and London Borough of Tower Hamlets conservation area appraisals	Both documents have been added to Table E9 in the Interim IIA Report
9	Environment Agency	Table 4-1 Key Messages – Biodiversity and Natural Capital – Support inclusion of the important role of habitat connectivity. Suggest including wording in relation to Biodiversity Net Gain (BNG) to explain how	Table 4-1 in the IIA Interim Report has been updated to include the following Added within the first existing bullet point

ID	Consultee	Comment	Response
		developments must ensure appropriate habitat is created.	<p>‘...along with the important role habitat connectivity plays in building strong green and blue networks that protect and enhance biodiversity and natural capital...’</p> <p>Added at the end of the final existing bullet point</p> <p>‘...Developments must ensure appropriate habitat is created that will be of importance to habitat connectivity, provide ecologically enhanced green and blue spaces, and incorporate long-term management plans.’</p>
10	Environment Agency	Table 4-1 Key Messages – Material Assets – Note that whilst protecting groundwater quality has been considered, the need to protect groundwater quantity should also be addressed.	<p>Table 4-1 in the IIA Interim Report has been updated to include the following</p> <p>Addition of an extra bullet point (note: within Water Environment not Material Assets) which states</p> <p>‘Protect and enhance groundwater quantity and ensure that development does not place a burden on groundwater flow or quantity’.</p>
11	Environment Agency	5 Baseline – Transport and Accessibility – Recommend consideration is given to site selection for new infrastructure; to be located away from areas of high flood risk and where road drainage may impact on water, and to account for future climate change. Opportunity to advocate maximising opportunities to integrate	<p>Table 5-7 in the IIA Interim Report has been updated to include the following</p> <p>‘Site selection should account for future climate change, and consider locating transport infrastructure away from areas of</p>

ID	Consultee	Comment	Response
		connected blue and green infrastructure (BGI) along transport corridors.	<p>high flood risk, or where road drainage may impact on water quality issues</p> <p>The NLP should maximise opportunities to integrate connected blue and green infrastructure along transport corridors'</p>
12	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Biodiversity Net Gain (BNG) – Worth mentioning the frameworks that underpin BNG, particularly in relation to watercourses.	<p>Table 5-8 in the IIA Interim Report and Table 4-1 in the IIA Interim report have been updated to include the following</p> <p>'...including consideration of watercourses from the start of the design process in order to maintain the increase in biodiversity over the statutory 30 year period. Developments that seek to create habitat to support species identified as declining should be prioritised.'</p>
13	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Tree Planting – Note that trees planted under council initiatives must be diverse and native species.	<p>Section 8 of Appendix D of the IIA Interim Report has been updated to include the following</p> <p>Addition of an extra sentence which states 'Trees that are planted must be diverse and native species.'</p>
14	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Issues and Opportunities – Recommend stronger, more detailed wording. Refer to the expectation of development	Table D-8 and Table 4-1 in the IIA Interim Report have been updated to include the following

ID	Consultee	Comment	Response
		adjacent to watercourses to contribute to achieving Water Framework Directive (WFD) objectives.	Addition of an extra bullet point which states 'Development adjacent to watercourses are expected to contribute to achieving Water Framework Directive objectives relating to ecological status; this includes connectivity for fish and removal of invasive species'
15	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Implications for the NLP – Support the inclusion of wording to reduce the use of hard engineering for future development.	Table D-8 in the IIA Interim Report has been amended to include the following 'The NLP will need to encourage development opportunities to remove in-channel structures when present within the watercourse, the use of hard engineering should require strong justification'
16	Environment Agency	5 Baseline – Biodiversity and Natural Capital – Key Risks/Opportunities – Recommend actions in relation to the Water Framework Directive (WFD) are considered. Suggest a map of the watercourses and associated WFD status would be useful. Also recommend consideration is made regarding invasive non-native species and their management.	WFD has been considered within the 'Water Environment' section of the baseline (Appendix D). This include the ecological status of water bodies. A map of waterbodies hasn't been included but will be used as part of the site assessments.
17	Environment Agency	5 Baseline – Water Environment – Recommend it is made clear that the WFD also includes groundwater water bodies. Refer to Greenwich Tertiaries and Chalk and its classification.	Appendix D of the IIA Interim Report have been updated to include the following 'The WFD also includes groundwater water bodies, with the objective of achieving 'good'

ID	Consultee	Comment	Response
			<p>quantitative and chemical status. The borough contains one such groundwater body, Greenwich Tertiaries and Chalk, which currently has 'poor' chemical and quantitative classification.'</p>
18	Environment Agency	<p>5 Baseline – Water Environment – Issues and Opportunities – Water quality and flood risk should have their own separate subsections. Details are given on the recommended content for each theme.</p>	<p>Table D-13 in the IIA Report and Table 4-1 in the IIA Interim Report have been amended to include the following</p> <p>'...in addition to existing residual flood risk in the event of a breach or failure of the flood defences.'</p> <p>Table D-13 in the IIA Report has been updated to include the following</p> <p>Addition of extra bullet points that state</p> <p>'The NLP should promote that development in close proximity to a watercourse should include the addition of naturalised features to buffer zones to connect the river to the riparian zone, create natural flood management (NFM) schemes, and promote biodiversity.'</p> <p>'The NLP should seek to protect groundwater quality as a water resource. '</p> <p>'The NLP should ensure that development in close proximity to a watercourse should</p>

ID	Consultee	Comment	Response
			<p>include provision of natural, undeveloped buffer zones. These can help contribute to natural flood management (NFM) whilst also allowing access for maintenance and emergency works.'</p> <p>'The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames.'</p>
19	Environment Agency	5 Baseline – Air Quality – Recommend the borough commits to and considers how to deliver an air quality neutral and air quality positive approach. Encourage consideration is also given to how an air quality approach can be linked to other policies.	For consideration by LBTH
20	Environment Agency	5 Baseline – Climate Change and Greenhouse Gases – Issues and Opportunities – Expand the point regarding flooding under the need to implement and facilitate climate change adaptation. Opportunity to discuss the implementation of Nature-based solutions (NbS) to build resilience to climate impacts. Consider habitat connectivity and ensuring wild refuge areas are maintained as fundamentals of creating resilient functioning ecosystems. Recommend creation of new re-naturalised areas. Advise setting a target for the percentage of wild cover within green spaces.	<p>Table D-16 has been updated to include the following:</p> <p>'The NLP should promote the implementation of Nature-based solutions (NbS) to build resilience to facilitate climate change adaptation, whilst providing a feasible method to sequester and store carbon in line with net zero ambitions.'</p> <p>Table D-12 has been updated to include the following</p>

ID	Consultee	Comment	Response
			‘The NLP should set a target for the percentage of wild cover within green spaces to help prevent further biodiversity decline.’
21	Environment Agency	5 Baseline – Material Assets – Geology and soil – Discussion of geology should be expanded to include discussion of the protection of superficial deposits.	Appendix D of the IIA Interim Report have been updated to include the following Addition of an extra sentence which states ‘The Taplow and Kempton Park Gravels in the borough are classified as Secondary A aquifers and are therefore protected superficial deposits.’
22	Environment Agency	5 Baseline – Material Assets – Contaminated Land – Clarify that remediation should seek to protect and improve both groundwater and land quality.	Appendix D of the IIA Interim Report have been updated to include the following Added at end of existing sentence which states ‘...and remediation should seek to protect and improve both groundwater and land quality.’
23	Environment Agency	5 Baseline – Material Assets – Issues and Opportunities – Consider NPPF paragraphs 174 and 183 and promote relevant guidance from the Environment Agency with respect to groundwater and land quality issues. The requirements expected of developers under policies is also noted.	These paragraphs have been considered within the review of plans, policies and programmes. Groundwater issues have been considered within the ‘Water Environment’ topic in Appendix D.

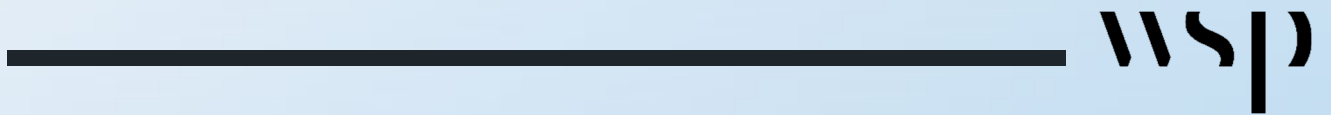
ID	Consultee	Comment	Response
24	Environment Agency	6 IIA Appraisal Framework – Biodiversity and Natural Capital – Note two points to be added to the ‘Key Sustainability Issues and Opportunities’.	<p>The IIA Appraisal Framework has been updated to include the following</p> <p>Addition of two extra bullet points which state</p> <p>‘Developments which encroach on the 10m buffer zone next to a watercourse will fragment habitat connectivity and reduce the ability for biodiversity to thrive.</p> <p>In-channel structures such as weirs and culverts inhibit fish passage and alter the natural state of the river corridor.’</p>
25	Environment Agency	6 IIA Appraisal Framework – Biodiversity and Natural Capital – Note one point to be added to the ‘IIA Supporting Appraisal Questions’ relating to watercourses and river corridors.	<p>The IIA Appraisal Framework has been updated have been updated to include the following</p> <p>‘Re-naturalise the river corridor and promote geomorphological processes which enhance and protect biodiversity?’</p>
26	Environment Agency	6 IIA Appraisal Framework – Water Environment – Sequential approach to decisions on policies and proposals in supporting appraisal questions should be suggested. Similarly to ID17, it is recommended that the issues and opportunities surrounding groundwater are considered. Specific reference to groundwater quality is also recommended.	<p>The IIA Appraisal Framework has been updated to include effects on groundwater.</p>

ID	Consultee	Comment	Response
27	Environment Agency	6 IIA Appraisal Framework – Water Environment – Note one point to be added to the ‘Key Sustainability Issues and Opportunities’ relating to the riparian buffer zone.	The IIA Appraisal Framework has been updated to include the following ‘Increased development which encroaches on a natural riparian buffer zone next to a watercourse, or one which is within a 10m distance from the watercourse, will have a negative effect on water quality and can increase flood risk.’
28	Environment Agency	6 IIA Appraisal Framework – Water Environment – Note one point to be added to the ‘IIA Supporting Appraisal Questions’ relating to natural forms of flood management.	The IIA Appraisal Framework has been updated to include the following ‘Support a natural form of flood management which also promotes biodiversity of the watercourse?’
29	Environment Agency	6 IIA Appraisal Framework – Material Assets – Expand the supporting appraisal questions to consider groundwater and land quality.	The IIA Appraisal Framework has been updated to include the following ‘Protect and enhance groundwater and land quality?’
30	Environment Agency	Appendix A – Table A-7 – Biodiversity and Natural Capital – Recommendation for additional specific information about the Water Framework Directive (WFD).	The WFD has been added to Table E-7 of the IIA Interim Report.

ID	Consultee	Comment	Response
31	Environment Agency	Appendix A – Table A-10 – Water Environment – The Metropolitan Flood Act 1879 should be included.	As this has been superseded this has not been included within Appendix E.
32	Environment Agency	Appendix A – Table A-13 – Material Assets – NPPF paragraph 183 should be included. Note that the Environment Agency will apply the position statements outlined in their Approach to Groundwater Protection.	<p>Table E-13 in the IIA Interim Report have been updated to include the following</p> <p>Paragraph 183 states: <i>“Planning policies and decisions should ensure that:</i></p> <ul style="list-style-type: none"> (a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation) (b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and (c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

Appendix D

Baseline



Introduction

This appendix sets out the baseline information and issues and opportunities. Both the baseline and issues and opportunities have been updated following consultation of the Scoping Report in July 2023.

Population and Equalities

Summary of Current Baseline

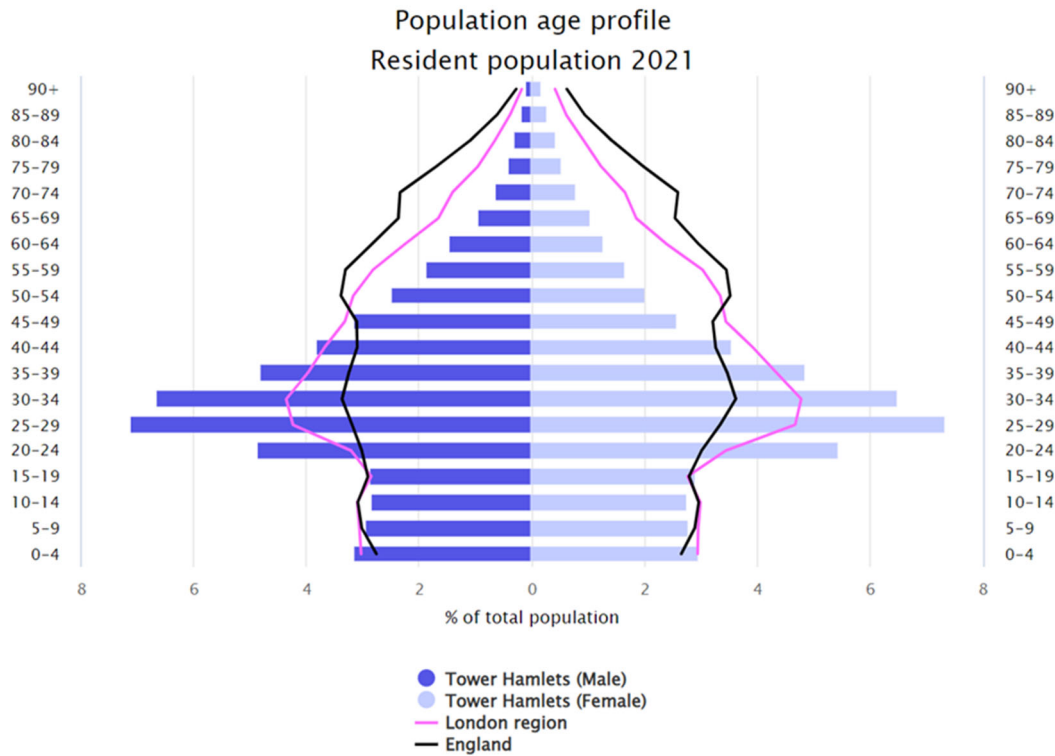
The borough has a total population of approximately 310,300 people³³. Out of the boroughs within London, LBTH has the highest population density of 15,695 people per square kilometre. This is significantly higher than the regional and national population density averages of 5,598 people per square kilometre, and 434 people per square kilometre, respectively.

The highest proportion of people in the borough are aged between 25-29 years, who make up 14.3% of the total population, as conceptualised in **Figure D-1** overleaf. The percentage of those aged 65 years and over (5.6%) is lower than the London average of 11.9% and the national average of 18.4%.

Within LBTH, approximately 49.8% of the population are females and 50.8% are males. This is comparable to both the London average (51.5% females, 48.5% males) and the national average (51.0% females, 49% males).

³³ Office for National Statistics Population and household estimates, England and Wales: Census 2021. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021>

Figure D-1 - Age Distribution Pyramid³⁴



According to the 2021 Census data³⁵, 51.7% of the population of LBTH are black, Asian and minority ethnic (BAME), 38.7% are White, 4.96% are ‘Mixed/Multiple’ ethnic group, 3.89% are ‘Other’ ethnic group, and 0.75% are Gypsy, Irish Traveller or Roma. Both the BAME and White ethnic group saw a decrease in population since the 2011 Census³⁶. Conversely, the ‘Other’ ethnic group increased between the Census’. The ‘Mixed/Multiple’ ethnic group and Gypsy, Irish Traveller or Roma comprised similar proportions of the borough population across this period.

Net internal migration accounts for approximately three quarters of the borough’s population growth, with LBTH having the second highest number of short-term migrants in London³⁷. More than four in ten residents (43%) were born outside of the UK, with residents born in

³⁴ Office for Health Improvement & Disparities, Local Authority Health Profiles. Available at:

<https://fingertips.phe.org.uk/profile/health-profiles/data#page/12/qid/1938132696/pat/6/ati/402/are/E09000030/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1>

³⁵ Office for National Statistics. Ethnic group, England and Wales: Census 2021. Available online at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/bulletins/ethnicgroupenglandandwales/census2021>

³⁶ Tower Hamlets Council (2013) Ethnicity in Tower Hamlets: Analysis of 2011 Census data. Available at: [RB-Census2011-Ethnicity-2013-01.pdf \(towerhamlets.gov.uk\)](#)

³⁷ Tower Hamlets Council (2017) A Profile of the Migrant Population in Tower Hamlets. Available at: [A Profile of the Migrant Population in Tower Hamlets.pdf \(towerhamlets.gov.uk\)](#)

Bangladesh making up the biggest migrant group³⁸. LBTH has a highly mobile population, with 23.5% moving to, from and within the borough each year³⁹.

The majority of residents in LBTH are Muslim (39.9%), followed by 'no religion' (26.6%), Christian (22.3%), Hindu (2%), Buddhist (0.95%), other religion (0.53%), Jewish (0.43%), and Sikh (0.31%)⁴⁰. However, 6.9% of people did not answer the 2021 Census question about religious belief. Since the 2011 Census, the proportion of Christian residents has fallen by -7.7% (from 30%), and people with 'no religion' has risen by +5.6% (from 21%)⁴¹. The other faith groups have remained largely unchanged between Census'.

Looking at the Indices of Multiple Deprivation in 2019 (IMD2019), LBTH has become considerably less deprived since IMD2015, ranking 175 in IMD2019 compared to 24 in IMD2015 out of 317 Local Authorities, indicating that the neighbourhoods within the authority have become less deprived relative to other neighbourhoods in England⁴².

Both the wards of St Peter's and Stepney Green have Lower Super Output Areas (LSOAs)⁴³ located within the top 10% of most deprived neighbourhood nationally, whilst there are 13 LSOAs located within the top 20% of most deprived neighbourhoods nationally. Island Gardens is the only ward which has a LSOA located within the top 10% of least deprived neighbourhoods nationally.

The borough has the highest income deprivation affecting older people in England, with 43.9% living in deprived households. The proportion of older persons living in income deprived families is also significantly higher than national averages⁴⁴. Older people in the borough are also much more sensitive to fuel poverty, in line with 1 in 10 older households in the UK are in fuel poverty⁴⁵, with this demographic much more likely to be vulnerable to the issue.

³⁸ Tower Hamlets Council (2020) Borough Profile 2020: Chapter 4: Poverty. Available at: [BoroughProfilePoverty.pptx \(live.com\)](#)

³⁹ Wood Group UK Limited (2021) London Borough of Tower Hamlets: Tall Buildings Supplementary Planning Document. Integrated Impact Assessment. Appendix

⁴⁰ Office for National Statistics, Religion, England and Wales: Census 2021. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/bulletins/religionenglandandwales/census2021>

⁴¹ Tower Hamlets Council (2015) Religion in Tower Hamlets: 2011 Census Update. Available at: [2015-04-21-Faith-key-facts-Revised-data.pdf \(towerhamlets.gov.uk\)](#)

⁴² Ministry of Housing, Communities and Local Government, Indices of Multiple Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

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⁴⁴ Wood Group UK Limited (2021) London Borough of Tower Hamlets: Tall Buildings Supplementary Planning Document. Integrated Impact Assessment – Main Report

⁴⁵ Age UK (2021) The Cost of Cold. Available at: [age-uk-the-cost-of-cold-nmp \(ageuk.org.uk\)](#)

Child poverty within the borough is also significant problem. LBTH has high rates of children living within both relative and absolute low income families⁴⁶, with 27.3% of children in relative low income families and 21.4% within absolute low income families³⁹. The borough has the highest rate of child poverty in the UK, with 31% of children living below the national poverty line⁴⁷.

Future Trends and evolution of the baseline without the NLP

The population of LBTH has grown by 22.1% since 2011⁴⁸, the largest percentage growth in population in England, and is predicted to see a population increase of 8.4% by mid-2028⁴⁹. The population isn't just growing it is also becoming younger and more diverse, with the current largest age demographic 25-29 years projected to increase by 11.3%, and almost half of the population by mid-2028 in the 20-39 years bracket. This equates to an increased working age population and a more economically active borough, likely stimulating a higher demand for career opportunities.

By 2033 it is expected that more people will be living on their own, constituting 41% of all households nationally⁵⁰. With this statistic in mind, LBTH, along with the rest of the country, is facing a housing crisis. The demand for specific housing which meets need will continue to rise over the coming years.

By 2031, ethnic minority populations are predicted to rise to 37% of the total population of London⁵¹. LBTH is already a diverse and culturally rich borough, and with this proportion expected to increase, the demand for the provision of cultural spaces and facilities will be prevalent.

The NLP will allow for better management of the types of housing being built in the borough to ensure there is suitable housing to meet the needs of residents both now and in future, reflecting the changing demographic. It would also allow for LBTH to better target community services and facilities to the areas where growth is most likely to occur and/or aid in better dispersing the projected growth in population across more of the borough. This

⁴⁶ Relative low income: This refers to people living in households with income below 60% of the median in that year. Absolute low income: This refers to people living in households with income below 60% of median income in a base year, usually 2010/11. This measurement is adjusted for inflation.

⁴⁷ Tower Hamlets Council (2015) Child poverty in Tower Hamlets – research briefing. Available at: [2015_Child_Poverty_Briefing.pdf \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk/2015-Child-Poverty-Briefing.pdf)

⁴⁸ Office for National Statistics (2022) How the population changed in Tower Hamlets: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E09000030/>

⁴⁹ Office for National Statistics, Subnational population projections for England: 2018-based. Available at: <https://www.ons.gov.uk/releases/subnationalpopulationprojectionsforengland2018based>

⁵⁰ The Kings Fund. 2012. Demography: Future Trends. Available at: <https://www.kingsfund.org.uk/projects/time-think-differently/trends-demography>

⁵¹ Wohland, P. et al. (2010). Research paper. 'Ethnic population projections for the UK and local areas, 2001-2015'. University of Leeds.

will also help to support community cohesion which will likely become more pertinent as the population becomes more ethnically diverse.

Issues and Opportunities

Issues and opportunities for population and equalities and the implications for the Local Plan have been identified in **Table D-1**.

Table D-1 – Issues and Opportunities for Population and Equalities

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income; ■ There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities; ■ The population of the borough is expected to increase both in number and diversity, and decrease in age profile; and ■ Changing work habits such as remote, internet-based jobs are likely to reduce current demands but may also increase social isolation and reliance on alternative social interaction. 	<ul style="list-style-type: none"> ■ The NLP will need to address any necessary housing and service development to ensure provisions to young adults and socially excluded population groups; ■ Development will need to support future demographic change, tackle overcrowding and increase affordable housing stock; and ■ The NLP will need to ensure there are adequate provisions of services and facilities within the borough, particularly for young adults, socially excluded groups and people with disabilities.

Human Health

Summary of Current Baseline

The average life expectancy at birth in LBTH is similar but slightly higher than the national average at 79.9 years for male and 83.3 years for females⁵². This is slightly lower than the average for the London region at 80.3 years and 84.3 years respectively. Health inequalities are prevalent, with life expectancy lower in the most deprived areas than the least deprived areas for both men and women, at 11.4 years and 4.8 years respectively. This indicates human health disparity between gender and socio-economic groups.

In LBTH, 67.2% of adults (aged 19+) are physically active⁵³. This is higher than both the regional and national averages at 66.4% and 66.3% respectively. The proportion of adults (aged 18+) classified as overweight or obese in LBTH is 49.1% and is significantly better than the national average. This is lower than the regional average of 55.9% and significantly lower than the national average of 62%. In year six children (aged 10-11 years) the prevalence of obesity (including severe obesity) is 25.3%, significantly worse than the national average of 20.2%. The percentage of children in low-income families is also significantly worse than the England average, at 30.3%. The regional and national averages are 18.8% and 17.0% respectively.

The IMD2019 health domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. LBTH is ranked 95th out of 317 local authorities²¹. Of the 144 Lower Super Output Areas (LSOAs) in the borough, one is located within the top 10% of most deprived neighbourhoods nationally in terms of health deprivation, whilst 25 are located in the top 20%²¹.

Poor air quality is a significant public health issue⁵⁴ and there is clear evidence that particulate matter has a significant contributory role in mortality. Each year in the UK between 28,000 and 36,000 deaths a year are attributed to long-term exposure to poor air quality⁵⁵. Air pollution can also be linked to cardiovascular disease, diabetes, and dementia. Sufferers of chronic respiratory diseases such as Chronic Obstructive Pulmonary Disease (COPD) and asthma are especially vulnerable to the effects of air pollutants. Air

⁵² Tower Hamlets Local Authority Health Profile 2020. [online] Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/102/are/E09000030>

⁵³ Office for Health Improvement and Disparities. Local Authority Health Profiles (2019). Available online at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/13/gid/1938133216/pat/6/par/E12000007/ati/102/are/E09000030/yr/3/cid/4/tbm/1>

⁵⁴ Department for Environment Food and Rural Affairs, Air Quality: Public Health Impacts and Local Actions. Available online at: [https://aqm.defra.gov.uk/documents/air_quality_note_v7a-\(3\).pdf](https://aqm.defra.gov.uk/documents/air_quality_note_v7a-(3).pdf)

⁵⁵ Gov.uk, Public Health England publishes air pollution evidence review, 2019 [online] available at: <https://www.gov.uk/government/news/public-health-england-publishes-air-pollution-evidence-review>

pollution has also been shown to have an increased health impact on those in lower socio-economic groups.

The entirety of LBTH is situated within an Air Quality Management Area (AQMA) declared in 2000 for Particulate Matter (PM10) and Nitrogen dioxide (NO₂)⁵⁶. The AQMA identifies areas of higher air pollution that may affect health, from transport and industrial sources.

The borough has a higher rate of emergency hospital admissions for COPD when compared to the national average, with the majority of wards above the national average. LBTH as a borough admits 166.0 people per 100,000 people for COPD, higher compared to the national average (100.0 people per 100,000 people)⁵⁷. St Peter's area has the highest admission rate of any ward within the borough, at 311.3 people per 100,000 people. Conversely, St Katherine's and Wapping performs better than the national average with 43.3 people per 100,000 people admitted.

The mortality rate (under 75 years) from all causes in LBTH is 361.1 people per 100,000 people⁵². This is significantly higher than the regional average of 303.3 people per 100,000 people and the national average of 330.5 people per 100,000 people.

The prevalence of smoking in LBTH among adults (aged 18+) is 20.3%⁵². This is higher than the regional average (13.9%) and the national average (14.4%).

Social isolation can lead to loneliness which has the potential to undermine well-being thereby impacting negatively on people's quality of life. Loneliness can have a huge impact on the wellbeing of many people particularly older people, those with disabilities and new and expectant mothers. It can often result in unhappiness, lowering of self-confidence and ability to reach out for help.

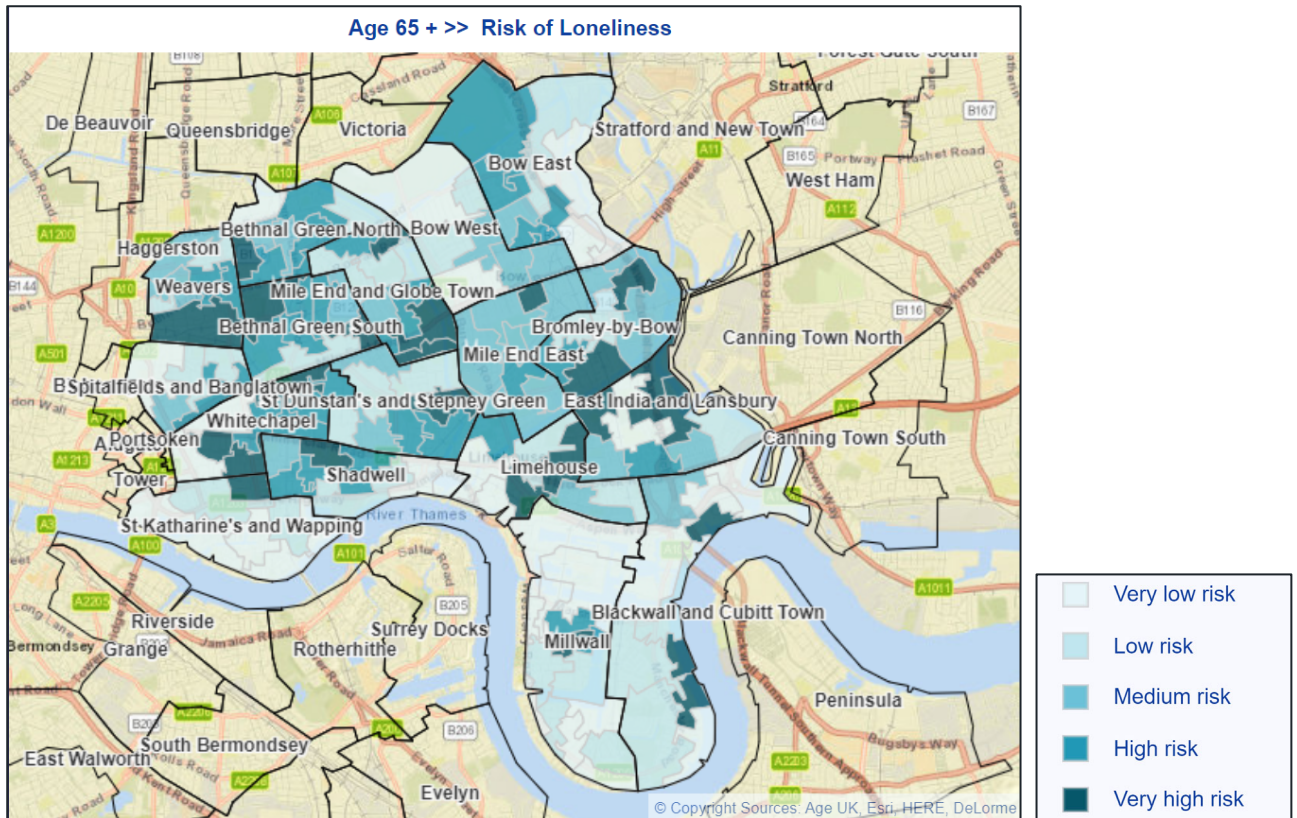
According to Age UK, the majority of the people aged 65 and over in the south of LBTH are within very low and low risk areas for loneliness with areas in the UK ranked from 1 high risk to 32,844 very low risk⁵⁸. However, the centre and north of LBTH are within medium, high risk, and very high risk of loneliness. The heat map in **Figure D-2** overleaf visualises this trend.

⁵⁶ Department for Environment Food and Rural Affairs, UK AIR, Tower Hamlets AQMA. Available online at: https://uk-air.defra.gov.uk/aqma/details?aqma_ref=141#132

⁵⁷ Public Health England, 2021. Local Health [online] Available at: https://www.localhealth.org.uk/#bbox=377927,397127,28450,17731&c=indicator&i=t3.em_adm_copd&selcodgeo=E08000007&view=map10

⁵⁸ Age UK (2016). Risk of Loneliness. Available online at: <https://www.ageuk.org.uk/our-impact/policy-research/loneliness-research-and-resources/loneliness-maps/>

Figure D-2 – Heat Map of Relative Risk of Loneliness⁵⁸



The spread of COVID-19 in the UK has resulted in significant pressure upon NHS resources, particularly hospitals, and has resulted in additional wait times for routine healthcare appointments across services. Since the start of the Covid-19 pandemic, 114,550 positive cases and 646 deaths (194.6 people per 100,000 people) have been recorded within the borough, lower than the regional (283 people per 100,000) and national (326.4 people per 100,000) figures⁵⁹.

In total, 604,248 vaccinations have been given – 238,909 people have received one dose (66.1% of 12+ year olds), 218,819 people have received two doses (60.5% of 12+ year olds) and 146,520 (40.5% of 12+ year olds) have received either a booster or a third dose⁴⁶. The uptake of vaccinations is lower than the national average (78.1% one dose, 74.5% two doses and 59.2% booster or a third dose) and regional averages (68.1% one dose, 64% two doses and 46.8% booster or a third dose)⁵⁹.

Fuel poverty is determined if a household has required fuel costs that are above average (the national median level) and were they to spend that amount, they would be left with a

⁵⁹ UK Government (2022). Coronavirus (COVID-19) in the UK – Cases in Tower Hamlets. [online] Available at: <https://coronavirus.data.gov.uk/details/cases?areaType=Itla&areaName=Stockport>

residual income below the official poverty line⁶⁰. 14.2% of households in LBTH are estimated to be in fuel poverty, compared to the national average of 13.4%⁶¹.

Future Trends And Evolution Of The Baseline Without The NLP

The increasing population of LBTH and the observed active nature of its adults will likely result in increased demand for exercise facilities and open access outdoor space.

Social isolation and loneliness are also likely to become more prevalent in LBTH as more people work from home, particularly due to and following the COVID-19 pandemic. This has the potential to undermine well-being, thereby impacting negatively on people's quality of life. Social isolation and loneliness are also associated with increasing the likelihood of sensory and mobility impairments and deteriorating health.

Covid-19 has also exacerbated existing inequalities in LBTH. Without preparedness and effective response to resurgence of Covid-19, including increased vaccine rollout, issues such as social isolation and loneliness could be exacerbated. The rising cost of living, or 'Cost-of-Living Crisis', is also predicted to impact those with pre-existing mental health problems, as they are among those at greatest risk⁶². It is well documented that recessions increase social inequalities, which are drivers of poor mental health⁶³.

The prevalence of obesity in Year 6 children is also a concern that must be addressed, without healthy child weight strategies these particularly bad health incomes for children will persist.

The anticipated population growth and the increasing affordability and convenience of car travel is likely to result in an increase in the number of private vehicles on the roads. This could have cumulative effects on air quality, noise pollution and public health if current trends continue.

Air pollution has been linked to diabetes and dementia – both chronic illnesses in the UK are expected to rise in future. Increased mortality and morbidity amongst diabetics are associated with increased NO₂ concentrations with long term exposure to traffic borne air

⁶⁰ Department for Business, Energy & Industrial Strategy. Fuel Poverty Statistics. Available at: <https://www.gov.uk/government/collections/fuel-poverty-statistics>

⁶¹ Department for Business, Energy & Industrial Strategy. Sub-regional fuel poverty data 2021. Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2021>

⁶² Mental Health Foundation (2023) Mental Health and the Cost-of-Living Crisis: Another pandemic in the making? Available at: <https://www.mentalhealth.org.uk/our-work/policy-and-advocacy/mental-health-and-cost-of-living-crisis-report>

⁶³ Wahlbeck, K. & McDavid, D. (2012), 'Actions to alleviate the mental health impact of the economic crisis', World Psychiatry Available at: <https://doi.org/10.1002/j.2051-5545.2012.tb00114.x>

pollution positively correlating with incidence of type two diabetes and increased mortality among diabetics⁶⁴.

In 2022, the government published the Levelling Up white paper⁶⁵, setting out a broad approach to rebalancing the UK economy and addressing significant regional inequalities that restrict people, places, and prosperity. If the Levelling Up and Regeneration Bill come into force, there is potential to reduce inequalities within the borough, improving health outcomes.

Due to the population density within the borough and high number of high-rise buildings, the urban heat island effect is a prevalent issue in the borough. The urban heat island effect reduces the ability for cities to cool subsequently having adverse effects on health the health of the local populations, particularly for more those vulnerable groups such as older people, young children and those with pre-existing health conditions such as asthma and/or cardiovascular disease.

In addition to the urban heat island effect, climate change is projected to increase the probability of overheating in London⁶⁶. As the population increases and the effects of climate change become more prevalent, there is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation.

Without a NLP it is likely that health issues within the borough will continue to persist. The plan would allow for LBTH to better target community services, greenspaces and sports/recreational facilities to the areas where growth is most likely to occur and/or aid in better dispersing the projected growth in population across more of the borough. This will also help to support community cohesion and reduce isolation.

⁶⁴ Committee on the Medical Effects of Air Pollutants (COMEAP), The Mortality Effects of Long-Term Exposure to Particulate Air Pollution in the United Kingdom, 2010, [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/304641/COMEAP_mortality_effects_of_long_term_exposure.pdf

⁶⁵ Department for Levelling Up, Housing and Communities, Levelling Up and Regeneration [online] available at: <https://www.gov.uk/government/publications/levelling-up-and-regeneration-further-information/levelling-up-and-regeneration-further-information>

⁶⁶ Kolokotroni, M et al, London's urban heat island: Impact on current and future energy consumption in office buildings, Energy and Buildings Volume 47, 2012 [online] available at: <https://www.sciencedirect.com/science/article/pii/S0378778811006293?via%3Dihub>

Issues and Opportunities

Issues and opportunities for human health and the implications for the NLP have been identified in **Table D-2**.

Table D-2 – Issues and Opportunities for Human Health

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ LBTH’s reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness, smoking, and STI treatment; ■ There are significant health inequalities amongst residents in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents; ■ Covid-19 has also exacerbated existing inequalities in the borough; ■ There are high levels of obesity within children aged 10-11 years; and ■ The urban heat island effect is having adverse effects on the health of the local population, particularly those more vulnerable groups. 	<ul style="list-style-type: none"> ■ The NLP should maximise opportunities to enhance walking and cycling routes and encourage the use of non-motorised forms of transport. This will help to improve levels of physical activity within the borough; ■ There will be a need to improve public transport users’ confidence in returning to public transport post-Covid19; ■ The NLP should ensure developments contribute positively to accessible neighbourhoods, reducing health inequalities in accessibility; ■ There will be an ongoing need to provide services and affordable housing facilities in order to meet the needs of younger residents; ■ There is a need for the NLP address issues with inequalities and ‘level up’ the borough following the Covid-19 pandemic; ■ There is a requirement for implementation of healthy child weight initiatives; ■ The NLP should provide early support for individuals at risk of loneliness and subsequent poor mental health, treating them with the same level of care as physical conditions; ■ There is a need to provide more greenspaces and high quality public

Key Risks/Opportunities	Implications for the NLP
	<p>realm which can provide social spaces; and</p> <ul style="list-style-type: none"> There is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation.

Economy and Employment

Summary of Current Baseline

In 2021, 76.9% of the population within the LBTH were of working age (between 16-64 years) which is slightly higher than both the regional and national averages of 70.0% and 64.2% respectively³³. Employment rates for people of working age (between 16-64 years) is in line with but slightly lower than the regional average (75.8%) and national average (75.7%) at 72.8%. Between 2011 and 2021, there has been a 2.0% increase in the number of economically active people in the borough⁶⁷.

LBTH has a diverse employment market, with large clusters of offices in Canary Wharf and the City Fringe, and industrial areas that provide logistics support for the whole of Central London. In 2017, LBTH economic output was £29.7bn, with the economy growing by 49% across the decade prior⁶⁸.

This brings a significant amount of employment opportunities, with job density in LBTH recorded as 1.31 which is higher than the regional job density of 1.02 and significantly higher than the national job density of 0.85⁶⁹.

Despite this, LBTH has a relatively high economic inactivity rate. From 2021 to 2022, 24.5% of the borough’s working age population were economically inactive, compared to 20.6% in London and 21.6% in Great Britain⁶⁹. There is also gender disparity in the economically active population, with 25.4% more males than females economically active.

⁶⁷ Office for National Statistics. Employment in local authorities, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/employmentinlocalauthoritiesenglandandwales/census2021>

⁶⁸ Tower Hamlets Council (2020) Borough Profile 2020: Economy. Available at: https://www.towerhamlets.gov.uk/lgnl/community_and_living/borough_statistics/Borough_profile.aspx

⁶⁹ Nomis (2021) Labour Market Profile. Available online at: <https://www.nomisweb.co.uk/reports/lmp/la/contents.aspx>

As of 2021, there are 311,000 jobs in LBTH⁶⁹, however the vast majority are filled by non-residents and employees commuting from outside the borough⁷⁰, with approximately 15% taken by local residents⁷¹. The borough's daytime population increases by about 60% as a result of the large working weekday population⁷². However, since the Covid-19 pandemic, 50.3% of people aged 16+ in employment in the borough work mainly at or from home⁷³.

LBTH performs better than the medium for gross median weekly pay (£718.70) compared to the regional average (£645.80) and national average (£536.60)⁷⁴. Gross disposable household income (GDPI) per head is however considerably lower than the regional average (£29,890) at £26,175, but significantly higher than the national average £21,962.

LBTH has a high level of productivity, with £112,559 gross value added (GVA) per head in 2020 which is higher than the London average of £52,239 GVA per head⁷⁵. However, although this has increased by 9.8% since 2015, it has decreased by 10.8% since 2017. Despite this, GVA in LBTH is significantly higher than the 2020 national average of £29,757 per head.

Table D-3 shows the borough's key economic sectors compared to regional and national averages. Financial and insurance activities are the largest economic sector in the LBTH, with a higher employment rate than the regional and national averages. This is followed by professional, scientific and technical activities, information and communication, administrative and support services activities, human health and social work activities, education and wholesale and retail trade.

⁷⁰ Tower Hamlets Council (2019) London Borough of Tower Hamlets: Third Local Implementation Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=143901>

⁷¹ Canary Wharf Group & Elba (2022) PEG: Economy, Cost of Living and Levelling Up. Available at: <https://www.towerhamlets.gov.uk/thp/ITEM-3-Economy-cost-of-living-and-levelling-up.pdf>

⁷² Office for National Statistics (2022) Travel to work, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkenglandandwales/census2021>

⁷³ Tower Hamlets Council (2011) Tower Hamlets Employment Strategy. Available at <https://democracy.towerhamlets.gov.uk/documents/s21806/>

⁷⁴ Office for National Statistics (2023) Subnational indicators dataset. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/datasets/subnationalindicatorsdataset>

⁷⁵ Office for National Statistics (2022) Regional gross value added (balanced) per head and income components. Available at: <https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/nominalregionalgrossvalueaddedbalancedperheadandincomecomponents>

Table D-3 – Employment by Economic Sector (%)⁶⁹

Industry	Tower Hamlets (%)	London (%)	Great Britain (%)
B : Mining And Quarrying	0.0	0.0	0.1
C : Manufacturing	0.9	2.1	7.6
D : Electricity, Gas, Steam And Air Conditioning Supply	0.2	0.4	0.4
E : Water Supply; Sewerage, Waste Management And Remediation Activities	0.1	0.3	0.7
F : Construction	1.7	3.5	4.9
G : Wholesale And Retail Trade; Repair Of Motor Vehicles And Motorcycles	6.2	11.5	14.4
H : Transportation And Storage	2.1	4.3	5.1
I : Accommodation And Food Service Activities	5.2	7.4	7.5
J : Information And Communication	10.0	8.4	4.5
K : Financial And Insurance Activities	23.7	8.0	3.6
L : Real Estate Activities	2.1	2.5	1.8
M : Professional, Scientific And Technical Activities	16.8	14.2	8.9
N : Administrative And Support Service Activities	9.6	9.7	8.9

Industry	Tower Hamlets (%)	London (%)	Great Britain (%)
O : Public Administration And Defence; Compulsory Social Security	4.1	4.6	4.6
P : Education	6.2	7.3	8.8
Q : Human Health And Social Work Activities	7.6	10.6	13.7
R : Arts, Entertainment And Recreation	1.5	2.8	2.3
S : Other Service Activities	1.5	2.5	1.9

The financial and insurance industry is the largest in LBTH based on the number of jobs, accounting for 23.7% of roles in the borough. The high level of employment in professional, scientific and technical industries is not surprising given that the borough’s population are highly skilled.

Of the population in LBTH, 52.1% have obtained level 4 qualifications or above which is higher than the national average by 8.4%⁶⁹. However, the percentage of the population with no qualifications is in line with the national average (6.6%) at 6.5%, and higher than the regional average of 5.5%.

The Covid-19 crisis impacted nearly all residents and local businesses in the borough. LBTH has implemented the Mayor’s Covid Recovery Fund initiative, a multi-million-pound scheme to kickstart the economic, health and social recovery from Covid-19⁷⁶. It consists of grants to support the recovery of residents, businesses, and community organisations from the impact of the pandemic, supporting 25 vital projects in the borough. The pandemic has also changed the way people are working with many employers now allowing employees to work from home, increasing flexibility and resilience in the workforce.

⁷⁶ Tower Hamlets Council (2021) £3million boost to kickstart the borough's path out of the pandemic. Available at: https://www.towerhamlets.gov.uk/News_events/2021/July-2021/3million-boost-to-kickstart-the-boroughs-path-out-of-the-pandemic.aspx

In March 2020, in line with the Equalities Act 2010, the gender pay gap figures for women in LBTH were that they were earning 92.83% of the average (mean) pay of men⁷⁵. However, there is no one reason behind the gender pay gap, with caring responsibilities, a divided labour market, discrimination, and men tending to work in senior roles all contributing factors.

Future Trends and evolution of the baseline without the NLP

The rising population in the region is accelerating the need for the delivery of additional housing, services, and infrastructure. Growth in jobs is also anticipated in order to close the gap between increases in population and the need for employment. There is a need for improving accessibility to these jobs and training opportunities, particularly given that the levels of non-resident workers commuting into LBTH is significant.

The population is becoming younger, and the working age is increasing. However, the working age population has a relatively high economic inactivity rate. The increase in the percentage of the population that is of working age is expected to increase local economic activity levels and the supply of labour.

A NLP would allow for the delivery of new employment opportunities within the borough that are more targeted to the specific residents' needs and will help to tackle economic inactivity. The construction of new development will provide opportunities for employment within the borough. In addition to this, new developments will help to maximise social value outcomes for the local community by considering benefits to existing residents, businesses and other stakeholders as well as those expected to use the new development.

During and since the Covid-19 pandemic, homeworking has been encouraged for those who are able, changing the way people work. This trend will likely continue as employers look to maintain flexible working conditions in future. However, with the Cost-of-Living Crisis and rising energy bills, this is difficult for some households to maintain, not helped by 29,000 employees earning less than the London Living Wage (LLW)⁷¹.

Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping. This issue may not be addressed without the presence of the local plan and specific developments and policies targeting town centres and high streets.

Issues and Opportunities

Issues and opportunities for economy and employment and the implications for the NLP have been identified in **Table D-4**.

Table D-4 – Issues and Opportunities for Economy and Employment

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ LBTH is a major location for employment in London, attracting a large daytime population of workers; ■ Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount are employed. Employed residents in LBTH have a higher gross value added (GVA) per head and gross weekly pay; ■ However, there is a higher economic activity rate, with more males economically active than females; ■ This also highlights that there may be a need to diversify employment within the borough, particularly to match the skills of existing residents; ■ It is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough; and ■ Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping. 	<ul style="list-style-type: none"> ■ The NLP should endeavour to improve connectivity between business clusters and housing markets (both planned and existing) in the borough, which will help to improve access to the skills pool as well supporting improvements in productivity; ■ The NLP should support the development of new employment sites and maintain vitality in key centres; ■ The NLP should seek to boost jobs and business, by supporting small businesses, start-ups, and markets, and creating jobs and training opportunities; ■ The NLP should encourage new developments to maximise social value benefits; and ■ The NLP should maintain the vitality and attractiveness of town centres by supporting their recovery from Covid-19 through the provision and protection of retail, shops, and businesses, with the provision of affordable retail and commercial space encouraged.

Housing

Summary of Current Baseline

LBTH position within London and its good transport links make it attractive to commuters and non-resident workers. However, this puts pressure on house prices. People from outside the area buying houses closer to work to shorten commuting time, limits the availability of housing that is affordable for younger buyers 'First Homes' and/or those on lower incomes.

House prices in LBTH have increased by 9.6% between January 2022 and January 2023, from £445,861 to £488,833⁷⁷. This is substantially higher than the England average of £310,159 (January 2023). However, house prices in LBTH are lower than the London average of £533,986. Annual price changes of a property in LBTH (9.6%) are significantly higher than both London (3.2%) and England (6.9%). The average house price in LBTH has increased by £118,333 since April 2013⁷⁸.

Figure D-3 compares the average house prices (as of January 2023) of the surrounding local authorities⁷⁹. This shows that of the 32 London boroughs, and the City of London, that make up London, Barking and Dagenham has the lowest average house prices. Kensington and Chelsea have significantly higher average house prices compared to the other local authorities in London. LBTH is the 21st least affordable borough in London. The sales volume for LBTH has decreased from November 2021 (245 sales) to November 2022 (185 sales), as it has for London over the same period (8,130 sales to 6,129 sales).

⁷⁷ HM Land Registry (2023) UK House Price Index England: January 2023. Available at: <https://www.gov.uk/government/statistics/uk-house-price-index-for-january-2023/uk-house-price-index-england-january-2023>

⁷⁸ Tower Hamlets Council (2013) House prices: Private rental market and House price trends in Tower Hamlets. Available at: https://www.towerhamlets.gov.uk/ignl/community_and_living/borough_statistics/housing.aspx

⁷⁹ Land Registry Data (2023) UK House Price Index. Available at: <https://landregistry.data.gov.uk/app/ukhpi>

Figure D-3 – Average House Prices by Local Authority Area⁷⁹

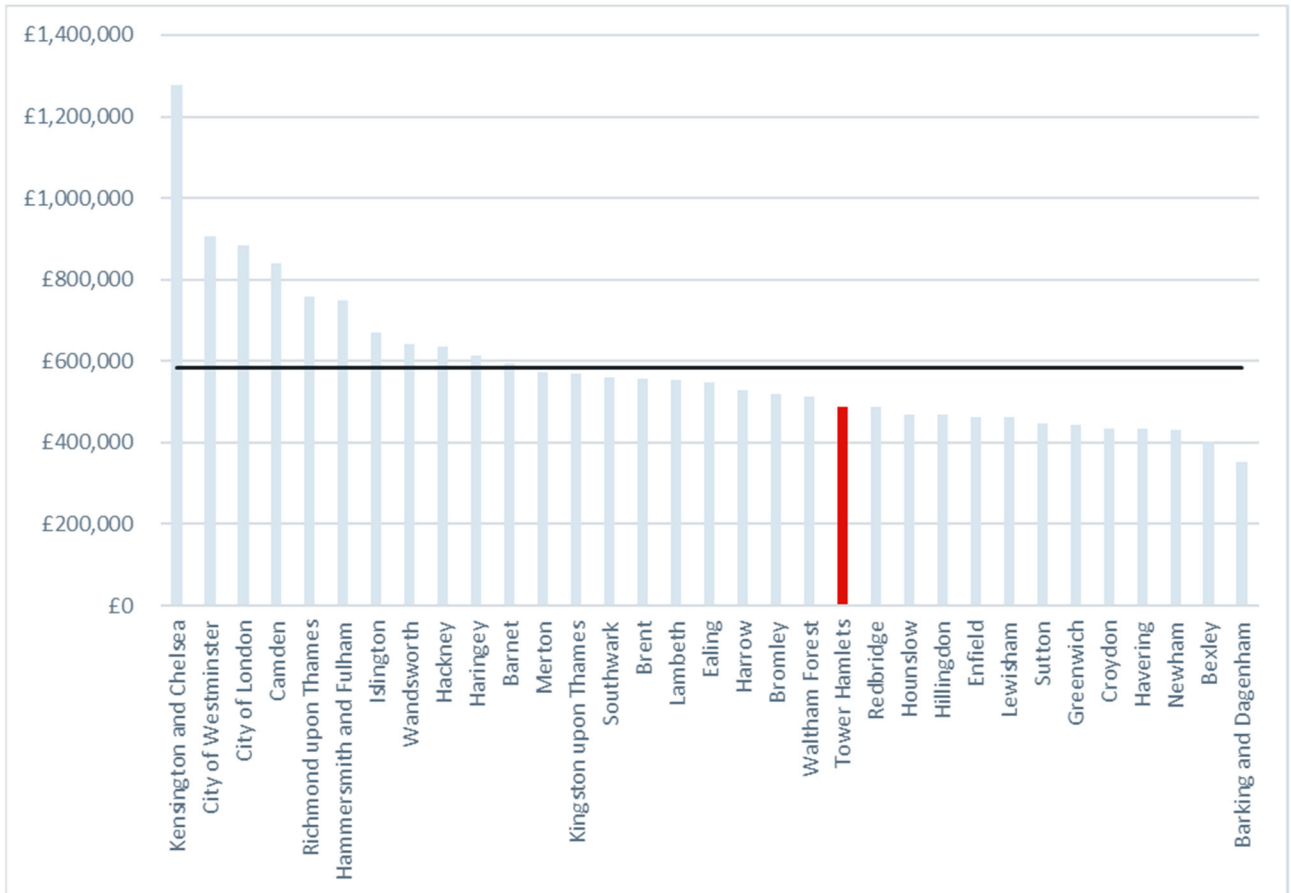
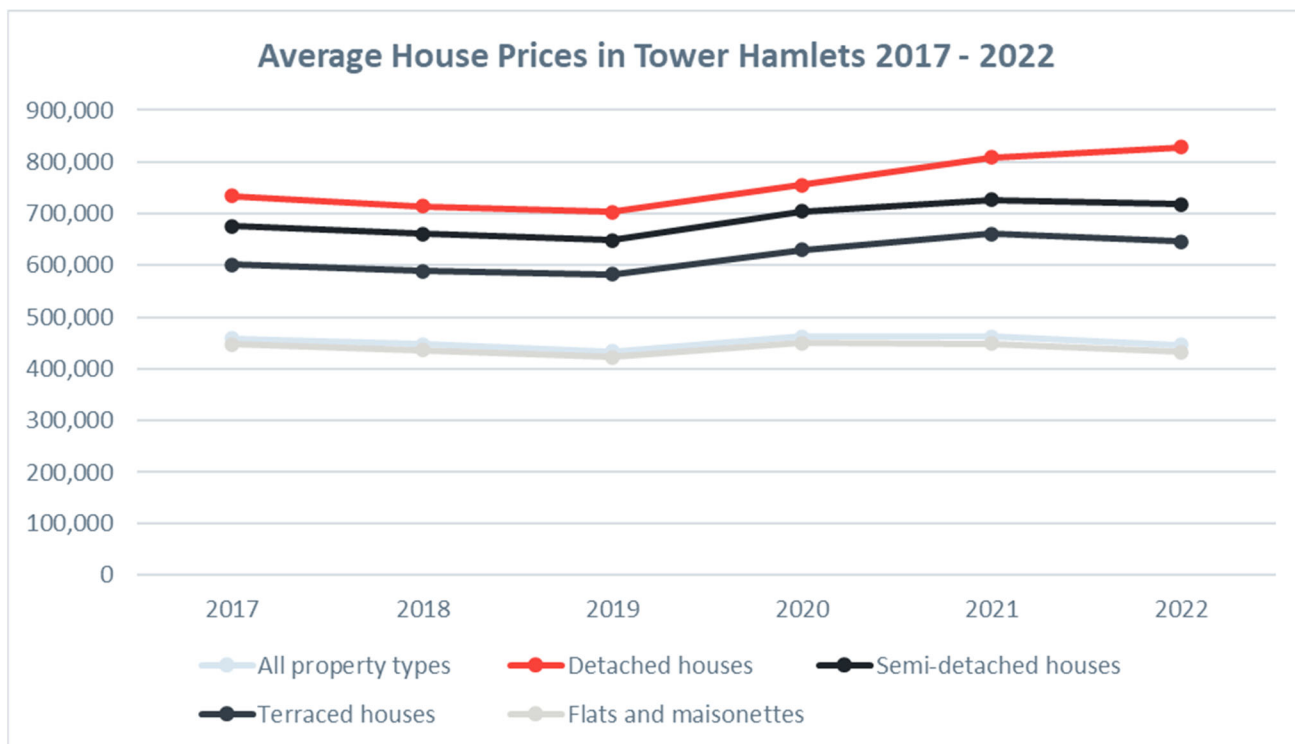


Figure D-4 overleaf shows the changes in property prices in LBTH across the different housing types since 2017. Overall, prices have increased for detached houses, semi-detached houses, and terrace houses, with detached housing seeing the largest increase, especially during and after the Covid-19 pandemic hit in 2020, where homes with more space and a garden become more of a priority. All property types and flats and maisonettes have plateaued.

Figure D-4 – Average House Prices in Tower Hamlets (2017-2022)⁷⁹



**Average house prices based on January values*

The average mean salary in 2022 in LBTH was £46,716⁸⁰. According To Tower Hamlet’s draft Local Housing Needs Assessment (LHNA)⁸¹, in order to be able to buy a property in the borough (assuming a 10% deposit), the estimated annual household income required is £75,000. This increases to £82,000 within the City Fringe area and £98,000 in the Isle of Dogs and South Poplar area.

In terms of renting privately, the estimated annual household income required to rent in the borough is £56,600. Again, this increases to £60,000 in the City Fringe area and £64,000 in Isle of Dogs and South Poplar area.

The LHNA has identified that 29,000 households in need of housing. The greatest proportion of those in need of housing (66.1%) is due to overcrowding. Over three-quarters of those households in need are unlikely to be able to afford market housing to buy or rent and therefore there is a current need from 22,515 households. As of November 2022, there were over 12,000 claimants of housing benefit, which has increased since Covid-19⁶⁷.

⁸⁰ Annual Survey of Hours and Earnings (ASHE) 2023 [online] available at: <https://www.ons.gov.uk/surveys/informationforbusinesses/businesssurveys/annualsurveyofhoursandearningsashe>

⁸¹ Icenl on behalf of Tower Hamlets, Draft Local Housing Needs Assessment, 2023

The primary underlying reason for homelessness within LBTH is the lack of affordable accommodation. LBTH has a statutory responsibility under the Homelessness Reduction Act 2017⁸² to provide advice and information about homelessness and the prevention of homelessness within the borough. Out of 610 total initial assessments, 265 households in LBTH were threatened with homelessness between July-September 2022⁸³. As of 2017/18, 375 people were rough sleeping in LBTH as identified in the Homelessness and Rough Sleeping Strategy 2018-2023⁸⁴.

LBTH is seeking to provide more affordable housing and their Housing Strategy 2016-21 (Section 4 – Delivery Theme 1) states that the council has a strategic target of affordable housing of 50% from all new housing developments⁸⁵. The Strategic Plan 2022-26 develops upon this, indicating that LBTH will work with developers and housing associations to deliver a minimum of 1000 social homes for rent each year.

Future Trends And Evolution Of The Baseline Without The NLP

The London Plan 2021 **Error! Bookmark not defined.** has identified a 10-year housing supply target of 34,730 new homes for LBTH (2019/20 -2028/29). In 2018, LBTH identified a need for over 54,000 new homes expected to be built in the borough by 2030/31³⁸, with the majority of projected units in the Canary Wharf ward.

LBTH's population becoming younger and more diverse is happening at a higher rate than regional and national averages. Projections show that almost half of the population will be aged 20-39 by mid-2028. Therefore, the demand on affordable housing will increase.

There is also an increased risk of homelessness due to the effects of the decline in incomes that have resulted from the pandemic and the increased cost of living. There were 2,690 people estimated to be sleeping rough on a single night in autumn in 2020 (during the pandemic)⁸⁶. This declined by 9% in 2021, however, the levels of homelessness in England are still 38% higher than 2010 levels. Providing affordable housing is critical to tackling homelessness, among other issues such as overcrowding.

The current cost of living crisis in the UK is set to continue, which is likely to reduce residents' disposable income, particularly if inflation continues to outstrip increases in

⁸² Legislation.gov.uk (2017) Homelessness Reduction Act 2017. Available at: <https://www.legislation.gov.uk/ukpga/2017/13/contents/enacted>

⁸³ Gov.uk (2023) Tables on homelessness. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

⁸⁴ Tower Hamlets Council (2018) Homelessness and Rough Sleeping Strategy 2018-2023 https://www.towerhamlets.gov.uk/Documents/Homelessness_and_Rough_Sleeping_Strategy_2018_2023.pdf

⁸⁵ Tower Hamlets Council (2016) London Borough of Tower Hamlets 2016-21 Housing Strategy https://www.towerhamlets.gov.uk/Documents/Housing/THHF/TH_Housing_Strategy_document_v5.pdf

⁸⁶ Department for Levelling UP, Housing & Communities (2022) Official Statistics – Rough sleeping snapshot in England: autumn 2021. Available at: <https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2021/rough-sleeping-snapshot-in-england-autumn-2021>

nominal wages. The Bank of England has forecasted that real household disposable income fell by 2.5% in 2022 and is anticipated to fall by a further 2.6% in 2023⁸⁷. Wage growth in the last year has not been sufficient to keep pace with inflation, with underlying pay growth of only 4% in February 2022.

Rising costs of living is likely to widen levels of inequality in the borough. However, with the Levelling Up and Regeneration Bill that have come into force, there is potential to reduce inequalities within the borough, although, this will be highly dependent upon the schemes and initiatives that come forward.

The absence of the NLP would not halt the delivery of housing in borough as applications for planning permission would be determined in accordance with both the NPPF and the London Plan. However, without specific local policies guiding the quantum, type and location of new development, the extent to which new development meets the needs of the Borough would be more uncertain. This could give rise to inappropriately located developments and missed opportunities to tackle deprivation, affordability and provide community services and facilities.

Issues and Opportunities

Issues and opportunities for housing and the implications for the NLP have been identified in **Table D-5**.

Table D-5 – Issues and Opportunities for Housing

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There is significant need for affordable properties to buy and rent, however rising costs of living and above average house prices are affecting the number of residents able to afford to buy; ■ There are significant levels of overcrowding in the borough with 66% of those in need of housing currently living in overcrowded conditions; ■ The Covid-19 pandemic and rising cost of living are increasing levels of homelessness; and 	<ul style="list-style-type: none"> ■ The NLP will need to ensure housing requirements are being worked towards, especially by expanding increasing the availability of affordable housing. ■ The NLP will need to consider differing population needs, including the demands of a young and diverse population.

⁸⁷ Institute for Government, Cost of Living Crisis, [online] available at: <https://www.instituteforgovernment.org.uk/explainers/cost-living-crisis>

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ▪ The lack of affordable housing, means that young people and/or lower income groups are missing out. 	

Crime and Safety

Summary of Current Baseline

Ensuring community safety is key for achieving a positive state of well-being among people within social and physical environments. It is as much about reducing and preventing crime as it is about building strong and vibrant communities. This means the perception of safety within the borough’s communities is as important as measuring crime rates.

The number of casualties in LBTH killed and seriously injured (KSI) on roads for 2021 was 302.1 people (per 100,000 resident population)⁵⁷. This is higher and worse than both the regional (194.0 people per 100,000) and the national (95.6 people per 100,000) averages.

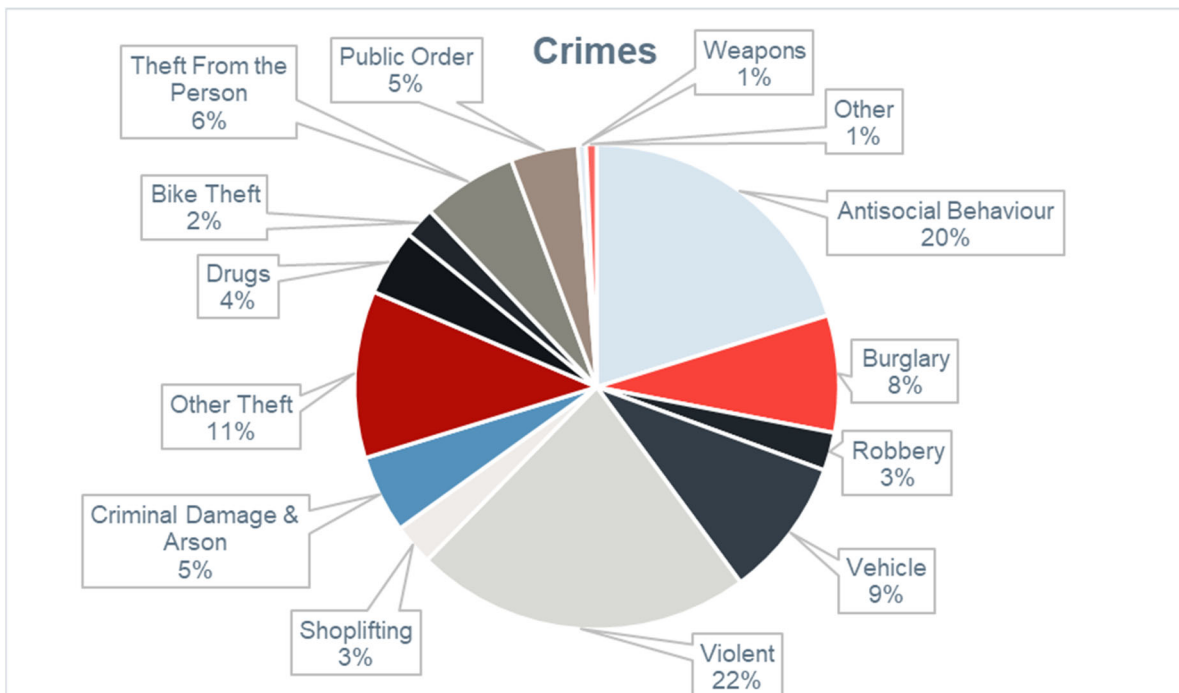
Crime rates in LBTH are high, with over 127.5 crimes per 1,000 people in the last year (February 2022-February 2023)⁸⁸, making the borough among the top 10 most dangerous London boroughs, and 6% more dangerous than the average for London⁸⁹.

As of January 2023, the most dominant crime in LBTH was violent crime, with antisocial behaviour (ASB) the second highest reported crime. Hospital admissions for violence (including sexual violence) are higher than the regional (44.3 per 100,000 people) at 59.9 admissions per 100,000⁵⁷. **Figure D-5** shows the current crime breakdown for LBTH.

⁸⁸ Metropolitan Police Service (2023) Monthly Crime Data New Cats. Available at: <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>

⁸⁹ CrimeRate. Tower Hamlets Crime Statistics. Available online at: <https://crimerate.co.uk/london/tower-hamlets>

Figure D-5 - Crime Breakdown for Tower Hamlets January 2023⁹⁰.



According to IMD19⁴², LBTH is ranked 28th out of 317 local authorities nationally (where 1 is the most deprived), placing it within the top 10% of most deprived local authorities nationally. Of the 144 LSOAs in LBTH, 31 are in the top 10% and a further 72 are top 20% of most deprived neighbourhoods nationally. With regards to crime deprivation, 25% of the 120 LSOAs in LBTH are in the most deprived 10% of LSOAs in the UK.

The main focus of Tower Hamlets Community Safety Partnership Plan 2021-2024⁹¹ is to reduce crime and anti-social behaviour by working to prevent crime and disorder, address substance misuse, reduce reoffending, and support young and vulnerable people from being drawn into extremist behaviour. Community Safety Partnerships are a requirement of the Crime and Disorder Act 1998⁹².

⁹⁰ UK Crime Stats – Tower Hamlets 2023 [online] Available at: <https://www.ukcrimestats.com/Subdivisions/LBO/11185/>

⁹¹ Tower Hamlets Community Safety Partnership Plan 2021-2024 (2021) Available at: https://www.towerhamlets.gov.uk/lgnl/community_and_living/community_safety_crime_preve/anti-social_behaviour/community_safety_partnership/csp-plan.aspx

⁹² Legislation.gov.uk, 1998. Crime and Disorder Act 1998. Available at: <https://www.legislation.gov.uk/ukpga/1998/37/contents>

Future Trends And Evolution Of The Baseline Without The Nlp

It is predicted that crime rates will likely increase post Covid-19⁹³, with increases in anti-social behaviour and violent crime rates, including sexual assault and domestic abuse, seeing the largest increases. The Council's Strategic Plan 2021-2026 (Priority 6: Empower Communities and Fight Crime) outlines that the LBTH will assist with more council-funded uniformed police officers to tackle crime.

As the population of LBTH increases, there are expected to be a greater number of vehicles on the borough's roads, which may result in an increase in the number of accidents and those KSI on roads. LBTH implements a number of road safety measures to support prevention of collision. These include⁹⁴:

- Providing road safety education in schools;
- Providing road safety information to members of the public;
- Promoting the children's traffic club;
- Running the junior road safety officers club; and
- Providing and managing the school crossing patrol service.

A new Local Plan could better support improvements to community areas and facilities to aid in reducing crime and anti-social behaviour and increase opportunities for community cohesion.

Issues and Opportunities

Issues and opportunities for crime and safety and the implications for the NLP have been identified in **Table D-6**.

Table D-6 – Issues and Opportunities for Crime and Safety

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There is potential to increase engagement within communities to encourage the reporting of crimes; 	<ul style="list-style-type: none"> ■ The NLP will need to ensure improvements to community areas to aid in reducing crime and anti-social behaviour;

⁹³ Office for National Statistics, 2022. Crime in England and Wales: year ending March 2022. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmarch2022>

⁹⁴ Tower Hamlets Council. Road Safety. Available online at: https://www.towerhamlets.gov.uk/lgnl/transport_and_streets/road_safety/road_safety.aspx

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour; ■ There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours; ■ As the population within LBTH increases there are expected to be a greater number of vehicles on the borough’s roads, which may result in an increase in the number of accidents and those KSI on roads; ■ Children in the most deprived neighbourhoods are nearly three times more likely to be KSI as a pedestrian compared to non-deprived neighbourhoods⁹⁵; ■ There are opportunities to increase the safety of active transport modes such as cycling and walking; ■ Vulnerable road users such as cyclists and pedestrians are more likely to be casualties; and ■ There is potential to increase the standards and safety of housing within the borough. 	<ul style="list-style-type: none"> ■ The NLP will need to ensure improvements to transport networks, including improving lighting, to ensure safety on networks; and ■ The NLP should seek opportunities to increase the safety of active transport modes such as cycling and walking.

⁹⁵ Centre for Transport Studies, Road Safety Research Briefing 1: Children and Traffic: Those in deprived areas still at disproportionate risk. Available online at: <https://www.ucl.ac.uk/transport/sites/transport/files/deprivation-and-road-safety-children.pdf>

Transport and Accessibility

Summary of Current Baseline

LBTH has excellent transport links and is a well-connected borough. The borough has access to the London Underground, Docklands Light Railway (DLR), National Rail connections, and the Elizabeth Line at Whitechapel and Canary Wharf stations. The DLR is a fully accessible railway, with stations having lift or ramp access to platforms. The borough has invested in making connections and access to stations more attractive, pleasant and easier to use⁹⁶.

Generally, the borough has relatively high Public Transport Accessibility Levels (PTALS). The southwest of the borough, in Spitalfields and Whitechapel, there are 'best' PTALS of 6b⁹⁷. Patchy areas traversing the north and south, in areas such as Bow, north of Poplar, and Isle of Dogs have lower PTAL outputs of 1a, indicating a lower rating by distance from frequent public transport services.

There is an extensive highways network throughout the borough, traversed by trunk roads such as the A11, A12 and A13 which carry large numbers of vehicles. The borough also benefits from 11km of cycle tracks along roads physically separated from traffic and pedestrians. There are about 53km of dedicated cycle routes in the borough (11km of which are physically separated from traffic and pedestrians) and 32.5km of pedestrian walkways⁹⁸.

LBTH is also within close proximity of major airports, including London City Airport (approx. 3.5 miles), London Heathrow (approx. 17 miles), and London Gatwick (approx. 25 miles).

As of 2021, there were approximately 45,768⁹⁹ registered cars in LBTH¹⁰⁰, which represents an increase of +7.4% since 2019. The number of licenced vehicles in London also increased over this period, but by a greater percentage of +9.8%.

The borough is attempting to expand its electric vehicle (EV) charging infrastructure to support its net zero ambitions and air pollution reduction targets, along with associated health benefits. The demand for EVs in the borough is high and growing, making investment

⁹⁶ Tower Hamlets Council (2019) London Borough of Tower Hamlets Third Local Implementation Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=143901>

⁹⁷ Transport for London, WebCAT. Available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

⁹⁸ Sustrans, Bike Life – Tower Hamlets, 2019 [online] available at: https://www.sustrans.org.uk/media/5954/bikelife19_tower-hamlets_web.pdf

⁹⁹ Vehicles are allocated to a local authority according to the postcode of the registered keeper. This is the keeper's address for privately owned vehicles or the company's registered address for company owned vehicles. The address does not necessarily reflect where the vehicle is located. This is especially true for large fleets kept by companies involved with vehicle management, leasing or rentals.

¹⁰⁰ London Datastore (2021) Department for Transport, Licensed Vehicles - Type, Borough. Available at: <https://data.london.gov.uk/dataset/licensed-vehicles-type-0>

in the network paramount. Since 2018, LBTH have installed 23 fast charging points¹⁰¹, with the majority in the borough comprising Type 2 (5kW) chargers¹⁰².

Despite LBTH having the third highest (66%) annual growth in EV registrations in inner London, the borough has the fourth highest (65%) of households more than 5 minutes walk from the nearest charger in inner London¹⁰³. There are evidently accessibility issues that need to be resolved to meet the needs of the growth of EVs in the borough.

The vast majority of jobs in LBTH are filled by non-residents and employees commuting from outside the borough, causing a major problem with congestion through LBTH. Excessive road traffic leads to congestion, air and noise pollution and contributes further to climate change. Provisional estimates show motor vehicles travelled 299.3 billion vehicle miles in Great Britain in 2021 which was 16.1% lower than pre Covid-19 levels (the year ending December 2019)¹⁰⁴. Government policy is focusing on promoting sustainable transport and encouraging walking and cycling for those journeys where these are realistic alternatives.

Since the Covid-19 pandemic the way people travel has changed, especially with 50.3% of people now working mainly at or from home¹⁰⁵. The borough has good levels of sustainable travel, with the borough coming 7th out of the London boroughs on the Healthy Streets Scorecard in 2022¹⁰⁶. The Healthy Streets Scorecard ranks London boroughs on how healthy their streets are according to ten indicators. However, this may change with the consultation on Low Traffic Neighbourhoods (LTNs) undertaken in January 2023 in the borough¹⁰⁷.

The most popular method of travel to work in LBTH is by train, underground, metro, light rail, or tram, with over 60.9% of residents using this mode of public transport¹⁰⁸. This is lower than the London average where 15.2% use this method of travel to work and may be the result of 42.1% of people working mainly at or from home. Comparing the most popular

¹⁰¹ [Electric vehicle charging in Tower Hamlets | Let's Talk Tower Hamlets](#)

¹⁰² [Map of electric charging points for electric cars UK: Zapmap \(zap-map.com\)](#)

¹⁰³ Tower Hamlets Council. Charging Forward. Tower Hamlets electric vehicle delivery plan: 2021-2025. Available at: [Tower Hamlets electric vehicle delivery plan: 2021-2025 \(amazonaws.com\)](#)

¹⁰⁴ Department for Transport (2021) Provisional road traffic estimates, Great Britain: October 2020 to September 2021 Available at: <https://www.gov.uk/government/statistics/provisional-road-traffic-estimates-great-britain-october-2020-to-september-2021#:~:text=Provisional%20estimates%20show%20motor%20vehicles,%2C%20an%20increase%20of%200.4%25>

¹⁰⁵ Office for National Statistics (2022) Travel to work, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkeinglandandwales/census2021>

¹⁰⁶ Healthy Streets Scorecard (2022) 2022 Scorecard results overview. Available at: <https://www.healthystreetsscorecard.london/results/>

¹⁰⁷ Healthy Streets Scorecard (2022) Tower Hamlets. Available at: https://www.healthystreetsscorecard.london/your_borough/tower-hamlets/

¹⁰⁸ Office for National Statistics (2020) Method of travel to work. Available at: [Method used to travel to work - Office for National Statistics \(ons.gov.uk\)](#)

method of travel to work in the borough to the national average indicates considerably lower proportions of people using train, underground, metro, light rail, or tram to travel to work, at 3.9% (-57%). The most popular method of travel to work in England is by driving a car or van, at 44.5%.

Although there are many dedicated cycle routes and pedestrian walkways in the borough, only 10.7% use bicycles or travel on foot to work (as of 2020), and only 11% of residents cycle at least once a week⁹⁸. Despite this, residents in the borough cycling each day takes up to 2,600 cars off the road, and there is ambition amongst the population to increase the use of this mode of transport, with 36% feeling they should cycle more⁹⁸.

Future Trends and evolution of the baseline without the NLP

During the Covid-19 pandemic homeworking has been encouraged for those who are able, leading to a short-term reduction in travel demand and increased financial pressure on the operators. This trend will likely continue as employers look to maintain flexible working conditions in future. In addition, peak periods for traffic congestion are likely to change with less people commuting for work. Public transport will need to adapt to these altered working and lifestyle patterns and encourage more passengers.

As the population in LBTH is becoming younger, and the majority of the population will continue to be of working age, there is likely to be additional demand on the borough's services and transport infrastructure. With public transport infrastructure already under stress with overcrowding and congestion, the transport industry will need to adapt meet the differing needs of this demographic change.

Transport must become accessible and affordable for all that live and work in the borough to reduce inequalities and meet Outcome 6 of the Tower Hamlets Transport Strategy 2019-2041¹⁰⁹.

The borough has a commitment to become net-zero by 2045 or sooner through the Net Zero Carbon Partnership Action Plan¹¹⁰. This will require modal shifts to active transport, to shift the dependency of commuters away from cars and public transport. LBTH Cycling Strategy endeavours to increase the proportion of residents cycling to work to 12 per cent by 2025¹¹¹.

As part of the council's and wider London's commitment to improving air quality the borough is situated within the Ultra Low Emission Zone (ULEZ) that operates 24 hours a day, seven

¹⁰⁹ Tower Hamlets Council (2019) Tower Hamlets Transport Strategy 2019-2041. Available at: <https://democracy.towerhamlets.gov.uk/ieDecisionDetails.aspx?ID=7286>

¹¹⁰ Tower Hamlets Council (2021) Net Zero Carbon Partnership Action Plan. Available at: <https://democracy.towerhamlets.gov.uk/ieDecisionDetails.aspx?id=7524>

¹¹¹ Tower Hamlets Council (2016) Tower Hamlets – A Cycling Borough. Available at: https://www.towerhamlets.gov.uk/lgnl/transport_and_streets/cycling/cycling_strategy.aspx

days a week, every day of the year (except Christmas Day)¹¹², which involves daily penalties for non-compliant vehicles.

To help meet this target, electric and hybrid vehicles are expected to become dominant (with the ban on new petrol and diesel car vehicle sales in the UK by 2035), requiring provisions such as electric charging points to be made for these vehicles across the borough.

Without the NLP transport improvements and developments will likely still come forward in the borough, due to the overarching Transport Strategy⁸⁰ and supplementary plans such as the Cycling Plan⁸². However, the NLP will enable the borough to better plan any necessary, large and small-scale improvements to its public transport and active travel networks and put in plan policies that support new developments and increasing demand.

Issues and Opportunities

Issues and opportunities for transport and accessibility and the implications for the NLP have been identified in **Table D-7**.

Table D-7 – Issues and Opportunities for Transport and Accessibility

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There is a need to improve sustainable transport modes (public and active) in line with LBTH’s commitment to reach net-zero GHG emissions by 2045; ■ Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs; ■ Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender; 	<ul style="list-style-type: none"> ■ There is a need to support the reduction of GHG emissions within the transport industry towards net-zero through the better provision of sustainable transport; ■ Site selection should account for future climate change, and consider locating transport infrastructure away from areas of high flood risk, or where road drainage may impact on water quality issues; ■ The NLP should maximise opportunities to integrate connected blue and green infrastructure along transport corridors;

¹¹² Transport for London, Ultra Low Emission Zone. Available at: <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone>

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Changing work habits such as remote, internet-based jobs and working from home are likely to reduce transport demand; and ■ Health inequalities are prevalent in the borough, therefore reducing significant issues with traffic and congestion and subsequent air pollution is of utmost importance. 	<ul style="list-style-type: none"> ■ Improving availability, connectivity, reliability and affordability of public transport; and ■ There is a need to support greater access to services and facilities for the changing demographics.

Biodiversity and Natural Capital

Summary of Current Baseline

LBTH is a predominantly urban area and contains no internationally or European designated sites. There are numerous nationally designated sites within the greater London area, notably Site of Special Scientific Interest (SSSI), designated under the Wildlife and Countryside Act (1981)¹¹³, as amended. Gilbert's Pit (Charlton) SSSI in Greenwich is in closest proximity to LBTH, a geological SSSI covering 5.2Ha.

There are also the following European protected sites within 10km of the borough boundary:

- Special Protection Area (SPA): Lee Valley
- Ramsar Sites: Lee Valley
- Special Area of Conservation (SAC): Epping Forest

Lee Valley SPA is designated for Bittern (*Botaurus stellaris*), Gadwall (*Anas strepera*), and Shoveler (*Anas clypeata*). Lee Valley Ramsar Site is also designated for Gadwall and Shoveler, along with Water boatman (*Micronecta minutissima*) and Whorled water-milfoil (*Myriophyllum verticillatum*). All three bird species are list as amber on the Birds of Conservation Concern 5 (BoCC5)¹¹⁴, with Bittern showing a decreasing population trend on the IUCN Red List¹¹⁵.

¹¹³ Wildlife and Countryside Act 1981. Available at: <https://www.legislation.gov.uk/ukpga/1981/69/contents>

¹¹⁴ Stanbury, A. J. et al. (2021) The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. Available at: <https://www.bto.org/our-science/publications/birds-conservation-concern/status-our-bird-populations-fifth-birds>

¹¹⁵ IUCN Red List, The IUCN Red List of Threatened Species. Available at: <https://www.iucnredlist.org/en>

Epping Forest SAC supports Northern Atlantic wet heaths, European dry heaths, Atlantic acidophilous beech forests, and Stag beetle (*Lucanus cervus*) as qualifying habitats and species. All European designations within 10km of the borough boundary are legally underpinned by their respective SSSIs.

LBTH has an abundance of parks and open spaces which provide important habitat for wildlife, many of which are designated as Local Nature Reserves (LNRs). These include Tower Hamlets Cemetery Park, Ackroyd Drive, and Mudchute Park Farm, and cumulatively comprise an area of 25.78Ha.

The borough also has Sites of Importance for Nature Conservation (SINCs) which are London's equivalent of Local Wildlife Sites (LWSs) and are non-statutory designations. SINCs are identified in a four-tier system: Sites of Metropolitan Importance, Sites of Borough Importance (Grades 1 and 2) and Sites of Local Importance. There are 35 SINCs in LBTH¹¹⁶, benefitting from a high level of protection within the planning system, including:

- Six Sites of Metropolitan Importance;
- Four Sites of Borough Importance (Grade 1);
- 12 Sites of Borough Importance (Grade 2); and
- 13 Sites of Local Importance.

The habitat of LBTH is predominantly urban, however, there are a range of habitats in parks, cemeteries, waterways, brownfield sites, and gardens. There are also discrete sections of Priority Deciduous Woodland scattered across the borough. Epping Forest SAC woodland site is one of the best examples of Atlantic acidophilous beech forest in its UK range, and Lee Valley SPA / Ramsar wetland site is composed of a series of reservoirs and reedbed habitat.

The loss, fragmentation, and deterioration of natural habitats in the UK has caused a decline in the provision of many ecosystem services, with 41% of all UK species having declined since the 1970s¹¹⁷. Habitat loss has been prevalent for open mosaic habitats resulting from derelict sites being redeveloped, and the reason for the decline of species such as the House Sparrow (*Passer domesticus*) in the borough as well as London is largely unknown but could be attributed to habitat loss, pollution, predation and possibly disease¹¹⁸.

¹¹⁶ [Sites of importance for nature conservation \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

¹¹⁷ NBN (2019) State of Nature Report. Available at: <https://nbn.org.uk/stateofnature2019/reports/>

¹¹⁸ Tower Hamlets Council (2019) Tower Hamlets Local Biodiversity Action Plan 2019-2024. Available at: <https://www.towerhabitats.org/wp-content/uploads/2020/09/TowerHamletsLocalBiodiversityActionPlan2019-24.pdf>

According to the Natural Environment Valuation Online (NEVO) tool species richness data¹¹⁹, LBTH has 32 species present in the current decade, out of 100 priority species chosen by the Joint Nature Conservation Committee (JNCC). These are broken down as follows:

- Plants – 14 out of 38 species;
- Invertebrates – 8 out of 25 species;
- Birds – 6 out of 17 species;
- Mammals – 4 out of 14 species;
- Lichen – 0 out 5 species; and
- Herptiles – 0 out of 1 species.

The NEVO tool also indicates that out of the 2,000ha comprising the borough, 80% of the land cover is urban, with only 0.9% consisting of semi-natural grassland or woodland.

Natural capital is a key theme in the Government's 25-year Environment Plan: A Green Future¹²⁰. The UK's natural capital accounts show that approximately 20-25 million tonnes of carbon have been sequestered by vegetation in the UK each year between 2007 and 2015, while around 1.5 million tonnes of air pollutants have been removed each year. This equates to a monetary value of approximately £1.5 billion for carbon sequestration and £1 billion for pollution removal in 2015. By comparison, according to the NEVO tool, LBTH sequestered just 17 tonnes of CO₂ a year, equating to a monetary value of £113. Natural capital can play a significant part in mitigating the effects of emissions and climate change.

The important role of natural capital is also prevalent for London, with London's public green spaces having a gross asset value of more than £91 billion, providing services valued at £5 billion per year¹²¹. The total value of publicly accessible greenspace in LBTH is £2.0 billion, with associated benefits in carbon storage (£0.11 million) and temperature regulation (£20 million)¹²².

Green Infrastructure (GI) provides a strategically planned network of nature and semi-natural areas, designed, and managed to deliver ecosystem services, and provides a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. GI in LBTH includes parks and playing fields, nature reserves and natural

¹¹⁹ University of Exeter, NEVO, [online] available at: <https://www.exeter.ac.uk/research/leep/research/nevo/>

¹²⁰ Defra (2018) 25 Year Environment Plan. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

¹²¹ Mayor of London (2017) Natural capital accounts for public green space in London: Report prepared for Greater London Authority, National Trust and Heritage Lottery Fund. Available at: [11015viv_natural_capital_account_for_london_v7_full_vis.pdf](https://www.london.gov.uk/sites/default/files/11015viv_natural_capital_account_for_london_v7_full_vis.pdf)

¹²² Mayor of London (2017) Natural capital accounts for public green space in London: Local authority summaries. Available at: [11015viv_nca_by_borough.pdf](https://www.london.gov.uk/sites/default/files/11015viv_nca_by_borough.pdf) (london.gov.uk)

habitats, and allotments and urban greening. However, due to the urban density of the borough there is a sense of open space deficiency.

In addition to GI, the borough has a substantial amount of blue infrastructure (BI) which can provide important habitats and ecosystem services. Key areas include Millwall Outer Dock, South Dock, Blackwell Basin, Poplar Dock Marina, North Dock, Limehouse Basin and the River Lea. Combining blue and green Infrastructure (BGI) elements together is an effective way of providing a sustainable natural solution to urban and climatic challenges.

Urban greening is measured using the Urban Greening Factor (UGF) tool which evaluates both quality and quantity of proposed urban greening. This system will enable LBTH to comply with Policy G5 Urban Greening of the London Plan **Error! Bookmark not defined.**, making the urban greening required for a development measurable.

The Tower Hamlets Green Grid Strategy¹²³ aims to create a framework for the design and delivery of appealing walking routes and associated GI across the borough. This strategy is essential to reduce the sense of open space deficiency, with the borough having less than the local open space standard of 1.2 hectares per 1,000 residents¹²⁴. Design considerations for interventions which respect the local character and are designed to be low maintenance will enable the benefits of GI to be maximised in the future. The purpose of the Parks and Open Space Strategy 2017-2027¹²⁵ is:

- Managing the impact of population growth on the provision of open spaces;
- Attracting and guiding investment in parks and open spaces to the best effect for Tower Hamlets;
- Contributing to sustainable development;
- Addressing competing demands on parks and open spaces; and
- Mitigating the revenue costs for the council of providing parks and open spaces in Tower Hamlets.

Future Trends and evolution of the baseline without the NLP

The 2019 State of Nature Report¹¹⁷ highlights the general decrease in biodiversity in the UK. Since 1970, species abundance has decreased by 13% and species distribution has decreased by 5%. Of the 8,431 species that have been assessed using the International

¹²³ Land Use Consultants (2017) Tower Hamlets Green Grid Strategy: Update 2017. Available at: [Tower Hamlets Green Grid Strategy: Update](#)

¹²⁴ LUC (2016) Tower Hamlets Open Space Audit

¹²⁵ Parks and Open Spaces: An open space strategy for the London Borough of Tower Hamlets 2017-2027. Available at: [170904_CAB_submission \(towerhamlets.gov.uk\)](#)

Union for Conservation of Nature (IUCN) Regional Red List criteria, 15% are currently threatened with extinction from Great Britain and 2% are already extinct.

Rising population and urbanisation of natural areas can further exacerbate habitat fragmentation and decreases in biodiversity. Species distribution may shrink in LBTH if developments continue to separate habitat corridors connecting the LNRs, specifically Tower Hamlets Cemetery Park and Ackroyd Drive. There are a number of areas which are considered to be deficient in nature, a trend that could continue to rise. This highlights the need for green spaces.

Climate change presents another threat to ecosystem services and biodiversity. Current IPCC¹²⁶ predictions for temperature increases are expected to be 2°C by the middle of the 21st century. This increase in temperature is expected to lead to increases in flooding events and northward colonisation of species in the UK. Increased flooding will need to be mitigated, especially as large parts of LBTH are situated within a flood risk zone 3. In order to preserve biodiversity and natural habitats, soft engineering and nature-based solutions will need to be used over traditional hard engineering.

The Environment Act¹²⁷ specifies a mandatory 10% increase in biodiversity net gain (BNG) for new developments. This will apply from January 2023 for developments¹²⁸ that fall under the Town and Country Planning Act 1990¹²⁹. Biodiversity on development sites will need to be preserved, with additional mitigation put in to increase biodiversity. This increase in biodiversity may be provided on site enhancement, or through off-site compensation.

As part of the LBTHs Net Zero Carbon Plan¹³⁰ in response to declaring a climate emergency, the following ambitions relevant to biodiversity and natural capital were identified:

- 2025: Average UGF of 0.3
- 2035: Average UGF of 0.4
- 2050: Average UGF of 0.4

The council has identified that it is not possible to plant enough trees to meaningfully offset total emissions, so as many trees as possible should be planted¹³¹. Trees that are planted

¹²⁶ IPCC (2022) Climate Change 2022: Impacts, Adaptation and Vulnerability. Available at: <https://www.ipcc.ch/report/ar6/wg2/>

¹²⁷ Environment Act (2021). Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

¹²⁸ Unless exempt. The law will apply to small developments from April 2024.

¹²⁹ Town and Country Planning Act 1990 ([legislation.gov.uk](https://www.legislation.gov.uk))

¹³⁰ Tower Hamlets Council (2020) Net Zero Carbon Plan. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=165906>

¹³¹ London Borough of Tower Hamlets, Net Zero Carbon Plan, 2020, [online] available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=165906>

must be diverse and native species. LBTH would need further reductions in emissions from forestry in other local authorities, potentially through a future national trading scheme.

London is implementing a Rewild London Fund 2022¹³², providing £850,000 of funding to create new habitats in line with London Environment Strategy¹³³ targets, with local authorities eligible to apply for funding to support projects.

The Tower Hamlets Local Biodiversity Action Plan (LBAP)¹¹⁸ sets out a series of actions for the built environment, gardens and grounds, rivers and standing water, and parks, squares and burial grounds. The LBAP identifies priority habitats and species in the borough, and sets objectives and, where appropriate, targets for what needs to be done to ensure their conservation and inform the implementation of future projects and actions.

It is clear that there are a number of ongoing initiatives and plans within the borough that will help to conserve and enhance biodiversity and natural capital and which would be expected to continue without the NLP. However, there is potential that without the NLP some sites and habitats could be threaten by development in inappropriate locations. The NLP may also provide opportunities to increase biodiversity and natural capital assets.

Issues and Opportunities

Issues and opportunities for biodiversity and natural capital and the implications for the NLP have been identified in **Table D-8**.

Table D-8 – Issues and Opportunities for Biodiversity and Natural Capital

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas, notably the European designations; ■ Increasing population and developments may result in worsening air quality that may degrade the borough’s valuable ecological receptors; ■ Development adjacent to watercourses are expected to contribute to achieving Water 	<ul style="list-style-type: none"> ■ Developments will need particular attention to potential environmental impacts. ■ Development and site allocation of the new NLP will need to include stringent standards for the protection and enhancement of biodiversity and natural capital. ■ The NLP should look to develop new green spaces to support the

¹³² London.gov.uk (2022) Rewild London Fund 2022. Available at: <https://www.london.gov.uk/publications/rewild-london-fund-2022>

¹³³ Mayor of London (2018) Greater London Authority, London Environment Strategy. Available at: https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf

Key Risks/Opportunities	Implications for the NLP
<p>Framework Directive objectives relating to ecological status; this includes connectivity for fish and removal of invasive species;</p> <ul style="list-style-type: none"> ■ New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity, including consideration of watercourses from the start of the design process in order to maintain the increase in biodiversity over the statutory 30 year period. Developments that seek to create habitat to support species identified as declining should be prioritised; and ■ The inclusion of BGI can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island (UHI) effects and help to make developments more climate resilient, especially when it comes to flood mitigation. 	<p>borough's growing population and reduce open space deficiency.</p> <ul style="list-style-type: none"> ■ The NLP should prioritise the connection of green spaces in the borough by implementing green corridors to improve GI. ■ The NLP will need to encourage development opportunities to remove in-channel structures when present within the watercourse, the use of hard engineering should require strong justification; ■ The NLP will need to address plans for flood mitigation. Creation and use of nature-based solutions and ecosystems services for flooding can be included. ■ The NLP should establish guidelines for biodiversity net gain to support developers

Landscape and Townscape

Summary of Current Baseline

Landscape and townscape is the visual aesthetic of the natural or built environment. The landscape takes its character from a combination of elements, including topography, watercourses, land use and pattern, vegetation, open space, and cultural heritage features. The topography of the borough is generally flat along the river front to the south, with some sections of the Isle of Dogs at sea level or below (< 0m)¹³⁴. The elevation of the land increases towards the northwest and at discrete locations such as Canary Wharf (up to 39m). The average elevation in the borough is 9m.

¹³⁴ [London Borough of Tower Hamlets topographic map, elevation, terrain \(topographic-map.com\)](https://www.topographic-map.com/)

LBTH is predominantly urban; however, there are over 200 parks and greenspaces within the borough, and 170 are publicly accessible, most notably Victoria Park and Mile End Park. Victoria Park is the borough’s largest park, covering over 80Ha¹³⁵.

Metropolitan Open Land (MOL) is strategic open land within the urban area, afforded the same level of protection as the Green Belt. Despite there being no designated Green Belt land within the borough, 7.6% of LBTH is MOL¹³⁶. These designations restrict development to heavily developed areas in LBTH.

LBTH falls within two of Natural England's National Character Areas (NCAs)¹³⁷. These are defined in **Table D-9** below.

Table D-9 – National Character Areas within Tower Hamlets

NCA	Description
81: Greater Thames Estuary	<ul style="list-style-type: none"> • Predominantly a remote and tranquil landscape of shallow creeks, drowned estuaries, low-lying islands, mudflats and broad tracts of tidal salt marsh and reclaimed grazing marsh that lies between the North Sea

¹³⁵ [BoroughProfileEnvironment.pptx \(live.com\)](#)

¹³⁶ RCKa. Small Sites in London: London Borough of Tower Hamlets. Available at: [RCKa Small Sites: London Borough of Tower Hamlets – RCKa: Small Sites](#)

¹³⁷ Natural England (2014) Corporate report: National Character Area profiles. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

NCA	Description
	<p>and the rising ground inland.</p> <ul style="list-style-type: none"> • It forms the eastern edge of the London Basin and encompasses the coastlines of South Essex and North Kent, along with a narrow strip of land following the path of the Thames into East London. • There are busy urban and industrial areas towards London where population density is high and development pressures are increasing. Historic military landmarks are characteristic features of the coastal landscape.

NCA	Description
112: Inner London	<ul style="list-style-type: none"> • Predominantly urban and lies at the centre of the Thames Basin on a broad flood plain which rises in gentle terraces, providing panoramic views of London’s skyline from the clay plateaux and ridges in the north at the border with the Northern Thames Basin. • The NCA is steeped in both historical and contemporary culture; it is the centre of UK Government and a major international hub for finance, business, tourism, transport and

NCA	Description
	<p>recreation. Owing to its urban nature, Inner London relies heavily on ecosystem services provided by the surrounding NCAs, such as flood alleviation, air temperature regulation and recreational services. For example, the Thames Barrier in the Greater Thames Estuary is a major tidal flood defence for London. However, the extensive network of green infrastructure throughout the NCA provides outdoor recreation and wildlife habitat close to people's</p>

NCA	Description
	<p>homes and places of work.</p> <ul style="list-style-type: none"> • Reservoirs and wetlands such as the Lea Valley in the east provide opportunities for birding and fishing, as well as walking, cycling and boating. water-based activities are provided along the Thames and its tributary rivers. Parks and green spaces scattered among the built environment provide highly valued pockets of perceived tranquillity. • Nevertheless, many communities in London

NCA	Description
	<p>suffer a shortage of green space close to where they live. The Thames Path National Trail also provides extensive walking opportunities following the river together with strategic walking routes such as the Capital Ring and the Jubilee Walkway.</p>

The Green Flag Award® is a non-profit international accreditation programme that recognises and rewards well managed parks and green spaces¹³⁸, and 13 of the borough’s parks benefit from such award. The London in Bloom campaign have also provided nine gold awards to the borough, with the borough awarded the ‘City’ category for 2022¹³⁹.

Townscape includes the buildings and the activities and spaces between them, with the public realm an important feature of the townscape. Views are considered as intrinsic to local character, and London Boroughs are required to designate local views and landmarks. The London View Management Framework SPG¹⁴⁰ identifies the silhouette of Canary Wharf as a recognisable feature in numerous panoramic views of London and is designated as a “Skyline of Strategic Importance”. There are a total of 39 landmarks and 92

¹³⁸ Green Flag Award (2023) Available at: <https://www.greenflagaward.org/#>

¹³⁹ London In Bloom (2023) <https://londoninbloom.co.uk/>

¹⁴⁰ Mayor of London (2012) London View Management Framework. Available at: [London View Management Framework | London City Hall](#)

views identified in conservation area appraisals and management guidelines for the borough¹⁴¹.

LBTH includes some of London's destination high streets including Columbia Road Flower Market, Brick Lane's curry houses, Bethnal Green's craft beer pubs and night life, Whitechapel's growing transport and civic hub and the rich East End history linked to Chrisp Street and Roman Road¹⁴². Town centres are the economic, transport, social and civic hearts of the borough, with the borough having eight district centres:

- Bethnal Green
- Brick Lane
- Chrisp Street
- Middlesex Street
- Roman Road East
- Roman Road West
- Watney Market
- Whitechapel
 - The borough has number of major tourist attractions which include:
 - The Museum of London Docklands;
 - The Tower of London;
 - Tower Bridge;
 - Canary Wharf;
 - Victoria Park; and
 - Whitechapel Gallery.

Future Trends and evolution of the baseline without the NLP

Landscape and townscape character and quality is under particular threat from future development through, for example, loss of tranquillity, increased lighting, visual intrusion and the incremental loss of landscape features and characteristic elements.

¹⁴¹ Tower Hamlets Council (2018) Local Plan Topic Paper D.DH4 Managing and Shaping Views. Available at: [Topic Paper Views and Landmarks 2018.pdf \(towerhamlets.gov.uk\)](#)

¹⁴² Tower Hamlets Council. Tower Hamlets High Streets & Town Centres Strategy 2017 – 2022. Available at: [6.6a%20-%20App1%20-%20High%20Streets%20Town%20Centre%20Strategy%202017-2022.pdf \(towerhamlets.gov.uk\)](#)

Similarly, pressures from expanding populations put more strain on existing systems, and more pressure on recreational landscapes and tourist attractions.

Growth will also increase the demand for open spaces, and place challenges on LBTH to meet this demand, especially when faced with the current financial pressures experienced nationwide. Despite this, residents will need access to high quality open space, increasing the provisions required.

The Parks and Open Space Strategy 2017-2027 acknowledges the need to attract investment for the borough’s increasing demand for open space¹⁴³.

Without a NLP there may be reduced opportunities for new development to enhance and support the local landscape and townscape character through, quality design, provision of green infrastructure and/or habitat creation.

Issues and Opportunities

Issues and opportunities for landscape and townscape and the implications for the NLP have been identified in **Table D-10**.

Table D-10 – Issues and Opportunities for Landscape and Townscape

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Development has the potential to cause direct and indirect impacts on designated landscapes and townscapes, affecting the character and sense of place; ■ Future growth could risk compromising landscape and townscape character and features. However, design that incorporates public realm and GI principles could play a key role in the enhancement of the natural environment, visual amenity and physical and mental health of the borough’s people; ■ There is opportunity to increase greenspace access and subsequently, to improve health and wellbeing, combat air pollution, provide 	<ul style="list-style-type: none"> ■ The NLP must consider the setting of landscape and townscape assets and tourist destinations, ensuring development enhance setting. ■ The NLP must consider the importance of landscape and townscape character when outlining options, ensuring development does not erode the quality and key characteristics of the landscape and townscape, and instead respects it. ■ The NLP must protect the views that comprise the urban skyline, including the visibility of important

¹⁴³ Tower Hamlets Council (2017) Parks and Open Spaces: An open space strategy for the London Borough of Tower Hamlets 2017-2027. Available at: https://www.towerhamlets.gov.uk/ignl/leisure_and_culture/parks_and_open_spaces/open_space_strategy.aspx

Key Risks/Opportunities	Implications for the NLP
<p>storm water management and reduce flooding (contributing to climate change adaptation and mitigation) and provide connectivity through urban built form to the countryside for wildlife. It can also bring new audiences to tourist attractions and enable better appreciation of historic landscape assets through creating new views and vistas, providing information and enhancing access</p>	<p>landmarks, to comply with requirements for tall buildings and respect the unique visual amenity of the borough’s setting.</p> <ul style="list-style-type: none"> ■ To NLP must develop better contextual townscape design to enable new developments of greater density than existing to integrate and reflect the borough’s special character. ■ The NLP may seek to enhance the setting of its landscape and townscape assets and increase urban greening. ■ The NLP may consider encouraging the public use of green spaces and encourage preservation of assets.

Historic Environment

Summary of Current Baseline

LBTH possesses a great diversity of heritage assets of international to local importance and priority. The borough takes its name from the historical association with the Tower of London and the surrounding hamlets, characterised by a long history of maritime and trade activity, and migration and change. LBTH has a comprehensive strategy for regeneration and enhancement of such heritage assets¹⁴⁴.

Heritage assets make a significant contribution to the quality of life for those living, working or visiting LBTH. There are a number of designated assets throughout LBTH¹⁴⁵, including:

- Two World Heritage Sites;
- Nine Scheduled Monuments;

¹⁴⁴ Tower Hamlets Council (2017) Conservation Strategy 2017-2027. Available at: [https://www.towerhamlets.gov.uk/lgnl/planning and building control/conservation and urban design/conservation and urban design.aspx](https://www.towerhamlets.gov.uk/lgnl/planning%20and%20building%20control/conservation%20and%20urban%20design/conservation%20and%20urban%20design.aspx)

¹⁴⁵ Historic England - Search the list. Available at: <https://historicengland.org.uk/>

- 13 Grade I Listed Buildings;
- 40 Grade II* Listed Buildings;
- 2,000 Grade II Listed Buildings¹⁴⁶;
- 210 Locally Listed Buildings;
- 58 Conservation Areas; and
- Five Registered Parks and Gardens.

The Tower Hamlets Local List identifies locally important heritage assets that are valued by the local community, these are also referred to as non-designated heritage assets (visible, buried or submerged). Although not designated, these assets are material planning considerations and the NPPF and draft policies contain references to them. There are currently 210 locally listed buildings and 44 locally listed war memorials within the borough.

The Greater London Historic Environment Record (GLHER)¹⁴⁷ is a comprehensive and dynamic resource for the historic environment of Greater London, with data supporting the work of the Greater London Archaeological Advisory Service (GLAAS). The record contains over 87,000 entries, with 1,122 of these in LBTH.

The two designated World Heritage Sites were designated by UNESCO for their 'Outstanding Universal Value', which have been inscribed on the World Heritage List by the World Heritage Committee. World Heritage Status is a high accolade that brings international scrutiny. The designated World Heritage Site's situated partially or wholly within the borough, and occupying buffer zones, are:

- Tower of London World Heritage Site, The Tower of London (inscribed 1988)
- Maritime Greenwich World Heritage Site, Island Gardens (inscribed 1997)

Historic England's Heritage at Risk (HAR)¹⁴⁸ programme helps to understand the overall state of England's heritage sites. It identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. In LBTH, there are 36 assets on the HAR register; one Scheduled Monument, five Conservation Areas, 24 Grade II listed buildings, four Grade II* listed buildings, and two Grade I listed buildings.

Historic England provides specific guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes, set against the background of the National Planning Policy Framework (NPPF)

¹⁴⁶ Grade I Listed Buildings are of exceptional interest. Grade II* Listed Buildings are particularly important buildings of more than special interest. Grade II buildings are of special interest.

¹⁴⁷ Greater London Historic Environment Record (GLHER) Available at: <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-historic-environment-record/#Online>

¹⁴⁸ Heritage at Risk (2022) Available at: <https://experience.arcgis.com/experience/cb50293b60cd42e98f7d312cec9115a9/>

and the related guidance given in the Planning Practise Guide (PPG). In addition to the visual setting, 'setting' can also include intangible such as sound, smells, and historic associations / relationship

An Archaeological Priority Area (APA) is a defined area where, according to existing information, there is significant known archaeological interest or potential for new discoveries¹⁴⁹. All parts of the borough fall into one of four different tiers of archaeological significance and potential (Tier 1-3 constituting an APA, and Tier 4 outside an APA). There are a total of 31 APAs in the borough, of which six are Tier 1 APA, 23 are Tier 2 APAs and two are Tier 3 APAs, cumulatively covering approximately 74% of the borough¹⁵⁰.

Future Trends and evolution of the baseline without the NLP

Protection of the historic environment is firmly embedded in national and local policy, and this has been the case since 1990. This policy has developed independently of the European Union and is unlikely to change with the Retained EU Law Bill. However, whilst harm to the significance of heritage assets is largely restricted, harm to the setting of heritage assets still occurs; for example, relating to visual intrusion, or aspects such as traffic, lighting, and noise. This can be a sensitive planning issue.

One trend over the last few years which may well continue, is the reduction in funding for Historic England and county and local authorities, with increased pressure on the case workload of Archaeological Officers, Conservation Officers, and Historic England advisors. This can have an impact on the response times for the provision of planning advice.

The reduction in funding for Historic England also has an impact on the number of and the scale of grants for the Historic Environment, this includes to grants to heritage assets at risk. Therefore, these heritage assets likely to see a decline in their preservation, and an increase in heritage at risk that is lost.

The number of vehicles on the roads is likely to increase as the borough's population rises, increasing air pollution and road traffic. This has the potential to harm the settings of World Heritage Sites, listed buildings, scheduled monuments and parks and gardens, as well as conservation areas.

Expansion of roads and the development of new residential and commercial areas, to accommodate the increased number of private vehicles, road traffic, and population increase, will put pressure on land space and could result in land take from heritage assets. Depending on the scale and nature of land take, as this may harm both the setting and characteristics of assets.

¹⁴⁹ [Greater London Archaeological Priority Areas | Historic England](#)

¹⁵⁰ Historic England (2017) London Borough of Tower Hamlets: Archaeological Priority Areas Appraisal. Available at: <https://historicengland.org.uk/content/docs/planning/apa-tower-hamlets-pdf/>

Climate change also poses a risk of harm to heritage assets, their characteristics, and settings, particularly through increased flooding, extreme heat events, and changes to energy requirements. Historic England have outlined guidance to achieving net zero targets and adapting the heritage environment to climate change – this is focussed on reusing UK homes built before 1919 (approximately 20% of the UK’s housing resource) and adapting their energy needs¹⁵¹.

Protection of the historic environment is likely to be maintain through existing local, regional and national plans and policies, however without the NLP there may be reduced opportunities for new development to enhance and support the local heritage character and strike the right balance between protection and enhancement the need for development.

Issues and Opportunities

Issues and opportunities for the historic environment and the implications for the NLP have been identified in **Table D-11**.

Table D-11 – Issues and Opportunities for Historic Environment

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active modes and asset settings; ■ Trans-boundary matters should be noted and the impact that development in LBTH may have on heritage in other boroughs; ■ There is potential for development to encroach on assets and their settings, particularly through land take, increased noise and visual effects. Although damage to the significance and setting of assets from development is not limited to these factors; Archaeological remains, whether designated or not, can require preservation in situ. This clearly has implications and can represent a 	<ul style="list-style-type: none"> ■ There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active forms of transport. ■ The NLP should preserve and enhance the current settings of heritage assets, both designated and non-designated. ■ The NLP must consider the importance of local historic character when outlining options, ensuring that development doesn't erode the quality and key characteristics of assets.

¹⁵¹ Historic England, 2022. Climate Change: Mitigation, Adaptation and Energy Measures. [online] Available at: <https://historicengland.org.uk/whats-new/features/climate-change/>

Key Risks/Opportunities	Implications for the NLP
<p>significant constraint to future scheme design, which should respect, retain and protect the remains (e.g. through avoidance and redesign); and</p> <ul style="list-style-type: none"> Vehicle damage and pollution can adversely affect World Heritage Site's, listed buildings and scheduled monuments, so reducing vehicle movements within historic areas is also important to address. 	<ul style="list-style-type: none"> The NLP should include measures to minimise climate change impacts on the historic environment. The NLP should ensure that development adjacent, or in close proximity to the local conservation areas, designated assets, archaeological remains or listed buildings, respects their character and setting, and does not detract from the quality of the built environment.

Water Environment

Summary of Current Baseline

The borough falls within the Thames River Basin District, and the London Management Catchment. The Lee Lower Rivers and Lakes Operational Catchment feeds into the Lee (Tottenham Locks to Bow Locks/Three Mills Locks) Water Body. This is a heavily modified water body and has a catchment area of 45.185 km¹⁵², with the River Lee Navigation draining into Limehouse Basin.

The Water Framework Directive (WFD)¹⁵³ sets an objective of aiming to achieve at least 'good' status for all waterbodies by a set deadline specific for each waterbody. Most of the monitored waterbodies are 'main rivers' that are under the jurisdiction of the Environment Agency. **Table D-12** below show the water quality (ecological and chemical) of the 27 waterbodies in the Lee Lower Rivers and Lakes Operational Catchment for the 2019 Cycle 3.

Table D-12 – Water quality (ecological and chemical status) of the Lee Lower Rivers and Lakes Operational Catchment¹⁵²

¹⁵² Environment Agency. Catchment Data Explorer - Thames River Basin District. Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/6>

¹⁵³ Department for Environment, Food & Rural Affairs (2014) Water Framework Directive implementation in England and Wales: new and updated standards to protect the water environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf

Operational Catchment	Classification							
	Ecological Status					Chemical Status		
	Total Water Bodies	High	Good	Moderate	Poor	Bad	Fail	Good
Lee Lower Rivers and Lakes	27	0	1	16	9	1	27	0

Of the 27 water bodies, just one has 'good' ecological status, falling far short of the WFD target of 100%. The percentage of waterbodies achieving 'moderate' status was 59.3%, whilst 37.0% were 'poor' or 'bad' status. All water bodies failed based on their chemical status.

The Lee (Tottenham Locks to Bow Locks/Three Mills Locks) Water Body is the only water body in the operational catchment achieving 'bad' ecological status. It is also 'high' for all specific pollutants, including Arsenic (As) and Copper (Cu).

The reasons for not achieving good (RNAG) is predominantly due to urban development associated with urban and transport, sewage discharge by the water industry, use of restricted substance by navigation, and misconnections by the domestic general public.

The WFD also includes groundwater water bodies, with the objective of achieving 'good' quantitative and chemical status. The borough contains one such groundwater body, Greenwich Tertiaries and Chalk, which currently has 'poor' chemical and quantitative classification.

The Thames River Basin Management Plan (2021-2027)¹⁵⁴, developed in 2009 and updated in 2022, is required if 93.6% of surface waters in England are to achieve ‘good or better’ ecological status by 2027 or beyond¹⁵⁵.

National flood zone data correlates with the location of main rivers and ordinary watercourses as areas with the greatest risk of flooding. The government’s flood map¹⁵⁶ for planning shows that a sustainable portion of the borough lies within in flood risk zone 3, meaning it has a high probability of flooding. The borough has almost 37,000 properties located within areas defined as being at risk of flooding, with the potential risk of flooding from other (non-river related) sources including sewer surcharge and surface water flooding as a result of heavy rainfall prevalent. Areas of the borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate other sources of flood risk¹⁵⁷.

The LBTH Local Flood Risk Management Strategy¹⁵⁸ identifies critical drainage areas (CDAs) that are predicted to be at an increased risk of flooding relative to the rest of the borough. Due to large parts of the borough being urbanised and well developed, and the limited capacity of the sewer system, surface water flooding is thought to pose the most significant risk. The Isle of Dogs is one area of high-level flood risk as a result of its low-lying topography.

Future Trends and evolution of the baseline without the NLP

In terms of water quality, the requirements of the WFD should lead to continued improvements to water quality in watercourses. However, water quality is also likely to continue to be affected by pollution incidents in the area; runoff from urban and transport; the presence of non-native species; and physical modifications to water bodies.

Meeting water supply demand over the next 25 years will be challenging in London. Deficits may develop across England by the 2050s due to climate change alone; these would be exacerbated by population growth.

At a regional level, the future implications of climate change projections include increased surface water and fluvial flooding leading to damage to property and disruption to economic

¹⁵⁴ Environment Agency (2022) Thames river basin district river basin management plan: updated 2022. Available at: <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022>

¹⁵⁵ Environment Agency (2022) River basin management plans updated 2022: progress report. Available at: <https://www.gov.uk/government/publications/river-basin-management-plans-updated-2022-progress-report/river-basin-management-plans-updated-2022-progress-report>

¹⁵⁶ Environment Agency, Flood Map for Planning. Available at: <https://flood-map-for-planning.service.gov.uk/>

¹⁵⁷ Environment Agency and Tower Hamlets Borough Resilience Forum (2017) London Borough of Tower Hamlets: Multi-Agency Flood Plan v1.0. Available at: [LBTH_MAFP_Sept_17 \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk/Documents/Environmental-protection/Monitoring/Local_Flood_Risk_Management_Strategy.pdf)

¹⁵⁸ Tower Hamlets Council (2017) Local Flood Risk Management Strategy: London Borough Tower Hamlets 2016-2022. Available at: https://www.towerhamlets.gov.uk/Documents/Environmental-protection/Monitoring/Local_Flood_Risk_Management_Strategy.pdf

activity; water shortages; and higher incidence of damage to transportation, utilities, property and communications infrastructure caused by an increase in the number of extreme weather events (e.g., heat, high winds, and flooding). It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within the borough.

A NLP presents opportunities to provide a targeted approach to addressing flood risk and water quality issues. It could support sustainable urban drainage systems (SUDs) and GI requirements within new developments in order to adapt to climate change and counteract flood risk.

Issues and Opportunities

Issues and opportunities for the water environment and the implications for the NLP have been identified in **Table D-13**.

Table D-13 – Issues and Opportunities for the Water Environment

Key Risks/Opportunities	Implications for the NLP
<p>Water quality</p> <ul style="list-style-type: none"> ■ The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat; ■ Of the 27 waterbodies in the borough, just 3.7% are achieving ‘good’ status, falling far short of the WFD target; and ■ Upgrading existing infrastructure provides the opportunity to improve pollution control. <p>Flood risk</p> <ul style="list-style-type: none"> ■ Increased development near a watercourse (including transport, housing and other infrastructure) can increase flood risk on a local and catchment scale; ■ Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the 	<p>Water quality</p> <ul style="list-style-type: none"> ■ The NLP should promote that development in close proximity to a watercourse should include the addition of naturalised features to buffer zones to connect the river to the riparian zone, create natural flood management (NFM) schemes, and promote biodiversity. ■ The NLP should seek to protect groundwater quality as a water resource. <p>Flood risk</p> <ul style="list-style-type: none"> ■ The NLP should undertake a new Strategic Flood Risk Assessment (SFRA) and Flood Risk Management Strategy to address new challenges and mitigate against risk of flooding in the borough. These can also provide an evidence base to support the NLP.

Key Risks/Opportunities	Implications for the NLP
<p>already stressed capacity of sewer systems; and</p> <ul style="list-style-type: none"> ■ Climate change is likely to increase the occurrence of flooding from all sources and hence raise the flood risk in LBTH, in addition to existing residual flood risk in the event of a breach or failure of the flood defences. 	<ul style="list-style-type: none"> ■ The NLP should ensure that development in close proximity to a watercourse should include provision of natural, undeveloped buffer zones. These can help contribute to natural flood management (NFM) whilst also allowing access for maintenance and emergency works. ■ The NLP should seek to incorporate sustainable urban drainage systems (SUDs) and GI requirements within new developments in order to adapt to climate change and counteract flood risk. GI can also reduce surface water runoff and have water quality co-benefits. ■ The NLP should critically assess the resilience of Thames flood defences to sea level rise under different climate scenarios. The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames.

Air Quality

Summary of Current Baseline

Air quality plays an important role in human health. Poor air quality can have large impacts on health through short term exposure, but particularly through long term exposure. According to the World Health Organisation (WHO), air quality is one of the greatest environmental risks to human health. Reducing air pollution can result in reductions in stroke, heart disease, lung cancer, and both chronic and acute respiratory diseases,

including asthma¹⁵⁹. In 2019, 99% of the world's population were living in places where the WHO air quality guidelines were not met, and that ambient air pollution caused 4.2 million premature deaths worldwide in that year. Major pollutants include nitrous oxide (NO_x), nitrogen dioxide (NO₂) and particulate matter (PM).

Poor air quality also contributes to the deterioration of ecological receptors. Ecosystems are negatively impacted by air pollution, particularly emissions such as sulphur and nitrogen, as it affects their ability to function and grow¹⁶⁰.

LBTH has higher levels of air pollution compared to the UK overall¹⁶¹. The average annual mean for nitrogen dioxide in the majority of the borough is 21 – 30 µg m⁻³. In some parts of the borough the average annual mean is 41 – 50 µg m⁻³, exceeding the UK air quality objective (AQO)¹⁶² of 40 µg m⁻³. The average annual mean for nitrogen oxides are between 31 – 40 µg m⁻³ and 41 – 60 µg m⁻³, exceeding the UK AQO of 30 µg m⁻³. The borough does not exceed the AQO for either PM₁₀ or PM_{2.5}.

Local authorities must declare areas that are not likely to achieve national air quality objectives as Air Quality Management Areas (AQMAs). The whole borough sits within the Tower Hamlets AQMA which was designated in 2000 for PM₁₀ (24-Hour Mean) and NO₂ (Annual Mean)¹⁶³. The source of pollution is transport and industry.

The borough is situated within the London Ultra Low Emission Zone (ULEZ) which operates 24 hours a day, every day of the year, except Christmas Day (25 December). The high levels of pollutants in the borough are of particular concern due to their impacts on human health, especially as in 2019 it was estimated that between 88 and 97 deaths were attributable to human made NO₂ and PM_{2.5} air pollution exposure¹⁶⁴. LBTH's Air Quality Action Plan (AQAP) 2022-2027¹⁶⁵ is being implemented to address ongoing poor air quality throughout the borough.

¹⁵⁹ WHO (2022) Ambient (outdoor) air pollution. Available at: [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

¹⁶⁰ UNECE. Air Pollution, Ecosystems and Biodiversity, [online] Available at: [Air pollution, ecosystems and biodiversity | UNECE](#)

¹⁶¹ Defra. UK Air Information Resource. UK Ambient Air Quality Interactive Map. Available at: <https://uk-air.defra.gov.uk/data/gis-mapping/>

¹⁶² Defra. UK Air Information Resource. UK Air Quality Limits. Available at: <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits>

¹⁶³ Defra. UK Air Information Resource. AQMA Details. Available at: https://uk-air.defra.gov.uk/aqma/details?aqma_ref=141

¹⁶⁴ Imperial College London. London Health Burden of Current Air Pollution and Future Health Benefits of Mayoral Air Quality Policies. Available at: http://erg.ic.ac.uk/research/home/resources/ERG_ImperialCollegeLondon_HIA_AQ_LDN_11012021.pdf

¹⁶⁵ Tower Hamlets Council. London Borough of Tower Hamlets: Air Quality Action Plan 2022 – 2027. Available at: https://www.towerhamlets.gov.uk/ignl/environment_and_waste/environmental_health/pollution/air_quality/Breathe_Clean/Air-Quality-Action-Plan.aspx

The Borough Air Quality Compendium report (2022)¹⁶⁶ summarises the Annual Status Reports (ASRs) submitted by the London boroughs in 2021 from monitoring data in 2020. LBTH showed a drop from twenty-one locations exceeding NO₂ concentrations in 2019 to just one location post distance correction in 2020. The borough is also demonstrating improvement with regards to emissions from developments and buildings, adopting Air Quality Neutral policies, checking compliance at planning application stage for every major development proposal, and 100% of schemes in 2020 having suitable energy efficiency measures installed to reduce the demand for onsite heat generation.

Future Trends and evolution of the baseline without the NLP

The UK Clean Air Strategy outlines plans to reduce emission of pollutants and improve air quality by the year 2030¹⁶⁷. This will include reductions in public exposure to particulate matter, ammonia, nitrogen oxides, sulphur dioxide, and non-methane volatile organic compounds. However, the 29% increase in road traffic from 1990 and 2018 and 6% increase in GHG emission from 1990 to 2017 is likely to continue.

Additionally, as LBTH is part of the London urban area, it is likely that increases in population and urbanisation will contribute to increased air pollution. More severe and frequent heat episodes (associated with the changing climate) can also worsen air quality and therefore asthma, respiratory diseases and allergic reactions, without further intervention.

A ban on new petrol and diesel vehicle sales in the UK by 2030 is expected to further reduce NO_x emissions. This will improve air quality, particularly across urban areas, and further the improvements to emissions reductions. Electric and hybrid vehicles are expected to become dominant (with the ban on hybrid vehicle sales in the UK by 2035).

The UK wide ban on the new petrol and diesel vehicle sales by 2030 is expected to lead to a reduction in emissions from vehicles¹⁶⁸. This will improve air quality in urban areas, which will have a positive impact on health problems associated with air pollution. Because the AQMA in the borough is associated with vehicle emissions, the transition to electric vehicles has the potential to bring air pollution to acceptable levels.

¹⁶⁶ Greater London Authority (2022) Local Authorities and Air Quality: A summary of action taken by London boroughs to improve air quality in 2020. Available at:

https://www.london.gov.uk/sites/default/files/gla_compendium_report_final_jan_2022.pdf

¹⁶⁷ Defra. (2019). Clean Air Strategy. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

¹⁶⁸ HM Government (2020). Available online at: <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

Overall, increases in population and urbanisation have the possibility to degrade air quality, while higher standards for air pollutants and vehicle emissions have the potential to improve air quality. These opposing trends may balance each other out in future.

Without the NLP development could be located in areas that are not well served by community facilities, services and jobs thereby increasing traffic movements and further impacting upon the borough’s air quality.

Issues and Opportunities

Issues and opportunities for air quality and the implications for the NLP have been identified in **Table D-14**.

Table D-14 – Issues and Opportunities for Air Quality

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation; ■ More severe and frequent heat episodes as a result of climate change can contribute to the worsening of air quality; ■ Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases; ■ The UK Government’s plan to end the sale of all new conventional petrol and diesel cars and vans by 2030 and support for work and home-based electric charging facilities, will promote use of hybrid and electric vehicles, with positive effects for air quality; and ■ Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality. 	<ul style="list-style-type: none"> ■ The NLP must consider the implications of Government plans, facilitating the transition to electric vehicles. ■ Consideration should be given to methods of modal shift to sustainable transport modes (public transport and active transport) active, to aid in reducing emissions. ■ The NLP should aim to improve congested areas of LBTH, minimising excess emissions where possible and aiding in improving air quality. ■ The NLP could consider living wall systems in the borough for associated air quality, biodiversity, and visual amenity benefits in highly urbanised areas.

Climate Change and Greenhouse Gases

Summary of Current Baseline

In 2021, an estimated 26% of greenhouse gas emissions (GHGs) in the UK were from the transport sector, 20% energy supply, 18% business and 16% residential, with carbon dioxide (CO₂) being the most prominent gas from these sectors¹⁶⁹. In 2021, transport accounted for 109.5 MtCO₂e of GHG emissions, which represents a 10% increase from 2020, but an 11% decrease compared with 2019 figures. The impact of the pandemic in 2020 caused transport emissions to fall, attributable to lockdown measures introduced.

In 2020, a total of 1,020.4 ktCO₂e emissions¹⁷⁰ were generated by LBTH, with the greatest number of emissions arising from commercial uses (33.9%), followed by transport (25.9%), and domestic uses (20.9%). The percentage change of emissions per km² from 2005 to 2019 is -43% for the borough, better than the national average reduction of -36% for the same period. **Table D-15** shows the breakdown of emissions generated by the highest emission sectors in LBTH compared to regional and national averages.

¹⁶⁹ Defra (2023) 2021 UK Greenhouse Gas Emissions, Final Figures. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1134664/greenhouse-gas-emissions-statistical-release-2021.pdf

¹⁷⁰ Department for Business, Energy & Industrial Strategy (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020>

Table D-15 – Carbon Emissions¹⁷⁰

	Total Emissions (ktCO₂e)	Commercial Emissions (%)	Transport Emissions (%)	Domestic Emissions (%)
Tower Hamlets	1,081.2	33.9	25.9	20.9
London	28,369.3	36.2	28.5	36.2
England	291,134.6	7.0	30.7	26.3

In 2019, the average per capita emissions across LBTH are 3.6 tonnes of CO₂ emissions per person, which is slightly higher than the regional of 3.2 tonnes per person but significantly lower than the national average of 8.9 tonnes per person¹⁷⁰.

During the most recent decade (2009-2018) the UK has been on average 0.3°C warmer than the 1981-2010 average and 0.9°C warmer than 1961-1990. All of the top ten warmest years have occurred since 2002. In the past few decades there has been an increase in annual average rainfall over the UK, for which the most recent decade (2009-2018) has been on average 5% wetter than 1961-1990 and 1% wetter than 1981-2010¹⁷¹.

LBTH has a relatively high climate risk according to The London Climate Risk Maps¹⁷², which measures overall risk using 13 metrics, which are as follows:

- Ages Under 5;
- Ages Over 75;
- English Proficiency;
- Income Deprivation;
- Social Renters;
- BAME;
- Average Land Surface Temperature;

¹⁷¹ Met Office (2022) UK Climate Projections: Headline Findings. Available at: https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18_headline_findings_v4_aug22.pdf

¹⁷² Bloomberg Associates (2022) Climate Risk Mapping. Available at: <https://data.london.gov.uk/dataset/climate-risk-mapping>

- Surface Water Flood Risk;
- PM_{2.5};
- NO₂;
- Green/Blue Land Cover; and
- Areas of Deficiency in Access to Public Open Space.

Areas including Wapping, Shadwell, Bethnal Green, Bow and Poplar have the highest climate risk, traversing west to east of the borough. Limehouse, Blackwall and Isle of Dogs have the lowest climate risk, and subsequently a lower heat risk. Urban heat island (UHI) is the phenomenon where temperatures are relatively higher in cities compared to surrounding rural areas. UHI up to 8°C have been felt in UK cities, whilst cities the size of London has experienced temperatures in the order of 10°C, and concern for excess urban heat are increasing¹⁷³.

Future Trends and evolution of the baseline without the NLP

The UK is committed to legally binding GHG emissions reduction targets of 80% by 2050, compared to 1990 levels, as set out in the Climate Change Act 2008¹⁷⁴. The UK ratified the 2015 Paris Agreement, which set out a GHG emission reduction target of at least 40% by 2030, compared to 1990 with a long-term strategy for net zero emissions by 2050¹⁷⁵. However, a more ambitious target was set by the UK in 2020 to reduce greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels¹⁷⁶. Currently there is widespread criticism as to whether the UK is on track to meet these ambitions.

Working towards these targets means changes to technology as well as ways in which people travel. For example, prior to the 26th Conference of the Parties (COP26) Summit in 2021, the UK brought forward its ban on the selling of new petrol, diesel, or hybrid cars from 2040 to 2030. The last decade has seen a remarkable surge in demand for electric vehicles in the UK.

The number of licensed ultra-low emission vehicles (ULEVs) in the UK has increased by 3,427% between the end of March 2010 to the end of June 2020, a jump from just under 9,000 ULEVs to 317,000 ULEVs¹⁷⁷.

¹⁷³ Royal Meteorological Society (2017) Urban Heat Islands. Available at: [Urban Heat Islands | Royal Meteorological Society \(rmets.org\)](#)

¹⁷⁴ Climate Change Act 2008, Available online at: <https://www.legislation.gov.uk/ukpga/2008/27/contents>

¹⁷⁵ Paris Agreement, Available online at: https://ec.europa.eu/clima/policies/international/negotiations/paris_e

¹⁷⁶ Department for Business, Energy and Industrial Strategy, Press Release: UK Sets Ambitious New Climate Target Ahead of UN Summit, 2020, Available online at: <https://www.gov.uk/government/news/uk-sets-ambitious-newclimate-target-ahead-of-un-summit>

¹⁷⁷ House of Commons (2020) Briefing Paper: Electric Vehicles and Infrastructure. Available at: <https://researchbriefings.files.parliament.uk/documents/CBP-7480/CBP-7480.pdf>

Since the 27th Conference of the Parties (COP27) Summit in 2022, the UK has pledged to triple its contributions to adaptation finance by 2025¹⁷⁸, in recognition of the existential threat climate change is posing globally. The next UN climate summit, COP28, held in November/December 2023, is set to take stock of its progress on the Paris Agreement through the first Global Stocktake (GST)¹⁷⁹.

The Mayor of LBTH declared a climate emergency in 2019 and set an ambitious target for the council to become net zero by 2025, and the borough net zero by 2045. The London Borough of Tower Hamlets Net Zero Carbon Plan document sets out the strategic vision on how this is going to be achieved¹³⁰. The plan details actions recommended for Power, Buildings, Transport, Waste, Forestry and land use, Industry, Aviation, and F-gases.

By the end of the 21st century, all areas of the UK are projected to be warmer, more so in summer than in winter. This projected temperature rise in the UK is consistent with future warming globally. Rainfall patterns across the UK are not uniform and vary on seasonal and regional scales and will continue to vary in the future, with significant increases in hourly precipitation extremes⁴. Both temperature and rainfall changes will be much larger if greenhouse gas emissions continue to increase.

Despite this, the current estimate for temperature increases and changes to rainfall patterns are unlikely to alter significantly in the near future, given the timescales associated with climate change. This being the case, there will be an increasing need to implement climate change mitigation and adaptation measures in light of changing environmental conditions.

A new NLP would allow for better designed developments and buildings which are more resilient to the effects of climate change, reduce GHGs construction and operation (including embodied carbon). It will likely support developments that would also likely be more accessible, particularly by sustainable transport, which in turn will aid the borough in reducing the amount of greenhouse gases it produces.

¹⁷⁸ House of Commons (2023) What was agreed at COP27? Available at: <https://commonslibrary.parliament.uk/what-was-agreed-at-cop27/>

¹⁷⁹ COP28 UAE | United Nations Climate Change Conference (UNFCCC)

Issues and Opportunities

Issues and opportunities for climate change and greenhouse gases and the implications for the NLP have been identified in **Table D-16**.

Table D-16 – Issues and Opportunities for Climate Change and Greenhouse Gases

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ Transport is the largest contributor to GHG emissions in the UK. In LBTH, the largest contributor is from commercial uses; ■ Higher than average fuel poverty rates may continue to be a significant issue in the borough; ■ Since the Covid-19 pandemic, private car use has increased which contributes to GHG emissions; ■ The impacts of the Urban Heat Island (UHI) generated in London will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households; ■ There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH; and ■ There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit. 	<ul style="list-style-type: none"> ■ There is a need to plan for and implement/facilitate climate change adaptation, in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding. The Thames Estuary 2100 Plan has requirements to raise flood defences in line with sea level rises across the Thames. ■ There is a need to support the continued increase in charging infrastructure to support the demand in electric cars, as well as the modal shift to more sustainable transport. ■ The NLP should promote the implementation of Nature-based solutions (NbS) to build resilience to facilitate climate change adaptation, whilst providing a feasible method to sequester and store carbon in line with net zero ambitions. ■ There is need for low carbon buildings and energy to support LBTH’s commitment to reach net-zero, to reduce ‘embodied’ and ‘operational’ carbon. ■ The NLP should address the demand for on-site renewable energy to reduce national grid dependency. ■ The NLP should promote actions to ensure appropriate habitat is created that will be of importance to habitat connectivity and creating resilient

Key Risks/Opportunities	Implications for the NLP
	<p>functioning ecosystems, to allow wildlife to adapt to climate change.</p> <ul style="list-style-type: none"> ■ The NLP should set a target for the percentage of wild cover within green spaces to help prevent further biodiversity decline.

Material Assets (including Soil Resources)

Summary of Current Baseline

Geology and Soils

Government policy promotes development on previously developed land (brownfield land) rather than on greenfield land, to make the most efficient use of a finite resource. The borough’s land is predominantly in urban use¹⁸⁰.

Southern and eastern England is underlain by a Principal Aquifer, ‘the Chalk’, which usually provides a high level of water storage as a result of its well-developed network of fractures. It may support water supply and/or river base flow on a strategic scale, however these are prone to diffuse pollution¹⁸¹. Parts of the borough are underlain by Secondary Aquifers.

The bedrock geology within the borough is predominantly sedimentary bedrock of clay, silt and sand, overlain with superficial deposits sedimentary in origin, deposited in the Quaternary period¹⁸². The Taplow and Kempton Park Gravels in the borough are classified as Secondary A aquifers and are therefore protected superficial deposits. Gilbert’s Pit (Charlton) SSSI in Greenwich is in closest proximity to LBTH, designated for its geological importance.

London is the world’s biggest centre for investment in the minerals industry, with most of the world’s biggest mining companies listed on the London Stock Exchange¹⁸³. London itself

¹⁸⁰ Natural England (2010) Agricultural Land Classification map London and the South East (ALC007) Available at: <https://publications.naturalengland.org.uk/publication/141047>

¹⁸¹ British Geological Survey, The Chalk. Available at: <https://www2.bgs.ac.uk/groundwater/shaleGas/aquifersAndShales/maps/aquifers/Chalk.html>

¹⁸² British Geological Survey, Geology Viewer. Available at: https://geologyviewer.bgs.ac.uk/?_ga=2.40981476.739853416.1672832649-1352688571.1672832649

¹⁸³ London Stock Exchange. Available at: <https://www.londonstockexchange.com/>

has extensive history of mining and quarrying, specifically, chalk mines with associated flint deposits. Recorded extraction sites in LBTH include¹⁸⁴:

- Bow Rail Depot
- St Thomas Mill Brick Field
- Orchard Wharf

Soil sealing refers to the covering of the ground by an impermeable material and is one of the main causes of soil degradation. Over a third of the borough's surface area is covered by sealed surfaces, such as buildings, roads and car parks³⁹. This can have an impact on surface water flooding which is already a prevalent issue in the borough.

Local authorities have a duty to identify contaminated land under Section 78B of the Environmental Protection Act 1990¹⁸⁵. The borough has a legacy of land contamination as a result of widespread past industrial activity, particularly around the former docks¹⁸⁶. This is important to consider for the development of brownfield sites, as proper remediation will be required to enable development to take place, and remediation should seek to protect and improve both groundwater and land quality.

Energy

The commitment of the LBTH to become net zero by 2025, and LBTH net zero by 2045 will require commitments to increasing the supply of renewable energy within the borough. The Mayor of London has set a target to supply 15% of London's overall energy from renewable, local sources by 2030¹⁸⁷. This is in line with the growth of renewables demand and increased production in the UK¹⁸⁸.

The borough produces approximately 5.9MW installed capacity from just photovoltaics, performing in the lower half of London boroughs¹⁸⁹. Throughout the borough, the following renewable energies are currently utilised (2021), with their approximate energy productions:

- Solar photovoltaic (PV) – 692 systems installed, generating 4,449MWh of renewable electricity

¹⁸⁴ British Geological Survey, GeoIndex. Available at: <https://www.bgs.ac.uk/map-viewers/geoindex-onshore/>

¹⁸⁵ Legislation.gov.uk (1990) Environmental Protection Act 1990. Part IIA Contaminated Land. Available at:

<https://www.legislation.gov.uk/ukpga/1990/43/part/IIA>

¹⁸⁶ Tower Hamlets Council (2022) Strategy for the Identification of Contaminated Land. Available at: [Strategy-for-the-identification-of-contaminated-land.docx \(live.com\)](#)

¹⁸⁷ London Assembly (2022) London's renewable energy future. Available at: <https://www.london.gov.uk/press-releases/assembly/londons-renewable-energy-future>

¹⁸⁸ Gov.uk (2019) Extractive industries in the UK. Available at: <https://www.gov.uk/government/publications/extractive-industries-transparency-initiative-payments-report-2018/extractive-industries-in-the-uk>

¹⁸⁹ Defra (2022) Regional Renewable Statistics. Available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>

- Onshore wind – 1 installation, no data on approximate energy production

LBTH is supporting the council commitment to become net zero by further investing into renewable energy generation by installing photovoltaics onto council offices and leisure centres, also aiding households through a separate fund¹⁹⁰.

Waste

The UK generated 222 million tonnes of waste in 2018¹⁹¹. In LBTH, a total of 113,059 tonnes of waste was collected from the kerbside in 2017/18¹⁹². Household waste recycling rates in the borough have decreased between 2017/18 (26%) and 2020/21 (19%) by -7%, compared to the rates for London and England which have mainly remained unchanged across this period¹⁹³. The rates in the borough are also significantly lower than the 2020/21 average rates for both London (33%) and England (42%). In 2019/20, LBTH was the fourth-worst local authority for recycling in the whole of the UK. Since 2011/2012, all residual waste produced in the borough has been diverted from going directly to landfill to energy recovery¹⁹⁴. The energy from waste (EfW) facility is located in Belvedere in the London Borough of Bexley and has an annual capacity of 585,000t with a 66MW output¹⁹⁵. This process is estimated to save 170,000t of carbon by not sending waste to landfill¹⁹⁶.

Future Trends and evolution of the baseline without the NLP

In order for the borough to reach net zero by their respective target dates of 2025 and 2045, the increase of renewable energy supply will be pivotal. Shifting dependency away from non-renewable sources is crucial to meet such ambitions. The projected population increase in the borough will increase energy needs and renewables will be required to meet this demand.

The limitations of space for constructing renewable energy will be challenging as all new buildings must have ultra-low levels of total energy use, however, the NLP present opportunities to incorporate renewable energy as part of the design of new developments.

¹⁹⁰ Tower Hamlets Council, A Cleaner and Greener Future for Tower Hamlets. Available at: <https://www.towerhamlets.gov.uk/Documents/Climate/Cleaner-Greener-Leaflet.pdf>

¹⁹¹ Defra (2022) UK statistics on waste. Available at: <https://www.gov.uk/government/statistics/uk-waste-data/uk-statistics-on-waste#total-waste-generation-and-final-treatment-of-all-waste>

¹⁹² Tower Hamlets Council, Waste management strategy 2018-30. Available at: https://democracy.towerhamlets.gov.uk/documents/s143602/6.4a%20Appendix%201%20-%20WasteStrategy_final.pdf

¹⁹³ Defra, Household Waste Recycling Rates, Borough. Available at: [Household Waste Recycling Rates, Borough – London Datastore](#)

¹⁹⁴ Tower Hamlets Council, Draft Waste Management Strategy 2018-2030. Available at: <https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=128934>

¹⁹⁵ Power Technology (2011) The Riverside Resource Recovery Facility Project, UK. Available at: <https://www.power-technology.com/projects/riverside/>

¹⁹⁶ Cory Group (2021) Sustainability Report 2021. Available at: https://www.corygroup.co.uk/application/files/7216/6066/0318/Cory_Sustainability_Report_2021.pdf

The growing population and associated need for development are also likely to increase the use of mineral resources and waste generation. As such, it will be necessary to apply resource efficiency and waste management measures, including the re-use and recycling of materials.

The absence of the NLP could make it difficult for LBTH to properly plan for the amount of waste it will be expected to manage in the future. It may also compromise the boroughs’ ability to plan for the amount of building material it needs to import in order to achieve its growth goals.

Issues and Opportunities

Issues and opportunities for material assets and the implications for the NLP have been identified in **Table D-17**.

Table D-17 – Issues and Opportunities for Material Assets

Key Risks/Opportunities	Implications for the NLP
<ul style="list-style-type: none"> ■ The growing population and associated need for development is likely to increase the use of mineral resources and waste generation. This is highly important considering the Belvedere EfW facility processes waste from across London; ■ Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population; and ■ There is a continued increase in renewable energy supplies across the borough, of which needs to be managed efficiently to ensure the capacity requirements of this transition are met. 	<ul style="list-style-type: none"> ■ The NLP should promote actions to protect natural resources, buildings and infrastructure from the impacts of climate change. ■ The NLP should protect and conserve the borough’s best and most versatile land from development where possible and utilise areas with capacity for growth. ■ The NLP should explore innovative ways to manage waste and align principles to support a circular economy when possible. ■ The NLP should maximise onsite renewable energy efficiency by making use of vertical solar panels and maximise space by seeking wind solutions through roof-mounted turbines.

Appendix E

Review of Plans, Policies and Programmes



Table E-1 – Relevant Plans, Policies, strategies and Programmes - Population and Equalities

Document	Key Messages/ Issues
The Equality Act, 2010	<p>The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It is against the law to discriminate against anyone because of:</p> <ul style="list-style-type: none"> ▪ Age; ▪ Being or becoming a transsexual person; ▪ Being married or in a civil partnership; ▪ Being pregnant or having a child; ▪ Disability; ▪ Race including colour, nationality, ethnic or national origin; ▪ Religion, belief or lack of religion/belief; ▪ Sex; and ▪ Sexual orientation.
National Planning Policy Framework (NPPF), 2023	<p>When delivering new schemes, applicants must avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the UK Government’s planning guidance. Applicants should provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes.</p>
Department for Transport, Transport for Everyone: an action plan to promote equality, 2012	<p>The Action Plan sets what the UK Government is doing to ensure people from all communities in society have the option to use public transport.</p> <p>The main aim of the report is to <i>‘deliver better access to jobs and key services through an accessible and socially inclusive transport system, by removing the barriers to travel and</i></p>

Document	Key Messages/ Issues
	<i>ensuring that social impacts are addressed in policy development and service delivery’.</i>
Strong and Prosperous Communities: The Local Government White Paper, 2006	Deliver better public services through involving and consulting users more fully, providing better information about local standards and managing services at neighbourhood level.
Foresight Mental Capital and Wellbeing Project (2008). Final Project report. The Government Office for Science	As the number of older adults increases substantially in the UK over the next six decades, the existing urban and rural infrastructure will need to be adapted so that the needs of these people are met. For example, issues of access, transport, amenity and security will substantially affect the wellbeing of older people.
Addressing Transport Barriers to work in Low Income Neighbourhoods, Sheffield Hallam University, 2017	<p>Transport is a key factor shaping experiences of poverty. The ability of households in poverty to find paid work often depends on access to affordable, regular and reliable transport.</p> <p>Residents of low-income neighbourhoods generally have a significant reliance on bus services. This can create issues regarding variable frequency, timing, reliability and range of places served.</p> <p>There is considerable evidence that transport issues affect different groups to varying extents and in particular ways, especially in terms of gender.</p> <p>A distinguishing feature of low-income neighbourhoods is the relatively low incidence of motor vehicle ownership. This means that residents have a much higher reliance on public transport than those living in middle and high-income areas.</p>

Document	Key Messages/ Issues
	Difficulties in meeting the costs of transport from current incomes have given rise to the concept of 'transport poverty'.
Build Back Fairer: The Covid-19 Marmot Review, 2020	<p>The Marmot Review identified that the levels of social, environmental and economic inequality in society are damaging health and well-being. This report identifies that as the UK emerges from the pandemic it would be a mistake to attempt to re-establish the status quo that existed before the pandemic.</p> <p>The reductions in car traffic during the pandemic resulted in cleaner air and reduction in emission of greenhouse gases. Walking and cycling as modes of transport became both necessary and desirable. As the pandemic is brought under control and public transport again becomes safe, a future for our cities based on reduction in vehicle traffic and made safe for walking and cycling in addition to public transport is a future we can both imagine and realise.</p> <p>Building Back Fairer requires a sizeable reduction in private car use and greater active travel and use of public transport. Efforts to support this are required urgently and would help to reduce Greenhouse Gas Emissions and lead to a more sustainable environment.</p>
<i>Regional</i>	
Mayor of London, Social Infrastructure: Supplementary Planning Guidance (SPG), 2015	Population growth in London means that it is important to ensure that new development, particularly in Opportunity and Intensification Areas, Areas for Regeneration, and large residential development is supported by necessary social

Document	Key Messages/ Issues
	<p>infrastructure. This is important not only for the quality of life for residents in new developments, but also the quality of life for the existing population, who should not see a reduction in the quality of their services, their health and wellbeing or their experience of living in London.</p> <p>This SPG provides guidance for:</p> <ul style="list-style-type: none"> ■ Borough planners and public health practitioners in gathering information about places as part of the evidence base for policies in their local plans and in assessing planning applications. ■ Developers and their consultants in preparing planning applications in order to ensure that schemes respond to social infrastructure requirements, enabling them to recognise the role of social infrastructure provision in place making and its potential as a driver of value in development projects. ■ Community groups and Neighbourhood Forums in understanding the requirements for social infrastructure in their areas to inform the preparation of Neighbourhood Plans. ■ Local authority Directors of Public Health to shape and inform their role around planning and social infrastructure-linked to their responsibility for all of their local authority’s duties to take steps to improve the health of the people in its area.
<p>Mayor of London, The London Plan 2021. Chapter 5: Social Infrastructure</p>	<p>The London Plan (2021) is London’s Spatial Development Strategy (SDS). It sets out an integrated economic,</p>

Document	Key Messages/ Issues
	<p>environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 5: Social Infrastructure includes:</p> <ul style="list-style-type: none"> ▪ Policy S1 Developing London’s social infrastructure ▪ Policy S2 Health and social care facilities ▪ Policy S3 Education and childcare facilities ▪ Policy S4 Play and informal recreation ▪ Policy S5 Sports and recreation facilities ▪ Policy S6 Public toilets ▪ Policy S7 Burial space
<i>Local</i>	
Tower Hamlets Council, Tower Hamlets Equality policy	<p>The equality policy sets out a clear commitment to ensure equality is at the heart of everything the council does; from money spent and the people employed, to the services provided. The council is committed to creating cohesive communities that are strong, fair and inclusive.</p>

Table E-2 – Relevant Plans, Policies, strategies and Programmes - Human Health

Document	Key Messages/ Issues
<i>National</i>	
<p>Fair Society, Healthy Lives: The Marmot Review: Strategic review of health inequalities in England post, 2012</p>	<p>Reducing health inequalities is a matter of fairness and social justice. In England, the many people who are currently dying prematurely each year as a result of health inequalities would otherwise have enjoyed, in total, between 1.3 and 2.5 million extra years of life.</p> <p>Ensure a healthy standard of living for all; Create and develop healthy and sustainable places and communities; and strengthen the role and impact of ill health prevention.</p>
<p>Build Back Fairer: The Covid-19 Marmot Review, 2020</p>	<p>The Marmot Review identified that the levels of social, environmental and economic inequality in society are damaging health and well-being. This report identifies that as the UK emerges from the pandemic it would be a mistake to attempt to re-establish the status quo that existed before the pandemic.</p> <p>The reductions in car traffic during the pandemic resulted in cleaner air and reduction in emission of greenhouse gases. Walking and cycling as modes of transport became both necessary and desirable. As the pandemic is brought under control and public transport again becomes safe, a future for our cities based on reduction in vehicle traffic and made safe for walking and cycling in addition to public transport is a future we can both imagine and realise.</p> <p>Building Back Fairer requires a sizeable reduction in private car use and greater active travel and use of public transport. Efforts</p>

Document	Key Messages/ Issues
	to support this are required urgently and would help to reduce Greenhouse Gas Emissions and lead to a more sustainable environment.
NPPF, 2021	<p>Paragraph 92 of the NPPF states:</p> <p><i>'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</i></p> <p><i>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</i></p> <p><i>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and</i></p> <p><i>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'</i></p>
Chartered Institution of Highways and Transportation (CIHT), Better planning, better transport, better places, 2019	Poorly located and designed new development seriously hinders healthy lifestyles. Physical inactivity directly contributes to one in six deaths in the UK, drives rising levels of obesity, and is the

Document	Key Messages/ Issues
	<p>fourth largest cause of disease and disability. It costs society an estimated £7.4 billion a year and places the national healthcare system under increasing financial strain.</p> <p>By enabling compact, higher density, and mixed-use patterns of development. This encourages more people to incorporate physical activity into their daily journeys, improving productivity and dramatically reducing ill health.</p>
<p>Transport, health, and wellbeing: An evidence review for the Department for Transport, 2019</p>	<p>There are three main mechanisms that link transport and health and wellbeing:</p> <ul style="list-style-type: none"> ■ Transport and access: Transport plays a key role in improving access to health services, particularly for vulnerable groups like older people. ■ Mode of transport: Mode of transport affects physical and mental health, via mechanisms including physical activity and commuting time. ■ Wider effects of transport and infrastructure: Transport can facilitate social interactions and promote social inclusion.
<p>Public Health England, Health Matters, Physical Activity: Prevention and management of long-term conditions</p>	<p>Regular physical activity provides a range of physical and mental health and social benefits, including:</p> <ul style="list-style-type: none"> ■ Reducing the risk of many long-term conditions ■ Helping manage existing conditions ■ Ensuring good musculoskeletal health ■ Developing and maintaining physical and mental function and independence ■ Supporting social inclusion ■ Helping maintain a healthy weight ■ Reducing inequalities for people with long-term conditions

Document	Key Messages/ Issues
	<p>The UK Chief Medical Officers (CMOs’) Physical Activity Guidelines state that for good physical and mental health, adults should aim to be physically active every day. Any activity is better than none, and more is better still.</p> <p>Regular physical activity can help to prevent and manage a range of chronic conditions and diseases, many of which are on the rise and affecting people at an earlier age.</p>
<i>Regional</i>	
<p>Mayor of London, The London Health Inequalities Strategy, 2018</p>	<p>The vision and aims set out in this strategy are derived from an analysis of health inequalities in London, including the variation in healthy life expectancy. It has been further informed by an IIA, and the large response to the public consultation on the draft strategy in 2017. Five key aims have been identified to tackle inequalities and achieve the mayor’s vision in London over the next ten years:</p> <ul style="list-style-type: none"> ■ Healthy Children: Every London Child has a Healthy Start in Life ■ Healthy Minds: All Londoners Share in a City with the Best Mental Health in the World ■ Healthy Places: All Londoners Benefit from an Environment and Economy that Promotes Good Mental and Physical Health ■ Healthy Communities: London’s Diverse Communities are Healthy and Thriving ■ Healthy Living: The Healthy Choice is the Easiest Choice for All Londoners

Document	Key Messages/ Issues
<i>Local</i>	
<p>Tower Hamlets Health and Wellbeing Board: Tower Hamlets Health and Wellbeing Strategy 2021-2025</p>	<p>The Tower Hamlets Health and Wellbeing board is a statutory committee of the council. The board aims to improve the health and wellbeing of local people and tackle health inequalities. The Health and Wellbeing Strategy 2021-2025 is prepared based upon the needs identified within Tower Hamlets health and wellbeing profile.</p> <p>Ambitions for a ‘healthy borough’:</p> <ul style="list-style-type: none"> ▪ Everyone can access safe, social spaces near their home to live healthy lives a community ▪ Children and families are healthy happy and confident ▪ Young adults have the opportunities, connections, and local support to live healthy lives ▪ Middle aged and older people are supported to lived healthy lives and get support early if they need to it ▪ Anyone needing help knows where to get it and is supported to find the right help
<p>Tower Hamlets Spatial Planning and Health Needs Assessment, 2023</p>	<p>This Needs Assessment has been produced to provide detailed guidance on the application of Tower Hamlets existing Local Plan’s policies (2020) in respect of health-related matters. This document highlights the ways in which the planning system can contribute to protecting and improving people’s physical and mental health and promote the creation of healthy places. It explains how the relevant Local Plan policies can be applied to achieve better health outcomes and outlines or signposts other</p>

Document	Key Messages/ Issues
	strategies and initiatives that support and complement the Local Plan policies.

Table E-3 – Relevant Plans, Policies, strategies and Programmes – Economy and Employment

Document	Key Messages/ Issues
<i>National</i>	
Growth and Infrastructure Act (2013)	<p>The Act allows the modification or discharge of the affordable housing elements of section 106 agreements in order to make developments more viable.</p> <p>Contains measures to extend permitted development rights to allow single-storey extensions of up to eight metres.</p> <p>Reduces the volume of extra paperwork required with a planning application; removing over-lapping development consent regimes that require multiple extra permissions from different government agencies.</p>
NPPF, 2023	<p>To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including, but not limited to:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Those who require affordable housing; ■ Families with children; ■ Older people; ■ Students; ■ People with disabilities; ■ Service families; ■ Travellers; ■ People who rent their homes; and ■ People wishing to commission or build their own homes. <p>Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.</p>
The Enterprise Act (2016)	<p>The Enterprise Act includes measures to:</p> <ul style="list-style-type: none"> ■ Establish a Small Business Commissioner to help small firms resolve issues. ■ Extend the Primary Authority scheme to make it easier for businesses to access tailored and assured advice from local authorities, giving them greater confidence to invest and grow. ■ Protect and strengthen apprenticeships by introducing targets for apprenticeships in public sector bodies in England, and

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ▪ Establish an Institute for Apprenticeships – an independent, employer-led body that will make sure apprenticeships meet the needs of business.
<p>UK Industrial Growth Strategy, 2017</p>	<p>The Industrial Strategy sets out a long-term plan to boost the productivity and earning power of people throughout the UK. It sets out how the UK Government is working towards building a Britain fit for the future – how they will help businesses create better higher-paying jobs in every part of the UK with investment in the skills, industries and infrastructure of the future.</p> <p>The strategy includes five foundations:</p> <ul style="list-style-type: none"> ▪ Ideas: the world’s most innovative economy ▪ People: good jobs and greater earning power for all ▪ Infrastructure: a major upgrade to the UK’s infrastructure ▪ Business environment: the best place to start and grow a business ▪ Places: prosperous communities across the UK <p>The UK Government will use this strategy to work with industry, academia and civil society over the coming years to build on the UK’s strengths, make more of untapped potential and create a more productive economy that works for everyone across the UK.</p>
<p>The Clean Growth Strategy, 2017</p>	<p>This Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of “clean growth”, i.e. deliver increased economic growth and decreased emissions. The Strategy has two guiding objectives:</p>

Document	Key Messages/ Issues
	<p>1. To meet our domestic commitments at the lowest possible net cost to UK taxpayers, consumers and businesses; and, 2. To maximise the social and economic benefits for the UK from this transition.</p> <p>In order to meet these objectives, the UK will need to nurture low carbon technologies, processes and systems that are as cheap as possible.</p>
<i>Regional</i>	
<p>Mayor of London, The London Plan 2021. Chapter 6: Economy</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community. Chapter 6: Economy includes:</p> <ul style="list-style-type: none"> ▪ Policy E1 Offices ▪ Policy E2 Providing suitable business space ▪ Policy E3 Affordable workspace ▪ Policy E4 Land for industry, logistics and services to support London’s economic function ▪ Policy E5 Strategic Industrial Locations (SIL) ▪ Policy E6 Locally Significant Industrial Sites ▪ Policy E7 Industrial intensification, co-location and substitution

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy E8 Sector growth opportunities and clusters ■ Policy E9 Retail, markets and hot food takeaways ■ Policy E10 Visitor infrastructure ■ Policy E11 Skills and opportunities for all
<i>Local</i>	
<p>Tower Hamlets Council, Council Strategic Plan 2022-2026</p>	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. Tower Hamlets has a wealth of arts and sporting opportunities. Our local businesses and markets are the lifeblood of the community and should prosper alongside the international business hubs at Canary Wharf, Whitechapel and the City Fringe. At a time of economic uncertainty and rising costs, every resident should be able to access the opportunities on their doorstep.</p> <p>‘Priority 4: Boost culture, business, jobs and leisure’. Ambition is for residents from all backgrounds benefit from thriving sports, the arts, and local business.</p>
<p>Tower Hamlets Council, Tower Hamlets Growth and Economic Development Plan 2018-2023</p>	<p>The Tower Hamlets Growth and Economic Development Plan 2018-2023 aims to build an economy that works for local people and ensure everyone can benefit from the borough’s success. The council’s vision is to create a Tower Hamlets that delivers sustainable and inclusive economic growth enabling all of our residents and businesses to prosper.</p> <p>Priorities:</p> <ul style="list-style-type: none"> ■ Priority 1: Preparing our young people for success ■ Priority 2: Helping our working age residents to thrive

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> Priority 3: Creating the conditions for business growth

Table E-4 – Relevant Plans, Policies, strategies and Programmes – Housing

Document	Key Messages/ Issues
<i>National</i>	
NPPF, 2023	<p>To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.</p> <p>Paragraph 65 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.</p> <p>Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</p>
Planning for the Future White Paper (2020)	<p>Proposes to reform the planning process bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed. The vision is to 'build better, greener and faster'.</p>

Document	Key Messages/ Issues
Housing Act 2004	<p>The Act covers housing conditions, and licensing of houses in multiple occupation and residential accommodation.</p> <p>It requires local housing authorities to assess the accommodation needs of Gypsies and Travellers in their area and produce a strategy on how these needs can be met.</p>
National Planning Practice Guidance (NPPG) – Housing and economic land availability assessment	<p>This Guidance sets out the method for assessing housing and economic land availability. This is used to identify future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.</p>
NPPG – housing and economic needs assessment	<p>This Guidance helps councils to assess their housing needs.</p> <p>The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.</p>
NPPG Housing needs of different groups	<p>This Guidance provides advice on planning for the housing needs of different groups.</p> <p>Authorities must also consider the implications of their duties under the Equality Act 2010, including the Public Sector Equality Duty.</p> <p>When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.</p>
NPPG – Housing for older and disabled people	<p>This Guidance provides advice in preparing planning policies on housing for older and disabled people.</p>

Document	Key Messages/ Issues
	<p>People are living longer lives and the proportion of older people in the population is increasing. The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.</p> <p>Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.</p> <p>Where an identified need exists, plans are expected to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing.</p>
NPPG – Housing supply and delivery	<p>This Guidance provides advice on the 5-year housing land supply and Housing Delivery Test.</p> <p>Authorities should use the standard method as the starting point when preparing the housing requirement in their plan. The purpose of the 5-year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years.</p>
Growth and Infrastructure Act 2013	<p>The Act allows the modification or discharge of the affordable housing elements of section 106 agreements in order to make developments more viable.</p>

Document	Key Messages/ Issues
	<p>Reduces the volume of extra paperwork required with a planning application, and removing over-lapping development consent regimes, to help to improve efficiency of the planning regulations.</p>
<i>Regional</i>	
<p>Mayor of London, The London Plan 2021. Chapter 4: Housing</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure.</p> <p>Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 4: Housing includes:</p> <ul style="list-style-type: none"> ■ Policy H1 Increasing housing supply ■ Policy H2 Small sites ■ Policy H3 Meanwhile use as housing ■ Policy H4 Delivering affordable housing ■ Policy H5 Threshold approach to applications ■ Policy H6 Affordable housing tenure ■ Policy H7 Monitoring of affordable housing ■ Policy H8 Loss of existing housing and estate redevelopment ■ Policy H9 Ensuring the best use of stock ■ Policy H10 Housing size mix ■ Policy H11 Build to Rent

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy H12 Supported and specialised accommodation ■ Policy H13 Specialist older persons housing ■ Policy H14 Gypsy and traveller accommodation ■ Policy H15 Purpose-built student accommodation ■ Policy H16 Large-scale purpose-built shared living
<p>Mayor of London, London Plan Guidance (LPG), Affordable Housing, 2023 (consultation draft)</p>	<p>The Affordable Housing LPG provides a further step to implement the London Plan, ensuring that developments assessed through the planning system maximise affordable housing delivery. It sets out how the threshold approach should work in practice and clarifies the requirements of different types of affordable housing and how they should be secured and monitored.</p> <p>Local planning authorities should apply the threshold approach to applications for sites that are capable of delivering 10 or more homes. When developing new policies on affordable housing, planning obligations and Community Infrastructure Levy (CIL) rates, local plans are required to be in general conformity with the London Plan. LPAs should apply the approach to affordable housing in the London Plan and in this LPG as a part of their plan and decision-making processes.</p>
<p>Mayor of London, London Plan Guidance (LPG), Development Vitality, 2023 (consultation draft)</p>	<p>The draft Development Viability LPG builds upon policy of the London Plan and provides a further step towards ensuring that developments assessed through the planning system maximises affordable housing delivery, setting out how viability assessment should be carried out where a planning application follows the Viability Tested Route. It is relevant to all planning applications where an applicant or planning authority needs to rely on viability</p>

Document	Key Messages/ Issues
	information and should be taken account of by planning authorities where area-wide viability testing is being carried out.
<i>Local</i>	
Tower Hamlets Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The housing crisis is the greatest challenge facing London today. In recent years, Tower Hamlets has delivered more homes than any other authority in England. However, there is an acute shortage of social homes. Too many residents live in overcrowded accommodation. The council will work alongside residents, housing providers and landlords to achieve real change.</p> <p>‘Priority 2: Homes for the future’. Ambition is that everyone in Tower Hamlets lives in a good quality home that they can afford.</p>
Tower Hamlets Council, High Density Living SPD, 2020	The High Density Living Supplementary Planning Document (SPD) provides guidance to shape high density development, so it supports good quality of life for Tower Hamlets’ residents.
Tower Hamlets Council, Central Area Good Growth SPD, 2021	The Central Area Good Growth SPD provides guidance to help the council deliver this housing growth, focusing specifically on design guidance to ensure that new developments respect and enhance the well-established character of this part of the borough. The Central Area Good Growth SPD is a material consideration to help determine planning applications for small-scale residential-led developments in the central part of the London Borough of Tower Hamlets.

Table E-5 – Relevant Plans, Policies, strategies and Programmes – Crime and Safety

Document	Key Messages/ Issues
<i>National</i>	
NPPF, 2023	<p>Paragraph 92 (b) of the policy states that policies should help to develop places that <i>‘are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas’</i>.</p> <p>Places and developments should also create safe spaces where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p>
National Networks National Policy Statement (NN NPS) (2014)	<p>Paragraphs 3.10 – 3.12 of the NN NPS advise that “<i>scheme promoters are expected to take opportunities to improve road safety, including introducing the most modern and effective safety measures where proportionate</i>”, and that it is the UK Government’s policy to ensure that risks of rail passenger and workforce accidents are reduced so far as reasonably practicable.</p>
Crime and Disorder Act, 1998	<p>The Crime and Disorder Act 1998 gave statutory responsibility to local authorities, the police, and key partners to reduce crime and disorder in their communities. Responsible authorities, commonly referred to now as Community Safety Partnerships (CSPs), were required to carry out audits every three years and to implement crime reduction strategies.</p>

Document	Key Messages/ Issues
<p>Highways England Delivery Plan 2015-2020, 2015</p>	<p>Whilst the number of people KSI on UK roads has generally been declining since 2005, over the last few years the number of fatalities has remained fairly consistent with a small increase in KSIs in 2013.</p> <p>Highways England recognise that they must continue to improve safety by investing in the road network, both to prevent incidents from occurring and to reduce the severity of those that do.</p> <p>By end of 2020, they aim to have reached a target of no more than 1,393 KSIs across the network in a year. This will be achieved by a year-on-year reduction in those harmed across the network.</p>
<p>Department for Transport, Road Investment Strategy: for the 2015/16 – 2019/20 Road Period, 2015</p>	<p>Safety is an important consideration for road users owing to the significant impact of serious and fatal accidents. A considerable economic cost is also associated with collisions on all roads, estimated at £15 billion annually to the UK economy.</p> <p>While driverless technology still has to mature, it clearly has the potential to transform the UK’s transport networks – improving safety, reducing congestion, and lowering emissions.</p> <p>Safety and the environment suffering as congested traffic is more polluting and there is an increased risk of accidents.</p> <p>The Strategic Road Network and local networks should work together to provide flexibility and door-to door connectivity for all users. Schemes such as the A453 upgrade highlighted below do just this, and we have also set aside funding in the ring-fenced Cycling, Safety, and Integration Fund to further support connectivity with local networks.</p>
<p><i>Regional</i></p>	

Document	Key Messages/ Issues
<p>Mayor of London, London's Police and Crime Plan 2022-25</p>	<p>The Mayor's Police and Crime Plan sets out his vision for a city in which Londoners are safer – and feel safer. It sets out the key priorities and objectives for policing and community safety in London over the next three years.</p> <p>The four key themes of the Plan are:</p> <ul style="list-style-type: none"> ■ Reducing and preventing violence – preventing and reducing violence affecting young people; making London a city in which women and girls are safer and feel safer; tackling the harm caused by drugs; reducing reoffending by the most violent and high-risk groups; preventing hate crime; and working together to prevent terrorism and violent extremism. ■ Increasing trust and confidence – increasing public trust in the Metropolitan Police Service (MPS) and reducing gaps in confidence between different groups; ensuring that the MPS engages with Londoners and treats them fairly; and ensuring that the MPS, borough councils and all community safety partners respond to neighbourhood crimes such as burglary and anti-social behaviour. ■ Better supporting victims – improving the service and support that victims receive from the MPS and the criminal justice service; working to ensure victims receive a better criminal justice response and outcome; and reducing the number of repeat victims of domestic abuse and sexual violence. ■ Protecting people from being exploited or harmed – reducing the number of young people and adults who are criminally exploited or harmed; keeping young people in the justice system supported and safe; and keeping people safe online.

Document	Key Messages/ Issues
<i>Local</i>	
Tower Hamlets Council, Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The council will assist the police in their fight against crime with more council-funded uniformed police officers, conduct regular surgeries and walkabouts to listen to the community, and lend support to police ward-based forums and increased community policing. Working as part of the Tower Hamlets Community Safety Partnership, the council will support safe spaces, and tackle substance misuse, hate crime, violence against women and girls, and safeguard people who are vulnerable from exploitation and radicalisation.</p> <p>‘Priority 6: Empower Communities and Fight Crime’. Ambition is for residents, workers and visitors of all backgrounds feel safe and welcome in Tower Hamlets.</p>
Tower Hamlets Council, Community Safety Partnership Plan (2021-2024)	<p>The CSP Plan 2021-24 sets out how the council will make Tower Hamlets a safer and more cohesive place to live. The plan has been developed in response to crime, anti-social behaviour, substance misuse and re-offending statistics, and the concerns of local people. In 2021- 2024 our community safety work will focus on:</p> <ul style="list-style-type: none"> ■ Priority 1: Tackling neighbourhood crime and antisocial behaviour (ASB) ■ Priority 2: Tackling hate crime, community tensions and extremism ■ Priority 3: Reducing reoffending and tackling the drivers of crime ■ Priority 4: Safeguarding those at risk of violence and exploitation

Table E-6 – Relevant Plans, Policies, strategies and Programmes – Transport and Accessibility

Document	Key Messages/ Issues
<i>National</i>	
NPPF, 2023	<p>Paragraph 104 - Transport issues should be considered from the earliest stages of plan-making and development proposals so that potential impacts and opportunities are addressed.</p> <p>Paragraph 105 - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</p> <p>Paragraph 106 – Planning policies should:</p> <ul style="list-style-type: none"> ▪ support an appropriate mix of uses across an area to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities; ▪ be prepared with the active involvement of local highways authorities; ▪ identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; ▪ provide for attractive and well-designed walking and cycling networks; and ▪ recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time <p>Paragraph 112 - address the needs of people with disabilities and reduced mobility in relation to all modes of transport.</p>

Document	Key Messages/ Issues
	Paragraph 112 – Developments should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
Department for Transport, Transport Investment Strategy, 2017	<p>This Strategy sets out how the government will build on recent transport progress and how they intend to respond realistically and pragmatically to today’s challenges.</p> <p>They aim to create a more reliable, less congested, and better-connected transport network that works for the users who rely on it. Through investment they aim to achieve:</p> <ul style="list-style-type: none"> ▪ A network that is reliable, well-managed, and safe; ▪ Journeys that are smooth, fast, and comfortable; and ▪ The right connections in the right places
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 10: Transport	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 10: Transport includes:</p> <ul style="list-style-type: none"> ▪ Policy T1 Strategic approach to transport ▪ Policy T2 Healthy Streets

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy T3 Transport capacity, connectivity and safeguarding ■ Policy T4 Assessing and mitigating transport impacts ■ Policy T5 Cycling ■ Policy T6 Car parking ■ Policy T6.1 Residential parking ■ Policy T6.2 Office Parking ■ Policy T6.3 Retail parking ■ Policy T6.4 Hotel and leisure uses parking ■ Policy T6.5 Non-residential disabled persons parking ■ Policy T7 Deliveries, servicing and construction ■ Policy T8 Aviation ■ Policy T9 Funding transport infrastructure through planning
<p>Mayor of London, Mayor’s Transport Strategy, 2018</p>	<p>The Mayor’s Transport Strategy sets out the Mayor’s policies and proposals to reshape transport in London over the next two decades. The central aim of the Mayor’s Transport Strategy is for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041, and for all Londoners to do at least 20 minutes of active travel each day by 2041.</p> <p>Key themes of the strategy:</p> <ul style="list-style-type: none"> ■ Healthy streets and healthy people – Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates ■ A good public transport experience – Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport

Document	Key Messages/ Issues
	<p>could dramatically reduce the number of vehicles on London’s streets</p> <ul style="list-style-type: none"> ■ New homes and jobs – More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone <p>The Healthy Streets Approach is the framework of the strategy. Boroughs can deliver the Healthy Streets Approach in ways that suits the needs and aspirations of their residents and the unique character of their streets through public realm improvements and local policies that promote sustainable travel and deduce the dominance of motorised traffic. Adopting the Healthy Streets Approach is also a requirement of Local Implementation Plan funding and will help boroughs to fulfil their public health duties.</p> <p>Practical steps to achieving healthy streets for London:</p> <ul style="list-style-type: none"> ■ Improving local environments by providing more space for walking and cycling, and better public spaces where people can interact ■ Prioritising better and more affordable public transport and safer and more appealing routes for walking and cycling ■ Planning new developments so people can walk or cycle to local shops, schools and workplaces, and have good public transport links for longer journeys
TfL, Healthy Streets for London, 2017	Although the initial strategy is based in London, the approach is becoming more widely adopted nationally. The Healthy Streets Approach puts people and their health at the centre of decisions

Document	Key Messages/ Issues
	<p>about how we design, manage and use public spaces. It aims to make our streets healthy, safe and welcoming for everyone.</p> <p>The Approach is based on 10 Indicators of a Healthy Street which focus on the experience of people using streets. These are as follows:</p> <ul style="list-style-type: none"> ▪ Pedestrians from all walks of life; ▪ Easy to cross; ▪ People chose to walk, cycle and use public transport; ▪ Clean air; ▪ People feel safe; ▪ Not too noisy; ▪ Places to stop and rest; ▪ Shade and shelter; ▪ People feel relaxed; and ▪ Things to see and do.
<i>Local</i>	
Tower Hamlets Council, Transport strategy 2019-41	<p>Vision: Tower Hamlets has a healthy, safe and environmentally friendly transport system that is accessible and affordable for all who live, work, study and do business in the borough. Desired outcomes:</p> <ul style="list-style-type: none"> ▪ Outcome 1: Tower Hamlets is one of the best places to walk and cycle in London ▪ Outcome 2: Car use is reduced in favour of active, efficient and sustainable transport ▪ Outcome 3: Transport services meet the needs of residents, visitors, businesses and supports growth and the economy

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ▪ Outcome 4: People feel safe and confident when travelling in the borough ▪ Outcome 5: Air quality is improved and our surroundings are quieter and more appealing ▪ Outcome 6: Travel in Tower Hamlets is accessible and affordable for all

Table E-7 – Relevant Plans, Policies, strategies and Programmes – Biodiversity and Natural Capital

Document	Key Messages/ Issues
<i>International</i>	
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)	<p>The convention has three main aims which are stated in Article 1:</p> <ul style="list-style-type: none"> ▪ To conserve wild flora and fauna and their natural habitats; ▪ To promote cooperation between states; and ▪ To give particular attention to endangered and vulnerable species including endangered and vulnerable migratory species.
Conservation of Natural Habitats and Wild Fauna & Flora (the ‘Habitats Directive’) (1992)	<p>The identification of a European network of Sites of Community Importance to be designated as SACs. A SA would need to report on any potential effects on SACs and all development plans should aim to avoid adverse effects on them.</p>

Document	Key Messages/ Issues
<p>EU (2011) EU Biodiversity Strategy to 2020 – towards implementation</p>	<p>Aimed at halting the loss of biodiversity and ecosystem services in the EU by 2020, the strategy provides a framework for action over the next decade and covers the following key areas:</p> <ul style="list-style-type: none"> ■ Conserving and restoring nature; ■ Maintaining and enhancing ecosystems and their services; ■ Ensuring the sustainability of agriculture, forestry and fisheries; ■ Combating invasive alien species; and ■ Addressing the global biodiversity crisis.
<p>EU (2013) 7th Environment Action Programme (EAP) to 2020</p>	<p>The 7th EAP guided EU environmental policy up to 2020 and set ambitions for 2050. The Programme set the following as a priority objective: “to protect, conserve and enhance the Union’s natural capital.”</p> <p>The 7th EAP reflects the EU’s commitment to the preservation of biodiversity and the ecosystem services it provides for both its intrinsic value and its contribution to economic well-being.</p> <p>The Programme highlights that integrating the value of ecosystem services into accounting and reporting across the Union and its member states by 2020 will result in the better management of natural capital.</p>
<p>The Convention on Biological Diversity’s (CBD’s) Strategic Plan for Biodiversity 2011-2020</p>	<p>This plan provides an overarching framework on biodiversity, for all biodiversity-related conventions, the entire United Nations system and all other partners engaged in biodiversity management and policy development.</p> <p>The plan consists of five strategic goals of which 20 further Aichi goals which include:</p>

Document	Key Messages/ Issues
	<p>Strategic Goal A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across Government and society.</p> <ul style="list-style-type: none"> ▪ Strategic Goal B: Reduce the direct pressures on biodiversity and promote sustainable use. ▪ Strategic Goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity. ▪ Strategic Goal D: Enhance the benefits to all from biodiversity and ecosystem services. ▪ Strategic Goal E: Enhance implementation through participatory planning, knowledge management and capacity building.
<p>Ramsar Convention on the Conservation on Wetlands of International Importance (1971)</p>	<p>The Ramsar Convention covers all aspects of wetland conservation. It has three main pillars of activities:</p> <ul style="list-style-type: none"> ▪ The designation of wetlands of international importance as Ramsar sites; ▪ The promotion of the wise use of all wetlands in the territory of each country; and ▪ International co-operation with other countries to further the wise use of wetlands and their resources. <p>While the initial emphasis was on selecting sites of importance to waterbirds, now non-bird features are increasingly taken into account, both in the selection of new sites and when reviewing existing sites.</p>
<p>Kunming-Montreal Global Biodiversity Framework (GBF)</p>	<p>The 15th Conference of Parties to the UN Convention on Biological Diversity adopted the “Kunming-Montreal Global Biodiversity Framework” which includes four goals and 23 targets for achievement by 2030.</p>

Document	Key Messages/ Issues
	<p>The implementation of the Kunming-Montreal Global Biodiversity Framework will be guided and supported through a comprehensive package of decisions also adopted at COP 15. This package includes a monitoring framework for the GBF, an enhanced mechanism for planning, monitoring, reporting and reviewing implementation, the necessary financial resources for implementation, strategic frameworks for capacity development and technical and scientific cooperation, as well as an agreement on digital sequence information on genetic resources.</p> <p>In adopting the Kunming-Montreal Global Biodiversity Framework, all Parties committed to setting national targets to implement it, while all other actors have been invited to develop and communicate their own commitments. At the next meeting of the Conference of the Parties in 2024 in Türkiye, the world will take stock of the targets and commitments that have been set.</p>
UNEP and ELD, State of Finance for Nature, 2022	<p>Time to act: Doubling investment by 2025 and eliminating nature-negative finance flows. The State of Finance for Nature (SFN) 2022 report quantifies public and private finance flows to nature-based solutions (NbS) to tackle global challenges related to biodiversity loss, land degradation and climate change. The SFN 2022 report reveals that if the world wants to halt biodiversity loss, limit climate change to below 1.5C and achieve land degradation neutrality by 2030, current finance flows to NbS must urgently double by 2025 and triple by 2030.</p>
<i>National</i>	
The Environment Act (2021)	<p>The Environment Act, which became law in 2021, acts as the UK’s new framework of environmental protection. The Environment Act allows the</p>

Document	Key Messages/ Issues
	<p>UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>The Biodiversity Gain objective requires the biodiversity value attributable to a development to exceed pre-development biodiversity value by at least 10%.</p>
<p>HM Government, 25 Year Environment Plan, 2018</p>	<p>The 25 Year Environment Plan outlines the UK Government’s ambition to leave our environment in a better state than we found it and the steps proposed to take to achieve that ambition.</p> <p>The Plan includes ten key targets of which two focus on biodiversity.</p> <p><u>Thriving plants and wildlife:</u></p> <ul style="list-style-type: none"> ■ Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term; ■ Creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits; ■ Taking action to recover threatened, iconic or economically important species of animals, plants and fungi and where possible to prevent human-induced extinction or loss of known threatened species in England and the Overseas Territories; ■ Increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042. <p><u>Enhancing biosecurity:</u></p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Managing and reducing the impact of existing plant and animal diseases; lowering the risk of new ones and tackling invasive non-native species; ■ Reaching the detailed goals to be set out in the Tree Health Resilience Plan of 2018; ■ Ensuring strong biosecurity protection at our borders, drawing on the opportunities leaving the EU provides; and ■ Working with industry to reduce the impact of endemic disease.
<p>HM Government, Environmental Improvement Plan 2023</p>	<p>The 25 Year Environment Plan set out the ambition to refresh the plan every five years, a commitment set into law in the Environment Act 2021. This document continues to use the ten goals set out in the 25 Year Environment Plan; however, ‘Thriving Plants and Wildlife’ has since become the apex goal. It outlines the progress made so far and how Defra intends to deliver the framework and vision of the 25 Year Environment Plan.</p>
<p>Wildlife and Countryside Act (as amended 1981)</p>	<p>The Wildlife and Countryside Act 1981 consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive) in Great Britain (NB Council Directive 79/409/EEC has now been replaced by Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version).</p> <p>The Act provides for the notification and confirmation of SSSIs and the protection of wildlife.</p>

Document	Key Messages/ Issues
<p>Working with the grain of nature: A Biodiversity Strategy for England 2002</p>	<p>The Biodiversity Strategy for England sets a fundamental shift by ensuring that biodiversity considerations become embedded in all the main sectors of economic activity, public and private. The Strategy capitalises on the opportunities presented by the report of the Policy Commission on Food and Farming and the current review of the Common Agricultural Policy.</p> <p>The Strategy sets out a programme for five years for the other main policy sectors, to make the changes necessary to conserve, enhance and work with the grain of nature and ecosystems rather than against them. It takes account of climate change as one of the most important factors affecting biodiversity and influencing policies.</p>
<p>The Natural Environment White Paper (2011)</p>	<p>The aim of the White Paper is to set out a clear framework for protecting and enhancing the things that nature gives us for free.</p> <p>Four core themes:</p> <ol style="list-style-type: none"> 1. Protecting and improving our natural environment 2. Growing a green economy 3. Reconnecting people and nature 4. International and EU leadership
<p>Making Space for Nature: A review of England's Wildlife Sites and Ecological Network: Chaired by Professor Sir John Lawton CBE FRS (2010)</p>	<p>Species and habitats should be restored and enhanced in comparison with 2000 levels.</p> <p>Improve the long-term sustainability of ecological and physical processes that underpin the functioning of ecosystems, thereby enhancing the capacity of ecosystem services.</p>

Document	Key Messages/ Issues
	Provide accessible natural environments rich in wildlife for people to enjoy and experience.
The Natural Choice: Securing the value of nature; HM Government (2011)	<p>Protect and enhance biodiversity through Nature Improvement Areas (NIAs), biodiversity offsetting, Local Nature Partnerships and phasing out peat use.</p> <p>Place natural capital at the centre of economic decision making to avoid the unintended environmental consequences that arise from undervaluing natural assets.</p>
NN NPS, (2014)	<p>NN NPS states that development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation to counteract impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.</p> <p>Paragraphs 3.2 to 3.5 of the NN NPS state that not only should national road and rail networks be designed to minimise social and environmental impacts, but that they should also seek to improve quality of life. In part this may be achieved by <i>“reconnecting habitats and ecosystems [...] improving water quality and reducing flood risk, [...] and addressing areas of poor air quality.”</i></p> <p>Paragraph 5.162 recognises the potential for developments to provide positive environmental and economic benefits through the provision of green infrastructure. Paragraph 5.175 of the NN NPS highlights that</p>

Document	Key Messages/ Issues
	green infrastructure identified in development plans should be protected and, where possible, enhanced.
NPPF, 2023	<p>Paragraphs 174 and 179 to 182 of the NPPF require development to protect and safeguard biodiversity, and advise that development should aim to conserve, restore and enhance biodiversity adequately through mitigation or, as a last resort, using compensation. Proposals which aim to conserve or enhance biodiversity should be supported.</p> <p>Recognise the wider benefits of ecosystem services; minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the UK Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.</p> <p>Paragraph 174 of the NPPF requires that planning decisions should be taken to enhance the natural environment by recognising the wider benefits from natural capital and ecosystem services. Further, Paragraph 175 requires plans to take a strategic approach to maintaining and enhancing green infrastructure networks and improving natural capital at a catchment or landscape scale.</p>
The State of Natural Capital: Restoring our Natural Assets; Natural Capital Committee (2014)	<p>The report identifies that:</p> <ul style="list-style-type: none"> ■ Some assets are currently not being used sustainably and the benefits that we derive from them are at risk; ■ There are major economic benefits to be gained from natural capital and that their value should be incorporated into decision making; and ■ A long-term restoration plan is necessary to maintain and improve natural capital for future generations.

Document	Key Messages/ Issues
<p>The State of Natural Capital; Natural Capital Committee (2020)</p>	<p>In the report, the Natural Capital Committee sets out:</p> <ul style="list-style-type: none"> ■ Despite some improvements, only limited progress has been made towards the 25 Year Environment Plan’s goals. ■ Its advice to Government that biodiversity net gain should be expanded to environmental net gain. ■ Its advice that an England wide baseline of natural capital assets should be established to measure progress towards environmental goals. <p>Natural capital should be seen as infrastructure in its own right, in recognition of its contribution to economic wellbeing.</p>
<p>Natural Environment and Rural Communities (NERC) Act 2006</p>	<p>Makes provision about bodies concerned with the natural environment and rural communities, wildlife, sites of special scientific interest, National Parks and the Broads, rights of way, and other functions relating to the environment and rural affairs. Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (or the ‘Biodiversity Duty’) states that: “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.</p> <p>You should be able to show your duty to have regard for conserving biodiversity if you have identified ways to integrate biodiversity when you:</p> <ul style="list-style-type: none"> ■ develop policies and strategies and put them into practice ■ manage the planning system ■ manage: <ul style="list-style-type: none"> – your land and buildings

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> – woodlands and nature reserves – gardens, parks and public open space – community amenities e.g., sports grounds and cemeteries – waste and pollution – energy and water – wood and plant products <ul style="list-style-type: none"> ■ develop infrastructure, such as roads, buildings or flood defences ■ make decisions about procurement ■ implement economic, environmental and social programmes
<p>The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</p>	<p>10.—(1) The appropriate agency must, for each river basin district, maintain, review and keep up to date a register of the protected areas lying (whether wholly or partly) within the district. (2) The register must include the following protected areas—</p> <p>(iv) areas designated for the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in the protection of the habitats or species.</p>
<p><i>Regional</i></p>	
<p>Mayor of London, The London Plan 2021. Chapter 8: Green Infrastructure and Natural Environment</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve</p>

Document	Key Messages/ Issues
	<p>relevant stakeholders, including the local community. Chapter 8: Green Infrastructure and Natural Environment includes:</p> <ul style="list-style-type: none"> ■ Policy G1 Green infrastructure ■ Policy G2 London’s Green Belt ■ Policy G3 Metropolitan Open Land ■ Policy G4 Open space ■ Policy G5 Urban greening ■ Policy G6 Biodiversity and access to nature ■ Policy G7 Trees and woodlands ■ Policy G8 Food growing ■ Policy G9 Geodiversity
<i>Local</i>	
Tower Habitats, Tower Hamlets Local Biodiversity Action Plan 2019-2024	The Local Biodiversity Action Plan (LBAP) for Tower Hamlets sets priorities and targets for conservation of species and habitats across the borough and provides details of what actions we will undertake to achieve these targets. Organisations signed up to these actions include Council departments, Tower Hamlets Homes and other housing associations, charities such as Thames21 and community groups such as the Friends of Tower Hamlets Cemetery Park.
Tower Hamlets, Green Grid Strategy, 2017	The Green Grid Strategy provides a framework for the design and delivery of appealing walking routes and associated green infrastructure across Tower Hamlets, to secure a healthy and attractive environment for residents, workers and visitors.



Document	Key Messages/ Issues
	The strategy proposes a number of borough-wide strategic actions, a set of overarching design principles, a number of site-specific improvements.

Table E-8 – Relevant Plans, Policies, strategies and Programmes – Landscape and Townscape

Document	Key Messages/ Issues
<i>International</i>	
<p>European Landscape Convention 2000 (Became binding March 2007)</p>	<p>The Council of Europe Landscape Convention promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. Specific measures include:</p> <ul style="list-style-type: none"> ▪ raising awareness of the value of landscapes among all sectors of society and of society's role in shaping them; ▪ promoting landscape training and education among landscape specialists, other related professions and in school and university courses; ▪ the identification and assessment of landscapes, ▪ analysis of landscape change, with the active participation of stakeholders; ▪ setting objectives for landscape quality, with the involvement of the public; and ▪ the implementation of landscape policies through the establishment of plans and practical programmes.
<i>National</i>	
<p>Accessible Natural Green Space Standards in Towns and Cities: A review and Toolkit for their Implementation (2003) and Nature Nearby: Accessible Green Space Guidance (2010)</p>	<p>English Nature (now Natural England) recommends that provision should be made of at least 2ha of accessible natural greenspace per 1000 population according to a system of tiers into which sites of different sizes fit:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ No person should live more than 300m from their nearest area of natural greenspace; ■ There should be at least one accessible 20ha site within 2km from home; ■ There should be one accessible 100ha site within 5km; and ■ There should be one accessible 500ha site within 10km.
Guidance for Outdoor Sport and Play (2015)	Fields in Trust guidance, first published in the 1930s, is based on a broad recommendation that 6 acres (2.4 hectares) of accessible green space per 1,000 head of population enables residents of all ages to participate in sport and play; 75% of local authorities adopt this or an equivalent standard (2014 Fields in Trust / David Lock Associates Survey).
Local Green Infrastructure: helping communities make the most of their landscape: Landscape Institute for Green Infrastructure Partnership (2011).	Communities should identify green infrastructure requirements in their local area through addition to or creative enhancement of the existing network. Look to enhance local landscape character, heritage and biodiversity and ensure long term management is included in an overall strategy.
Green Infrastructure: An integrated approach to landscape use. Landscape Institute Position Statement (2013)	The Landscape Institute’s most recent position statement, ‘Green Infrastructure LI Position Statement 2013’ sets out why GI is crucial to our sustainable future. The publication showcases a range of successful GI projects and shows how collaboration is key to delivering multifunctional landscapes. It also illustrates why landscape professionals should take the lead on the integration of GI.

Document	Key Messages/ Issues
National Policy Statement for National Networks (2014)	Paragraph 5.149 states that when judging the impact of a project on landscape, the decision is dependent on the nature of the existing landscape likely to be affected and the nature of the effect likely to occur. The project should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
25 Year Environment Plan (2018)	Goal 6: Enhancing beauty, heritage and engagement with the natural environment, is to “safeguard and enhance the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.”
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 3: Design	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 3: Design includes:</p> <ul style="list-style-type: none"> ■ Policy D1 London’s form, character and capacity for growth ■ Policy D2 Infrastructure requirements for sustainable densities ■ Policy D3 Optimising site capacity through the design-led approach

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy D4 Delivering good design ■ Policy D5 Inclusive design ■ Policy D6 Housing quality and standards ■ Policy D7 Accessible housing ■ Policy D8 Public realm ■ Policy D9 Tall buildings ■ Policy D10 Basement development
<p>Mayor of London, The London Plan 2021. Chapter 7: Heritage and Culture</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 7: Heritage and Culture includes:</p> <ul style="list-style-type: none"> ■ Policy HC3 Strategic and Local Views ■ Policy HC4 London View Management Framework ■ Policy HC5 Supporting London’s culture and creative industries ■ Policy HC6 Supporting the night-time economy ■ Policy HC7 Protecting public houses
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The</p>

Document	Key Messages/ Issues
	<p>strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> ▪ London Plan ▪ Transport ▪ Housing ▪ Economic Development ▪ Culture ▪ Health Inequalities <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> ▪ Green infrastructure. London will be the world’s first National Park City, where more than half of its area is green, where the natural environment is protected, and where the network of green infrastructure is managed to benefit all Londoners
<i>Local</i>	
Tower Hamlets Council, Tall Buildings SPD (<i>Draft</i>)	The Tall Buildings SPD is a proposed planning document that will add guidance to the design, location and development of tall buildings and address the overall impact that this development can have on local residents.

Table E-9 – Relevant Plans, Policies, strategies and Programmes – Historic Environment

Document	Key Messages/ Issues
<i>International</i>	
UNESCO, The World Heritage Convention, 1972	This convention sets out a framework for the identification and designation of cultural or natural heritage sites of ‘outstanding universal value’ as World Heritage Sites.
The Valetta Convention, 1992	<p>This convention outlines protection measures for archaeological heritage assets, including the development and maintenance of an inventory of sites. The aim of this convention is to protect sites for future study, outlines the requirements to report ‘chance finds’, as well as controlling excavations.</p> <p>The input of expert archaeologists into the making of planning policies and decisions is also required under this convention.</p>
Convention for the Protection of the Architectural Heritage of Europe, Granada (1985)	<p>The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe’s heritage. It affirms the needs for European solidarity with regard to heritage conservation and is designed to foster practical co-operation among the Parties.</p> <p>The convention considers comprising the following permanent properties, which are stated in Article 1:</p> <ul style="list-style-type: none"> ▪ Monuments: all buildings and structures of conspicuous historical, archaeological, artistic, scientific, social or technical interest, including their fixtures and fittings; ▪ Groups of buildings: homogenous groups of urban or rural buildings conspicuous for their historical, archaeological,

Document	Key Messages/ Issues
	<p>artistic, scientific, social or technical interest, which are sufficiently coherent to form topographically definable units; and</p> <ul style="list-style-type: none"> ▪ Sites: the combined works of man and nature, being areas which are partially built upon and sufficiently distinctive and homogenous to be topographically definable and are of conspicuous historical, archaeological, artistic, scientific, social or technical interest.
<i>National</i>	
NPPF, 2023	<p>Paragraph 190 states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place”.

Document	Key Messages/ Issues
NN NPS (2014)	Paragraph 5.149 states that when judging the impact of a project on landscape, the decision is dependent on the nature of the existing landscape likely to be affected and the nature of the effect likely to occur. The project should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
25 Year Environment Plan (2018)	Goal 6: Enhancing beauty, heritage and engagement with the natural environment, is to “safeguard and enhance the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage.”
Planning (Listed buildings and Conservation Areas) Act 1990	This is an Act relating to special controls in respect of buildings and areas of special architectural or historic interest.
1979 Ancient Monuments and Archaeological Areas Act	Where Ancient Monuments occur on agricultural land the following Act influences the extent of public control to ensure the protection of scheduled ancient monuments.
Historic England, The Historic Environment and Site Allocations in Local Plans	This advice note supports Local Plan development and outlines how to correctly implement historic environment legislation within Local Plans. The note also outlines how to minimise harm to the significance and setting of the historic environment through site allocations, including advice on evidence gathering and site selection methodology.

Document	Key Messages/ Issues
Historic England, Sustainability Appraisal and Strategic Environmental Assessment	Advice to support the assessment of plans on the historic environment and advice on heritage considerations for SA and (SEA processes). The advice note also offers guidance on implementing historic environment legislation appropriately within plans and assessments.
Historic England, The Setting of Heritage Assets	Guidance on managing the change within the settings of heritage assets through development. Outlines the role that setting plays in the significance of heritage assets and outlines how to incorporate heritage assets and their settings in decision making of developments.
Historic England Advice Note 4 Tall Buildings 2022	This Advice Note (HEAN 4) provides advice on planning for tall buildings within the historic environment. Its purpose is to support LPAs, developers, communities and other stakeholders in dealing with tall buildings proposals within the legislative and planning framework relevant to the historic environment.
Historic England, Managing Local Authority Heritage Assets	Guidance for local authorities regarding best practice guidance on how to safeguard and enhance heritage assets, as well as bringing them into productive use.
<i>Regional</i>	
Mayor of London, The London Plan 2021. Chapter 7: Heritage and Culture	The London Plan (2021) is London’s Spatial Development Strategy (SDS). It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social

Document	Key Messages/ Issues
	<p>infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 7: Heritage and Culture includes:</p> <ul style="list-style-type: none"> ■ Policy HC1 Heritage conservation and growth ■ Policy HC2 World Heritage Sites
<i>Local</i>	
<p>Tower Hamlets Council, Conservation Strategy 2017-2027</p>	<p>The Conservation Strategy aims to protect and enhance Tower Hamlets’ heritage and ensure that it can be appreciated and enjoyed by current and future generations. A key part of this is to ensure increased community engagement and involvement in the heritage as a critical part of ensuring its on-going sustainability. The Strategy also aims to enhance the contribution of the heritage to other strategic priorities of the borough, to ensure that heritage plays an active role in the borough’s on-going regeneration and development, thereby helping to improve quality of life for all.</p> <p>The vision for the Tower Hamlets Conservation Strategy consists of three aims:</p> <ul style="list-style-type: none"> ■ Aim 1 Understanding and appreciating our rich heritage, and recognising its contribution to the borough’s vibrancy and distinctiveness ■ Aim 2 Conserving and protecting the borough’s historic environment, and capitalising on opportunities for attracting investment, conservation-led regeneration and positive place shaping

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Aim 3 Enjoying, celebrating and engaging with our rich history, and promoting Tower Hamlets as a distinctive and welcoming place to live, work and visit for current and future generations
London Borough of Tower Hamlets conservation area appraisals	There are 58 conservation areas in Tower Hamlets. Each one has an adopted character appraisal and management guidelines document. These describe the architectural and historic character and significance of each area, and provide guidance to residents, businesses and other stakeholders about how the character can be preserved and enhanced.

Table E-10 – Relevant Plans, Policies, strategies and Programmes – Water Environment

Document	Key Messages/ Issues
<i>International</i>	
Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (“The Water Framework Directive”)	<p>The main aims of the Water Framework Directive (WFD) are to:</p> <ul style="list-style-type: none"> ■ prevent deterioration and enhance status of aquatic ecosystems, including groundwater ■ promote sustainable water use ■ reduce pollution ■ contribute to the mitigation of floods and droughts <p>The WFD requires the creation of River Basin Management Plans (RBMPs).</p> <p>Statutory objectives are set for Scottish waters through River Basin Management Planning. These objectives are based on ecological assessments and economic judgments. The plans cover all types</p>

Document	Key Messages/ Issues
	of water body, e.g., rivers, lochs, lakes, estuaries, coastal waters and groundwater.
Directive 2007/60/EC of the European Parliament and of the Council of 23 October 2007 on the assessment and management of flood risks	Requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk.
Directive 2006/118/EC of the European Parliament and of the Council of 12 December 2006 on the protection of groundwater against pollution and deterioration	This Directive establishes a regime which sets groundwater quality standards and introduces measures to prevent or limit inputs of pollutants into groundwater. The directive establishes quality criteria that takes account local characteristics and allows for further improvements to be made based on monitoring data and new scientific knowledge.
<i>National</i>	
NPPF, 2023 -	Paragraph 159 "... inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere".
The Environment Act (2021)	The Environment Act, which became law in 2021, acts as the UK's new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction. Objectives for targets under consideration

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> • reduce pollution from agriculture, in particular phosphorus and nitrate • reduce pollution from wastewater, in particular phosphorus and nitrate • reduce water demand • improve the quality of habitat on land, including freshwater and coastal sites, expressed through the condition of our protected sites (SSSIs) • improve the overall status of species populations on land and in freshwaters
<p>NN NPS (2014)- Paragraph 5.105</p>	<p>“... if there is no reasonably available site in Flood Zones 1 or 2, then national networks infrastructure projects can be located in Flood Zone 3, subject to the Exception Test. Both elements of the test will have to be passed for development to be consented...”</p>
<p>NN NPS (2014)- Paragraph 5.109</p>	<p>“Any project that is classified as ‘essential infrastructure’ and proposed to be located in Flood Zone 3a or 3b should be designed and constructed to remain operational and safe for users in times of flood; and any project in Zone 3b should result in no net loss of floodplain storage and not impede water flows”.</p>
<p>NN NPS (2014)- Paragraph 5.224</p>	<p>“Activities that discharge to the water environment are subject to pollution control”</p>
<p>NN NPS (2014)- Paragraph 5.225</p>	<p>“... impacts on the water environment should be given more weight where a project would have adverse effects on the achievement of</p>

Document	Key Messages/ Issues
	the environmental objectives established under the Water Framework Directive”.
A Green Future: Our 25 Year Plan to Improve the Environment (2018)- Goal 2 ‘Clean and plentiful water’	“Improve at least three quarters of our waters to be close to their natural state as soon as is practicable by: [...] Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water”.
<i>Regional</i>	
London Sustainable Drainage Action Plan	<p>The London Sustainable Drainage Action Plan addresses a specific need to promote the awareness, and the retrofitting, of sustainable drainage systems right across London. It contains a series of actions to make our drainage system work in a more natural way which will bring a wide range of benefits including:</p> <ul style="list-style-type: none"> ▪ steadily reducing flood risks by easing the burden on our drains and sewers ▪ reducing pollution of our tributary rivers and streams ▪ creating more pleasant landscapes, streets and settings for London’s buildings ▪ providing opportunities to save water ▪ providing opportunities for school activities and studies related to the water cycle
Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure	The London Plan (2021) is London’s Spatial Development Strategy (SDS). It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs

Document	Key Messages/ Issues
	<p>should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> ■ Policy SI 5 Water infrastructure ■ Policy SI 12 Flood risk management ■ Policy SI 13 Sustainable drainage ■ Policy SI 14 Waterways – strategic role ■ Policy SI 15 Water transport ■ Policy SI 16 Waterways – use and enjoyment ■ Policy SI 17 Protecting and enhancing London’s waterways
<i>Local</i>	
<p>AECOM, London Borough of Tower Hamlets Strategic Flood Risk Assessment, 2017</p>	<p>London Borough of Tower Hamlets Strategic Flood Risk Assessment (SFRA) identifies the spatial variation in flood risk across the borough thus allowing an area-wide comparison of future development sites with respect to flood risk considerations.</p>

Table E-11 – Relevant Plans, Policies, strategies and Programmes – Air Quality

Document	Key Messages/ Issues
<i>International</i>	
Ambient Air Quality Directive	The Ambient Air Quality Directive provides the current framework for the control of ambient concentrations of air pollution in the EU. The control of emissions from mobile sources, improving fuel quality and promoting and integrating environmental protection requirements into the transport and energy sector are part of these aims.
<i>National</i>	
The Environment Act (2021)	<p>The Environment Act, which became law in 2021, acts as the UK’s new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>Objectives for targets under consideration</p> <ul style="list-style-type: none"> • reducing the annual mean level of fine particulate matter (PM_{2.5}) in ambient air (as required by the Environment Bill) • in the long-term, reducing population exposure to PM_{2.5}
25 Year Environment Plan, HM Government (2018)	With regards to the transport sector, the 25 Year Environment Plan identifies four ‘early’ priorities through the ‘Future of Mobility Grand Challenge’. These include encouraging new modes of transport; addressing the challenges of moving from hydrocarbon to zero emission vehicles; and Preparing for a future of new mobility

Document	Key Messages/ Issues
	services, increased autonomy, journey-sharing and a blurring of the distinctions between private and public transport.
The Clean Growth Strategy, 2017	<p>This Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of “clean growth”, i.e., deliver increased economic growth and decreased emissions.</p> <p>Key Policies and Proposals in the Strategy:</p> <ul style="list-style-type: none"> ■ Develop world leading Green Finance capabilities; ■ Develop a package of measures to support businesses to improve their energy productivity, by at least 20 per cent by 2030; ■ Improving the energy efficiency of our homes; ■ Rolling out low carbon heating; ■ Accelerating the shift to low carbon transport; ■ Delivering clean, smart, flexible power emissions; and ■ Enhancing the benefits and value of our natural resources.
NN NPS (2014)- Paragraph 5.12	Accords air quality considerations substantial weight where, after taking into account mitigation, a scheme would lead to a significant air quality impact in relation to Environmental Impact Assessment (EIA) and/ or where they lead to deterioration in air quality in a zone/ agglomeration.
Clean Air Strategy 2019	Addresses action to reduce emissions from transport “as a significant source of emissions of air pollution”, in-particular oxides of nitrogen (NO _x) – which is responsible for high levels of NO ₂ in ambient air, especially in urban areas - and particulate (PM ₁₀ and PM _{2.5}) emissions.
<i>Regional</i>	

Document	Key Messages/ Issues
<p>Mayor of London, London Local Air Quality Management (LLAQM), 2019</p>	<p>The Mayor’s LLAQM framework is the statutory process used by local authorities to review and improve air quality within their areas. The new LLAQM made updates to:</p> <ul style="list-style-type: none"> ■ Ensure boroughs are taking ambitious action, which is properly co-ordinated at the regional level, and which supports Mayoral objectives including those set out in the London Environment Strategy; ■ Ensure that London boroughs continue to work towards achievement of World Health Organisation safe limits for pollutants even when legal limits are met; ■ Update information in the guidance documents to reflect new research, policies, and priorities; and ■ Update Cleaner Air Borough Status (a recognition scheme for boroughs that was introduced under the previous Mayor) so that it is transparent and fair, now promotes continual improvement, and clearly aligns with new LLAQM priorities. <p>As part of LLAQM, all London boroughs must submit Annual Status Reports (ASRs).</p>
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community. Chapter 9: Sustainable Infrastructure includes:</p>

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy SI 1 Improving air quality
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> ■ London Plan ■ Transport ■ Housing ■ Economic Development ■ Culture ■ Health Inequalities <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> ■ Air quality. London will have the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities
<p><i>Local</i></p>	
<p>Tower Hamlets Council, London Borough of Tower Hamlets Air Quality Action Plan 2022 – 2027</p>	<p>This Air Quality Action Plan (AQAP) has been produced as part of our responsibility under London Local Air Quality Management. The AQAP outlines the action to improve air quality in the London Borough of Tower Hamlets (LBTH) between 2022 – 2027.</p>

Document	Key Messages/ Issues
	<p>Priorities:</p> <ul style="list-style-type: none"> ■ Continue monitoring air pollutants and carrying out other core statutory duties to improve air quality within the Borough ■ Reducing emissions from developments and buildings ■ Increasing public health and awareness raising to reduce exposure to air pollution ■ Working with businesses in delivery servicing and freight to decrease air emissions ■ Reducing emission from Council fleet ■ Localised solutions such as expanding and improving green infrastructure, Low Emission Neighbourhoods (LENs) (subject to securing funding), replacing boilers and implementing insulation schemes in schools and Council properties, etc. ■ Improving cleaner transport within the Borough through transport and air quality policies, idling enforcement, car free days, pedestrianisation schemes projects, installation of electric vehicle charging points, and supporting walking and cycling.

Table E-12 – Relevant Plans, Policies, strategies and Programmes – Climate Change and Greenhouse Gases

Document	Key Messages/ Issues
<i>International</i>	
Kyoto Protocol to the UN Framework Convention on Climate Change (1992) Doha Amendment to the Kyoto Protocol (2012)	Developed countries commit themselves to reducing their collective emissions of six key greenhouse gases by at least 5%. Each country’s emissions target must be achieved by the period 2008-2012. Doha Amendment saw parties commit to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020.
The Paris Agreement, 2015	Aims to limit the global warming change to below 2°C above pre-industrial levels. However, countries aim to limit the increase to 1.5°C to reduce the impacts of global warming. The EU has committed to a binding target of a reduction of at least 40% in greenhouse gas emissions by 2030 compared to 1990
IEMA (2023) Practical steps for decarbonising local plans	<p>Toolkit to help close the gaps between climate action plans and the planning process, and to improve the plan’s evidence base. IEMA’s climate change and energy policy steering group has worked with IEMA members in the planning and infrastructure emissions fields to create a simple set of stages for local authorities to follow.</p> <ul style="list-style-type: none"> ▪ Stage one provides a clear understanding of baseline emissions and future carbon budgets. ▪ Stage two shows simple steps for calculating emissions linked to alternative policy options. ▪ Step three describes how the monitoring process feeds back into the review.

Document	Key Messages/ Issues
	Critically, the toolkit shows how each of the stages interacts with the authority’s climate action plan.
<i>National</i>	
NPPF, 2023	<p>Paragraph 154 of the NPPF states that “New development should be planned for in ways that:</p> <p>a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and</p> <p>b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the UK Government’s policy for national technical standards.”</p>
The Climate Change Act, 2008	<p>Improve carbon management and help the transition towards a low carbon economy in the UK.</p> <p>Demonstrate strong UK leadership internationally, showing the commitment to taking shared responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen in 2009.</p> <p>Greenhouse gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.</p>

Document	Key Messages/ Issues
<p>NN NPS, 2014</p>	<p>Paragraph 4.38 of the NN NPS states that <i>“New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure.”</i></p> <p>The NN NPS also requires carbon impacts to be considered as part of the appraisal of scheme options, and an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. <i>It goes on to state that “it is very unlikely that the impact of a road project will, in isolation, affect the ability of UK Government to meet its carbon reduction plan targets.”</i></p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment, 2018</p>	<p>The 25 Year Environment Plan outlines the UK Government’s ambition to leave our environment in a better state than we found it and the steps proposed to take to achieve that ambition.</p> <p>Mitigating and adapting to climate change:</p> <p>Continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases. The UK Climate Change Act 2008 commits us to reducing total greenhouse gas emissions by at least 80 per cent by 2050 when compared to 1990 levels;</p> <p>Making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century; and</p>

Document	Key Messages/ Issues
	Implementing a sustainable and effective second National Adaptation Programme.
UK Committee on Climate Change, Interim UK Carbon Budgets	<p>The UK has committed to an 80% reduction in its greenhouse gas emissions by 2050. In order to help meet this target, the UK Committee on Climate Change (CCC) has devised a series of interim UK “carbon budgets” as follows:</p> <ul style="list-style-type: none"> ■ 1st carbon budget (2008 to 2012): 23% reduction; ■ 2nd carbon budget (2013 to 2017): 29% reduction; ■ 3rd carbon budget (2018 to 2022): 35% reduction by 2020; ■ 4th carbon budget (2023 to 2027): 50% reduction by 2025; ■ 5th carbon budget (2028 to 2032): 57% reduction by 2030.
25 Year Environment Plan, HM Government (2018)	Goal 7 of the 25 Year Environment Plan, ‘Mitigating and adapting to climate change’, is to “take all possible action to mitigate climate change, while adapting to reduce its impact” by “continuing to cut greenhouse gas emissions including from land use, land use change...” and “making sure that all policies, programmes and investment decisions consider the possible extent of climate change this century”.
<i>Regional</i>	
Mayor of London, London Environment Strategy, 2018	The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.

Document	Key Messages/ Issues
	<p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> ▪ London Plan ▪ Transport ▪ Housing ▪ Economic Development ▪ Culture ▪ Health Inequalities <p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> ▪ Adapting to climate change. London and Londoners will be resilient to severe weather and longer-term climate change impacts. This will include flooding, heat risk and drought ▪ Climate change and energy. London will be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> ▪ Policy SI 2 Minimising greenhouse gas emissions

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Policy SI 4 Managing heat risk
<i>Local</i>	
Tower Hamlets Council, Net Zero Carbon Plan, 2020	<p>The borough council is implementing its Net Zero Carbon Plan which sets out their goals and commitment to tackling the climate emergency. Objectives of the plan:</p> <ul style="list-style-type: none"> ■ A Net Zero Carbon Council by 2025 – In March 2019, Tower Hamlets Council declared a climate emergency. The Council is now aiming to be Net Zero Carbon by 2025. This report shows that it is possible but that it will require decisive action starting now to reduce direct emissions by 75%. The residual emissions will have to be offset ■ A Net Zero Carbon Borough by 2050 – This report also recommends that Tower Hamlets Council uses its powers, influence and leadership to put the Borough on the right track to achieve Net Zero Carbon by 2050 (or earlier if possible)
Tower Hamlets Council, Council Strategic Plan 2022-2026	<p>The strategic plan is the council’s main plan and sets out the most important priorities for the council between 2022 and 2026. The council is commitment to be carbon neutral by 2025 and a carbon neutral borough by 2045. The commitments mean will reduce and offset the amount of carbon created as a council and borough partnership.</p> <p>‘Priority 6: A clean and green future’. Ambition is that cleanliness and air quality improve, emissions and noise</p>



Document	Key Messages/ Issues
	nuisance reduce, and everybody benefits from parks and more trees.

Table E-13 – Relevant Plans, Policies, strategies and Programmes – Material Assets

Document	Key Messages/ Issues
<i>National</i>	
The Environment Act (2021)	<p>The Environment Act, which became law in 2021, acts as the UK's new framework of environmental protection. The Environment Act allows the UK to enshrine better environmental protection into law. It provides the Government with powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction.</p> <p>Objectives for targets under consideration</p> <ul style="list-style-type: none"> ■ increase resource productivity ■ reduce the volume of 'residual' waste we generate
NPPF, 2023	<p>Paragraph 174 states: "... <i>contribute to and enhance the natural and local environment by:</i></p> <ul style="list-style-type: none"> ■ Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils...; ■ Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability...; and ■ Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate". <p>Paragraph 17 also seeks to facilitate the sustainable use of minerals.</p>

Document	Key Messages/ Issues
	<p>Paragraph 210 encourages so far as practicable, planning policies should <i>“take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously”</i>.</p> <p>Paragraph 183 states: <i>“Planning policies and decisions should ensure that:</i></p> <ul style="list-style-type: none"> (a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation) (b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and (c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.
<p>NN NPS (2014)</p>	<p>Paragraph 5.117 requires land stability to be considered in respect of new development. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability.</p> <p>Paragraph 5.168 states <i>“Applicants should also identify any effects, and seek to minimise impacts, on soil quality, considering</i></p>

Document	Key Messages/ Issues
	<p><i>any mitigation measures proposed. Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this”.</i></p> <p>Paragraph 5.19 states “<i>Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout and use of materials) in both design and construction should be presented”.</i></p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment (2018)</p>	<p>Goal 5 ‘Clean and plentiful water’ involves using resources from nature more sustainably and efficiently. The plan states: “<i>Improve our approach to soil management: by 2030 we want all of England’s soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches”.</i></p>
<p>Our Waste, Our Resources: A Strategy for England (Dec 2018)</p>	<p>Sets out how the UK Government aims to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.</p>
<p><i>Regional</i></p>	
<p>Mayor of London, The London Plan 2021. Chapter 9: Sustainable Infrastructure</p>	<p>The London Plan (2021) is London’s SDS. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. When preparing Development Plans, boroughs should ensure the social infrastructure needs of London’s diverse communities are met, informed by a needs assessment of social</p>

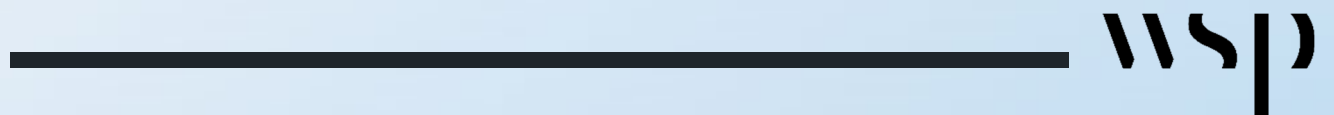
Document	Key Messages/ Issues
	<p>infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.</p> <p>Chapter 9: Sustainable Infrastructure includes:</p> <ul style="list-style-type: none"> ■ Policy SI 3 Energy infrastructure ■ Policy SI 7 Reducing waste and supporting the circular economy ■ Policy SI 8 Waste capacity and net waste self-sufficiency ■ Policy SI 9 Safeguarded waste sites ■ Policy SI 10 Aggregates ■ Policy SI 11 Hydraulic fracturing (Fracking)
<p>Mayor of London, London Environment Strategy, 2018</p>	<p>The London Environment Strategy is the first truly integrated environment strategy for London that will combine policy and action to deliver multiple benefits for Londoners. It sets out an ambitious vision for improving London’s environment. The strategy provides a holistic plan for tackling the city’s environmental challenges, to make London greener, cleaner and ready for the future.</p> <p>The strategies that comprise the London Environment Strategy are:</p> <ul style="list-style-type: none"> ■ London Plan ■ Transport ■ Housing ■ Economic Development ■ Culture ■ Health Inequalities

Document	Key Messages/ Issues
	<p>The London Environment Strategy outlines aims for 2050:</p> <ul style="list-style-type: none"> ■ Waste. London will be a zero waste city. By 2026 no biodegradable or recyclable waste will be sent to landfill and by 2030 65 per cent of London’s municipal waste will be recycled <p>Chapter 7 sets out policies and proposals for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining.</p>
<i>Local</i>	
<p>Tower Hamlets Council, ‘Don’t let our future go to waste’ Waste management strategy 2018-30</p>	<p>The six key priorities framing the waste management strategy are intended to guide a series of policies and targets to help the council achieve better services for residents, leading to a cleaner, greener Tower Hamlets. These priorities are set to remain relevant until 2030 and will be reviewed every four years alongside the reduction and recycling plan. This will allow any key legislative or policy changes to be incorporated into the strategy if necessary. The waste management strategy sets out six priorities to guide the way the council develops and improves work over the next 12 years:</p> <ul style="list-style-type: none"> ■ Collaboration at the heart of change – The more we work together, the more waste we can reduce, reuse and recycle. ■ Supporting people to love their neighbourhood – We will design services with our users in mind to encourage everyone to love their neighbourhood and take responsibility for their own waste ■ Supporting people to reduce, reuse, and recycle – We will encourage and enable everyone to follow the three R’s in their daily lives to lower our environmental impact.

Document	Key Messages/ Issues
	<ul style="list-style-type: none"> ■ Making waste a resource – We will provide opportunities for our service users to keep materials in use rather than throwing them away. ■ Reducing carbon and improving air quality – We will help improve local air quality by cutting emissions from our waste management activities. ■ Building our green economy – We will capitalise on ‘green opportunities’ for our residents and businesses where possible.
Tower Hamlets Council, Reuse, Recycling & Waste SPD, 2021	<p>The Tower Hamlets Reuse, Recycling and Waste SPD which sets out guidance for developers on how waste management should be addressed in proposals for new residential and mixed-use development. The SPD covers the entire borough and aims to re-examine and improve the way in which waste is produced and managed. The Reuse, Recycle and Waste SPD was prepared under Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>

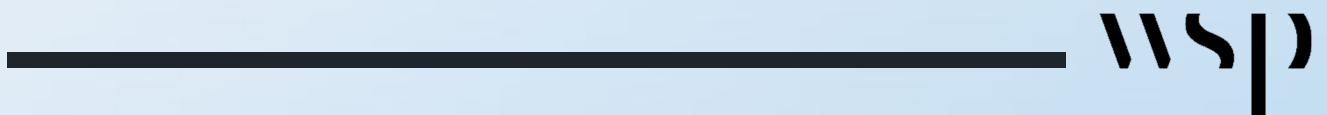
Appendix F

Assessment of Draft Policies



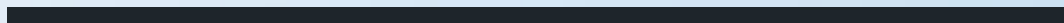
Appendix G

Assessment of Sites and Site Alternatives



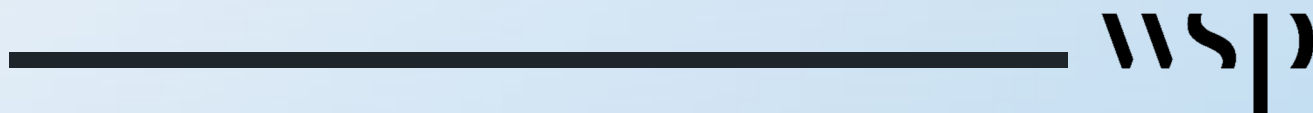
Appendix H

Equalities Impact Assessment



Appendix I

Health Impact Assessment







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London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix F - Assessment of Policies



London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix F - Assessment of Policies

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1 Introduction

1.1.1. This Appendix sets out the detailed findings of the assessment of the draft policies.

1.1.2. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 1-1** below. The performance of the draft policies against each IIA objective and **Tables 2-1 to 2-10** show the summary of significant effects based on each IIA objective.

Table 1-1 – Significance of Effect

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local / regional / national)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

2 Assessment of Draft Policies

2.1 Delivering the Local Plan

The assessment of the Delivering the Local Plan Policies are presented in **Table 2-1** below.

Table 2-1 – Delivering the Local Plan

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	L	D	L	I	P	LT	<p>Policy DV1 (areas of growth and opportunity within Tower Hamlets) requires development to provide community infrastructure, and upgrade utilities infrastructure. This will provide improved infrastructure for both the current and future populations.</p> <p>Similarly, Policy DV7 (utilities and digital connectivity) ensures sufficient infrastructure, including electricity water, sewage, and digital infrastructure, for current and future populations within development proposals.</p> <p>Policy DV6 (Social Value) aims to maximise the delivery of social value to positively contribute community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This can play a pivotal role in advancing equality.</p> <p>Similarly, Policy DV5 (Developer contributions) may also help to contribute to community project and facilities through Community Infrastructure Levy (CIL) payments.</p> <p>Policy DV8 (Site allocations) requires developers to discuss changes to social infrastructure and any alternative requirements as they arise on particular sites.</p>
IIA2: Human Health	++	M	D	R	I	P	LT	<p>Policy DV1 provides new community infrastructure, including health centres and leisure facilities. This improves healthcare provision and encourages physical activity amongst the population.</p> <p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes contributing to the development of healthy environments, encouraging physical activity and promoting good mental and physical wellbeing.</p> <p>Policy DV3 (healthy communities) requires developments to provide healthy environments for physical and mental wellbeing. This also includes the requirement for major developments to undertake a rapid health impact assessment. This is likely to result in positive developments for health and physical activity, resulting in improvements to physical and mental wellbeing amongst residents of the borough.</p> <p>Policy DV7 (utilities and digital connectivity) provides improvements to broadband infrastructure. This is likely to improve mental well-being for isolated communities.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy DV8 (Site allocations) ensures that required infrastructure is delivered on earlier phases of development as far as possible. This is likely to result in positive developments for health as access to services will be prioritised. The policy also improves health through the publicly accessible open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.
I/A3: Economy & Town Centres	++	M	D	R	I	P	LT	<p>Policy DV1 directs development proposals towards the borough's opportunity areas within the City Fringe, Poplar Riverside, Isle of Dogs and South Poplar. This is likely to boost economic investment and growth within these areas. The policy also promotes a thriving economy through supporting development within the borough's strategic industrial locations, local industrial locations, and non-designated industrial sites. There is also focus upon ensuring town centres provide a range of uses and are accessible.</p> <p>Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This could include opportunities to support local businesses and enterprises.</p>
I/A4: Employment & Skills	++	M	D	R	I	P	LT	<p>Policy DV1 protects and enhances employment locations within the borough, as well as supporting a mix of employment opportunities across the borough. This also includes promoting affordable work space, to encourage a diverse range of employment opportunities.</p> <p>Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. This will help to ensure that there will be a tangible commitment to expenditure across public, private, and voluntary, community and social enterprise sectors, generating the maximum social value across the borough. This could include opportunities to support local enterprises, businesses and training opportunities.</p>
I/A5: Housing	+	M	D	R	I	P	LT	Policy DV5 states that development proposals will be required to enter into Section 106 agreements to provide affordable housing. It also states that as vacant building credit has the potential to adversely impact the borough's ability to meet the affordable housing target, it will not apply and act as an exemption from its application in the borough.
I/A6: Crime & Safety	+	M	D	L	R	T	MT	Policy DV2 aims to empower the local community and deliver healthier, more inclusive, safer and cleaner spaces throughout the borough. Policy DV6 aims to maximise the delivery of social value to positively contribute to community benefits. An example provided by the policy includes demonstrating spatial and environmental improvement works that improve health and well-being, adopt gender inclusive design and create safer spaces.
I/A7: Sustainable Transport	+	M	D	R	I	P	LT	<p>Policy DV1 directs developments towards locations with good public and active travel links. This is likely to encourage a modal shift away from private vehicles and encourage utilisation of public and active travel. This is also encouraged through the development of green grid projects.</p> <p>Policy DV2 includes the support for developments where they contribute towards a clean and green future. This includes delivering social and transport infrastructure improvements.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A8: Accessibility	++	M	D	R	I	P	LT	<p>Policy DV1 directs developments towards locations with good public and active travel links. It also aims to improve the transport network and wider strategic and local connections. This is likely to encourage a modal shift away from private vehicles and encourage utilisation of public and active travel and support greater accessibility to the borough's services.</p> <p>Policy DV1 provides new community infrastructure, including health centres and leisure facilities. This will provide greater access to facilities and services within the borough.</p>
I/A9: Biodiversity & Natural Capital	+	M	D	R	I	P	LT	<p>Policy DV1 supports Green Grid projects which will deliver appealing walking routes (such as the Lea River Park and Whitechapel Green Spine) and associated green infrastructure across the borough. This will help to provide new green infrastructure and a variety of new habitats.</p> <p>Policy DV4 (Planning and construction of new development) requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which includes consideration for urban ecology.</p> <p>Policy DV8 (Site allocations) require development proposals on site allocations to provide new publicly accessible open space of at least 0.4ha, and where strategic publicly accessible open spaces are required, provision of at least one hectare of contiguous open space. This can contribute to habitat creation and will be of importance to habitat connectivity, assisting statutory requirements to retain and enhance biodiversity.</p>
I/A10: Landscape & Townscape	+	L	D	L	R/I	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes preserving and enhancing the character and setting of the area.</p>
I/A11: Historic Environment	+	L	D	L	R	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes not resulting in unacceptable impacts on the historic environment.</p> <p>Policy DV4 requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which includes consideration for archaeology and built heritage.</p>
I/A12: Flooding	++	L	D	L	I	P	LT	<p>Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes mitigating flood risk.</p> <p>Policy DV4 requires all major development proposals to sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which include flooding.</p>

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy DV8 includes the requirement for development in close proximity to water courses to incorporate buffer zones to support flood risk management, mitigating flood risk.
I/A13: Water Quality	+	L	D	L	R	T	MT	Policy DV4 requires all major development proposals should sign up to the Tower Hamlets Code of Construction Practice and where appropriate a constructors' forum. All construction sites in the borough should meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice as regards, which include water pollution.
I/A14: Air Quality	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes reducing the impacts of poor air quality. Additionally, zero carbon construction is likely to contribute to reduced emissions and minimisation of poor air quality associated with construction.
I/A15: Climate Change & Resilience	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes zero carbon construction, low carbon energy and heat production, this contributes to reducing the embodied carbon within developments. Policy DV7 (utilities and digital connectivity) supports decarbonised heat networks and net zero carbon emissions for energy systems. This reduces the waste heat from developments.
I/A16: GHG Emissions	+	L	D	L	R	P/T	ST/LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes utilising local goods and services, supporting low carbon energy and heat production, zero carbon construction, reducing GHG emissions. Policy DV8 (Site allocations) require development proposals on site allocations to provide new publicly accessible open space of at least 0.4ha, and where strategic publicly accessible open spaces are required, provision of at least one hectare of contiguous open space. The addition of open space can improve climate resilience and help to reduce the Urban Heat Island (UHI) effect.
I/A17: Waste	+	L	D	L	R	P	LT	Policy DV2 (delivering sustainable growth in Tower Hamlets) includes the support for developments where they contribute towards a clean and green future. This includes utilising circular economy principles and reusing and recycling of buildings and resources.
I/A18: Efficient use of Land	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> These Policies are likely to have positive in-combination effects with the majority of policies within the NLP, most notably Community Infrastructure, Town Centres and Inclusive Economy and Good Growth Policies. <p>Inter-project:</p> <ul style="list-style-type: none"> The polices are expected to have concordant outcomes with the associated London Plan Policies and will resultantly lead to positive cumulative effect for LBTH. 							

Policy Grouping	Delivering the Local Plan							
Policy Codes	DV1, DV2, DV3, DV4, DV5, DV6, DV7, DV8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> The London Plan policy D1 seeks to understand the existing context of the borough in order to inform the areas capacity and needs for growth. In doing so, the policy ensures that development will be inclusive. This aligns with policy DV2 from the NLP which seeks to contribute towards inclusive environments throughout the borough. 							
Mitigation and Enhancement Measures	No mitigation measures have been outlined for these policies. Mitigations are likely to be based on site specific information once development sites have come forward.							
HIA and EqIA Findings/ considerations	<p>EqIA</p> <ul style="list-style-type: none"> Mitigations are likely to be based on site specific information once development sites have come forward. New and improved facilities will likely be accessible and therefore beneficial to all borough residents. Consideration of social value added will ensure community, culture and diversity are upheld through development. <p>HIA</p> <ul style="list-style-type: none"> The Delivering the local plan policies outlined set out a holistic approach to the development of the NLP, and as such, are anticipated to bring about a high degree of positive effect across numerous social groups. By ensuring developers maximise contributions to the delivery of affordable housing, a greater proportion of the borough's population will be positioned to access housing. Social value contributions also include the adoption of gender inclusive design and creation of safer spaces, which will be of particular benefit to women and girls. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income. There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities. The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile. LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness There is a need to provide more greenspaces and high-quality public realm which can provide social spaces 							
Recommendations	Policy DV6 could incorporate community engagement within the policy. It is implied within the supporting text but the important role it plays in adding social value to new developments isn't overly clear.							

2.2 Homes for our Community

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-2** below.

Table 2-2 – Homes for Our Community Policies Assessment

Policy Grouping	Homes for our Community							
Policy Codes	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The policies aim to provide an appropriate mix of different sized homes, specialist and supported living, shared living and the protection of gypsy and traveller sites will help to reduce inequalities with access to housing, particularly for those in the community that are most vulnerable.</p> <p>Policy HF1 (Meeting housing needs) aims to prioritise specific groups including families with children, older people, disabled and vulnerable, key workers and service families, students and gypsies and travellers. In addition, the policy supports estate regeneration schemes that deliver homes across all tenures and provide improved social facilities, areas of high quality and multifunctional public realm and enhanced environmental amenity.</p> <p>Policy HF2 (Affordable housing and housing mix) requires development proposals to optimise the delivery of affordable housing, with the expectation of meeting the target of 50% affordable housing. The policy supports the reduction of poverty and inequalities in the borough and facilitates improvements in access to housing for low income groups.</p> <p>Policy HF9 (Housing Standards and Quality) also states that affordable housing should not be externally distinguishable in quality from private housing, which will ensure that low income groups will not be discriminated against. The policy also includes measures for wider accessibility within developments, ensuring inclusive access for all residents.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>The policies aim to provide an appropriate mix of different sized homes, specialist and supported living, shared living and the protection of gypsy and traveller sites. As housing is a social determinant of health, significant positive effects will also result.</p> <p>Policy HF4 (Supported and specialist housing and housing for older people) aims to seek opportunities to integrate the development into the wider area should also be explored to encourage a sense of belonging (especially among people from different generations) as well as to protect against the health impacts of loneliness and isolation.</p>
IIA3: Economy & Town Centres	++	M	I	R	I	P	LT	<p>The provision of new housing will benefit the local economy as the connectivity between employment centres and housing markets will be improved, and spending within the local communities will increase.</p>

Policy Grouping	Homes for our Community							
Policy Codes	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA4: Employment & Skills	+	H	D	R	R	T	MT	All policies support the provision of a variety of new housing, which will indirectly provide employment opportunities. The construction and maintenance of these housing developments will likely provide high numbers of jobs.
IIA5: Housing	++	H	D	R	I	P	LT	All policies will help to deliver at least 52,095 (+ London Legacy Development Corporation (LLDC)) new homes across the borough between 2023-2038, which exceeds the target of 34,730 new homes between 2019/20 and 2028/29. These will ensure a variety of housing will be delivered to meet the needs of all residents inclusively. In addition to the delivery of new housing, Policy HF3 (Protection of existing housing) aims to protect existing housing, particularly ensuring that the supply of self-contained homes and in particular family-sized homes is maintained. Policy HF7 and HF8 require development proposals for large-scale purpose-built shared living spaces and houses in multiple occupation (HMOs) to provide a cash-in-lieu contribution to the provision of affordable housing elsewhere in the borough. A monetary solution will be unlikely to address the issue of spatial availability in the borough and so the provision of affordable housing may be compromised in some locations by this suggestion.
IIA6: Crime & Safety	+	L	I	L	R	T	MT	Policy HF5 (Gypsy and traveller accommodation) the proposed site is suitable for housing and in an accessible, safe location. This will help to ensure the safety of this often marginalised group. Policy HF9 (Housing Standards and Quality) states that any community amenity space associated with major developments must be overlooked by habitable rooms to ensure safety and surveillance. This may help to deter crime and improve overall feeling of safety.
IIA7: Sustainable Transport	+	L	I	L	I	P	LT	Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected and in close proximity to public transport. This will help to encourage the use sustainable transport modes and reduce private car use.
IIA8: Accessibility	+	L	I	L	I	P	LT	Policy HF1 (Meeting housing needs) will help to ensure that where possible development will be in highly accessible locations along transport corridors. Similarly, Policy HF5 (Gypsy and traveller accommodation) states that development proposals must demonstrate that they are accessible in terms of location and individual mobility needs. This will help to ensure older people can remain independent. Policy HF8 (Housing with shared facilities (houses in multiple occupation)) states that developments should be located are located in an area of high transport accessibility.
IIA9: Biodiversity & Natural Capital	+/-	H	D/I	R	R/I	P/T	ST/L T	Depending upon the location of sites, there may also be temporary disturbances to habitats and species during construction. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. This could result in increases in biodiversity and natural capital through the provision of habitats and green infrastructure.

Policy Grouping		Homes for our Community						
Policy Codes		HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/L T	There is potential for housing developments to detract from the landscape and townscape, through land take and poor design. Depending upon the location of sites, there may also be temporary loss to the setting and tranquillity of some areas of the borough which have high landscape and townscape values, from dust, construction traffic, noise and vibration. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. If sensitively designed this could help to improve the setting of the local landscape and townscape adding to its value.
I/A11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>There is potential for housing developments to result in the loss of heritage assets (designated, non designated and buried archaeology), through land take as well as possible degradation from poor design. Depending upon the location of sites, there may also be temporary disturbances to the setting of heritage assets during construction from dust, construction traffic and noise and vibration. However, Policy HF1 (Meeting housing needs) states that it will ensure a higher quality of built environment will be provided both off-site and on-site, through the delivery of public realm and green spaces. If sensitively designed this could help to improve the setting of the local historic environment adding to its value.</p> <p>Policy HF5 (Gypsy and traveller accommodation) is the only policy that ensures that developments employ high quality design and are sympathetic to local character and heritage. It is not clear whether other sites will also have the same level of consideration to the historic environment. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented, though it is expected that they will be single storey in nature and should not impact greatly on the setting of neighbouring heritage assets.</p>
I/A12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	Policy HF5 (Gypsy and traveller accommodation) is the only policy that ensures that developments are located away from areas of high flood risk (flood zone 3). It is not clear whether other sites which may come forward as a result of these policies will have the same considerations. Urban intensification and additional housing in the borough could increased flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.
I/A13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A14: Air Quality	+/-	M	D/I	R	R/I	P/T	ST/ LT	Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected to public transport. This will help to encourage the use sustainable transport modes and reduce private car use. Allowing residents to live more locally may also reduce emissions and improve overall air quality. The inclusion of parks and green spaces as per Policy HF1 will also help to improve air quality. However, construction of housing is likely to result in temporary worsening of air quality during construction.

Policy Grouping		Homes for our Community						
Policy Codes		HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	+	L	I	L	I	P	LT	<p>Policy HF1 (Meeting housing needs) aims to create sustainable places and quality living environments, however, it is not clear whether this will ensure climate resilient design.</p> <p>Policies HF1, HF4, HF6, HF7 and HF8 ensure that new development should be sited in locations that are well-connected to public transport. This will help to encourage the use sustainable transport modes and reduce private car use. Allowing residents to live more locally may also reduce emissions and improve. The inclusion of parks and green spaces as per Policy HF1 (Meeting housing needs) will also help to reduce levels of overheating within the borough.</p>
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	The development of housing is likely to result in significant levels of embodied carbon. Policy HF1 (Meeting housing needs) aims to create sustainable places and quality living environments, however, it is not clear whether this will include measure that will reduce GHG emissions and include renewable energy generation. As many of these measures will be determined by scheme level design, uncertain effects have been identified.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Housing development proposals which will come forward as a result of these policies are likely to be resource intensive and could generate a significant amount of construction waste. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
IIA18: Efficient use of Land	+/-	H	D	R	I	P	LT	As stated in Policy HF1 (Meeting housing needs), although housing growth will be primarily focused in the locations which may result in the repurposing of some land, the borough's limited area requires optimising delivery capacity where opportunities arise, which will be achieved by the regeneration of previously developed land, the intensification of the built form in opportunity areas.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There is potential for negative cumulative and synergistic effects on biodiversity, landscape and townscape, historic environment, air quality, GHGs, flooding and efficient use land if multiple developments were to come forward. These may conflict with policies PS6, PS7, PS8, BO1, BO2, CG1 and CG9. Cumulative increases in hardstanding which surfaces may also increase flood risk within the borough. Multiple housing developments are also likely to be resource intensive and significantly increase levels of embodied carbon as well as emissions associated with construction. The delivery of housing is likely to have positive effects in combination with policy DV1 and DV2. <p>Inter-plan:</p> <ul style="list-style-type: none"> Positive cumulative effects are expected to arise from the London plans policy on housing quality (D6) and the NLPs housing standards and quality policy (HF9). Housing that is fit for purpose is at the forefront of both polices, with HF9 setting out the requirements for space and accessibility standards as provided by the London Plan itself. Included in this is requirements for private internal space, access to external open space, and adequate daylight and privacy. housing in the NLP aligns with policy D7 in the London Plan. Both seek to provide housing that is genuinely suitable for London's diverse population, including at least 10% if dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. The positive cumulative effects of these policies will aid the borough population in need of specialist housing including the elderly and disabled groups. A strong focus on play and recreational space across both the London Plan and NLP will drive positive cumulative effects. The shared aim for residential developments to incorporate good-quality, accessible play provision within policy HF1 and S4 will generate positive effects for the greenspace accessibility of residents throughout the borough. 							

Policy Grouping	Homes for our Community							
Policy Codes	HF1, HF2, HF3, HF4, HF5, HF6, HF7, HF8, HF9							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> There is the potential for negative cumulative effects to arise on housing in combination with London Plan 2021 policies. London Plan Policy SD5 does not promote the provision of off-site affordable housing or cash-in-lieu contributions, unless under exceptional circumstances; conflicting with NLP Policies (HF7 and HF8). 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible. Mitigation for IIA11 is likely to be offered by proposed Policy PS6 which aims to reduce the potential impacts on the historic environment. Mitigation for IIA12 is likely to be offered by proposed Policy CG6 which aims to manage flood risk from all sources. 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> The emphasis on affordable family sized housing with a view to combat overcrowding in the borough is also beneficial to families with children. Estate regeneration should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out. The provision of specialist housing to offer supported living to those with additional needs will support a range of protected characteristics in the borough. <p>HIA</p> <ul style="list-style-type: none"> The policies are anticipated to bring about a high degree of positive effect across numerous social groups. Social cohesion is highly supported by this theme. Regeneration as well as new provision is required to provide residents with a high-quality built environment, including access to community facilities. The requirement of development proposals to maximise the delivery of affordable homes under this theme will be especially beneficial to the health and wellbeing of low-income groups who are reliant on affordable housing. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> There is significant need for affordable properties to buy and rent, however, rising costs of living and above average house prices are affecting the number of residents able to afford to buy. There are significant levels of overcrowding in the borough The Covid-19 pandemic and rising cost of living is increasing levels of homelessness. The lack of affordable housing means that young people and/or lower income groups are missing out. 							
Recommendations	<ul style="list-style-type: none"> It should be noted that the Decent Home Standard is currently applicable to the social rented sector whilst the Decent Homes Standard in the private rented sector is undergoing consultation. More information could be provided on what the policies mean by 'sustainable' residential development i.e., does this include renewable energy regeneration, use of sustainable materials, well located to sustainable transport etc. Policy HF5 (Gypsy and traveller accommodation) is the only policy that makes ensures that developments employ high quality design and is sympathetic to local character and heritage - this should also be included in Policy HF1. 							

2.3 Clean, Green Future

The assessment of the Clean, Green Future Policies are presented in **Table 2-3** below.

Table 2-3 – Clean, Green Future Policies Assessment

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	L	I	R	R	P	LT	The Clean and Green Future policies will help to provide adaptation and mitigation measures which will support the borough's population both now and in the future. Provision energy efficient buildings (CG2 Low energy buildings, CG3: Low carbon energy and heating) and retrofitting (CG4 Embodied carbon, circular economy and retrofit) will help to support better quality housing stock and present energy/ cost savings for residents.
IIA2: Human Health	++	L	D/I	L	R	P	LT	Provision energy efficient buildings (CG2 Low energy buildings, CG3 Low carbon energy and heating) and retrofitting (CG4 Embodied carbon, circular economy and retrofit) will help to improve residents' health by reducing exposure to cold and air pollutants, as well as overheating within developments. Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living. Policy CG10 (noise and vibration) contributes to indirect positive effects on wellbeing through a reduction in noise within Tower Hamlets. Reductions in noise reduce the nuisance to residents, improving mental wellbeing. Policy CG11 (contaminated land and storage of hazardous substances) also acknowledges the risks that contaminated land poses to human health. This policy includes remediation measures for contaminated land and restrictions to hazardous substance use, preserving human health.
IIA3: Economy & Town Centres	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA4: Employment & Skills	+	L	I	L	R	T	MT	Design requirements as part of the Clean and Green policies could indirectly result in job opportunities particularly within the construction and renewable energy sectors.
IIA5: Housing	+	L	I	L	I	P	LT	Generally, policies within Clean and Green Future will indirectly contribute to improved housing quality within the borough, through higher quality building standards during construction, including through additional noise reduction measures, heating measures and climate resilience measures.
IIA6: Crime & Safety	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA7: Sustainable Transport	+	L	D	R	R	P	MT	Policy CG9 (air quality) outlines the promotion on low and zero emissions transport. The supporting policy text also includes the encouragement of sustainable movement patterns, this is likely to include the use of public and active transport modes. Additionally, the policy promotes the use of electric vehicles.
IIA8: Accessibility	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A9: Biodiversity & Natural Capital	++	L	I	L	R	P	MT	<p>Policy CG9 (air quality) contributes to indirect positive effects upon biodiversity through improvements to air quality, improving the environment for species and habitats. The policy also includes utilising nature-based solutions to reduce air pollution. This will also contribute to increasing the biodiversity within the borough as well as protecting existing habitats from the adverse effects of air pollution.</p> <p>Additionally, Policy CG10 (noise and vibration) includes measures to minimise disturbance from new construction, this is likely to have minor positive indirect effects on local biodiversity.</p>
I/A10: Landscape & Townscape	+	L	I	L	R	P	MT	<p>Policy CG6 aims to include nature-based drainage systems and planted landscapes, which in addition to natural flood they can provide positive landscape features within the borough.</p> <p>Policies CG9 and CG10 encourages developments which will mitigate and improve poor air quality and reduce exposure to noise and vibration. Both noise and air pollution can contribute to reductions in tranquillity and the setting of townscapes and landscapes.</p>
I/A11: Historic Environment	+	L	I	L	R	P	MT	<p>The improvements to air quality outlined in Policy CG9 (air quality) contribute to indirect positive effects upon the historic environment as poor air quality contributes to the degradation of heritage assets. Therefore, improving air quality is likely to reduce degradation of assets within Tower Hamlets.</p>
I/A12: Flooding	++	M	D	R	I	P	LT	<p>Policy CG6 (flood risk) within Clean and Green Future addresses flood risk within the borough and sets out the requirements for developments that may occur within flood zones, including flood risk assessments and the restriction of highly vulnerable uses within flood zone 3a and 3b.</p> <p>The policy also sets out requirements for developments to include flood risk mitigation measures, improving resilience in flood events.</p> <p>Policy CG7 (sustainable drainage) also contributes to reducing flood risk through the implementation of SuDS and greenfield run-off rates, as well as reducing surface water run-off.</p>
I/A13: Water Quality	++	L	I	R	R	P	MT	<p>Policy CG8 requires development proposals to seek to reduce the pressure on the fresh and wastewater systems through reducing demand and increasing water efficiency. Conserving water can help to reduce the risk of environmental pollution, improve water quality and also save energy.</p> <p>Inclusion of SuDs as per CG7 can also help to improve water quality, as they mimic natural drainage regimes and reducing the transport of pollution to the water environment. This policy also supports proposals for zero discharge developments.</p>
I/A14: Air Quality	++	M	D	R	R/I	P	MT/LT	<p>Policy CG9 (air quality) addresses the poor air quality within the borough and the need for developments to mitigate and improve air quality, including promoting low or zero emission transport and reducing vehicle reliance. This is likely to contribute to improvements to air quality within the borough.</p>

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	++	M	D	R	I	P	LT	All policies within Clean and Green Future contribute to improving the climate resilience within the borough, particularly CG1 (Mitigating and adapting to a changing climate), CG5 (overheating), CG6 (which acknowledges the impact of climate change on flood risk). Climate change is likely to result in increased heating and rainfall events, therefore these policies increase the resilience to this through prevention of overheating and the consideration of flood risk within developments, including the implementation of SuDS.
IIA16: GHG Emissions	++	M	D/I	L	I	P	LT	The majority of policies within Clean and Green Future contribute to reducing GHG emissions through the reduction in energy usage, and vehicle reliance. Policy CG3 (low carbon energy and heating) also contributes to positive effects due to reductions in fossil fuel usage. Policy CG4 also contributes to reductions in embodied carbon.
IIA17: Waste	++	L	D	L	R	P	MT	Policy CG4 will require all major development proposals to demonstrate how waste will be minimised in the design and construction of the building, through reuse of materials on-site or ensuring new materials are sustainably sourced and low impact. The policy also encourages circular economy approaches within design and construction. Policy CG1 aims to support development proposals which minimise the use of natural resources, by promoting more efficient use of materials in the construction process in line with the principles of the circular economy, minimising waste and consumption throughout the lifecycle of a building.
IIA18: Efficient use of Land and Resources	++	L	D	R	I	P	LT	Policy CG11 (contaminated land and storage of hazardous substances) outlines the requirements to remediate contaminated land. This is likely to improve the quality of land within Tower Hamlets and contribute to the utilisation of brownfield land. Policy CG1 aims to support development proposals which minimise the use of natural resources, by promoting more efficient use of materials in the construction process in line with the principles of the circular economy, minimising waste and consumption throughout the lifecycle of a building.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are potential positive cumulative effects upon air quality, human health, housing, and climate change in conjunction with other policies. This is likely to result in improved air quality, and improvements to housing standards within the borough. There are also potential positive cumulative improvements to biodiversity, in conjunction with Biodiversity and Open Space policies. <p>Inter-plan:</p> <ul style="list-style-type: none"> Positive cumulative effects are expected from the overlapping requirements of the Clean, Green Future policies and the London Plan Policy SD1 on Opportunity Areas. Opportunity Areas are identified by the London Plan as significant locations with development capacity to accommodate housing, infrastructure and commercial development. The identification of such areas and the significant effect they have the potential to enact allows for the promotion of clean green principles in their development in order to support sustainability in the borough. This includes the development of brownfield sites in order to make the best use of land available. 							
Mitigation and Enhancement Measures	No mitigation or enhancement measures have been identified for these policies.							

Policy Grouping	Clean and Green Future							
Policy Codes	CG1, CG2, CG3, CG4, CG5, CG6, CG7, CG8, CG9, CG10, CG11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> • Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers. <p>HIA</p> <ul style="list-style-type: none"> • In general, Clean Green Future results in positive impacts upon health determinants. There are a number of resulting beneficial health effects, particularly upon older people, infants, children and young people including care leavers, people with long term health conditions and low-income groups. 							
IIA Issues addressed	<ul style="list-style-type: none"> • Increases in light, air, and noise pollution from increasing development in the borough • Frequent heat episodes as a result of climate change can contribute to the worsening of air quality • Climate change is likely to increase the occurrence of flooding from all sources • The impacts of the UHI generated in will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households • There is the need to reduce GHG emissions of new infrastructure and housing • There is a need to ensure climate resilience of the infrastructure in LBTH • Increasing population projections in the borough will increase demand for drinking water supply and place pressure on the already stressed capacity of sewer systems 							
Recommendations	<ul style="list-style-type: none"> • Policy CG4 Part 6 could be clearer on retrofitting proposals as it is not clear what developments these actually apply to - are these only applied to those undergoing redevelopment or applied to all existing housing stock? • Policy CG6 Part 8 could be reworded to '<i>Nature based solutions such as natural drainage systems and planted landscapes...</i>' • Policy CG9 could benefit from including the promotion of public or active travel modes within the policy, rather than just stating electric vehicles or sustainable movement patterns. 							

2.4 People, Places and Spaces

The assessment of the People, Places and Spaces Policies are presented in **Table 2-4** below.

Table 2-4 – People, Places and Space Policies Assessment

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	I	P	LT	<p>Policies within People Places and Spaces contribute to significant positive effects upon IIA1. PS1 (Design and Infrastructure Led Approach to Development) results in positive effects on communities as the policy supports the borough's growing population. Additionally, the policy outlines community engagement measures to ensure development suits community needs, and gender inclusive design.</p> <p>Policy PS5 (creating inclusive places) results in positive effects through improvements to equalities, ensuring all genders are able to access community spaces equally.</p> <p>Additionally, Policy PS4 (Attractive Streets, Spaces, and Public Realm) provides a range of public spaces for community use within developments. This improves the local facilities available for growing communities in the borough.</p>
IIA2: Human Health	++	M	D/I	R	I	P	LT	<p>Policy PS2 (tall buildings) indirectly improves health through the communal open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.</p> <p>Policy PS3 (Securing Design Quality) aims to ensure that developments do not result in unacceptably harmful impacts arising from overheating, wind, air pollution, light pollution noise pollution, or odours. All of these aspects can have harmful effects on human health, therefore reducing harmful impacts will have positive effects on the health of neighbouring populations. Additionally, the policy ensures developments consider the health and wellbeing of all users, including vulnerable people, throughout the design process. This further aids in reducing harmful impacts of development.</p> <p>Policy PS5 (creating inclusive places) includes measures for well-designed open spaces, which are accessible to all genders. This is likely to benefit health through reducing isolation of genders, for example mothers, and provide space for socialisation and activity outside, improving physical and mental health.</p>
IIA3: Economy & Town Centres	+	L	D	L	R	P	MT	<p>Policy PS9 (shopfronts) outlines the need for active shopfronts which will help to improve the economic diversity within the borough and encourage multi-use shopfronts, building the local economy. This is also reinforced by a number of other policies within the grouping.</p>
IIA4: Employment & Skills	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA5: Housing	+	L	D	R	I	P	LT	<p>Policy PS3 is likely to result in improved housing, particularly through improvements to privacy for residents, creating more habitable rooms and provision of a mix and range of communal and publicly</p>

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								accessible open spaces and water spaces. Policy PS2 supports the development of tall buildings, which could present opportunities to deliver greater housing densities.
IIA6: Crime & Safety	++	M	D/I	R	R	P	MT	<p>A number of policies within this group provide improvements to safety both directly and indirectly. Generally, they support public realm and high quality design which can engender a sense of pride in a place, which in turn can help to discourage crime.</p> <p>Policy PS2 (tall buildings) considers public safety within the design of tall buildings, including through evacuation routes.</p> <p>Policy PS4 incorporates secured by design principles which will help to improve safety and perception of safety for pedestrians. Additionally, the policy encourages a healthy streets approach. As part of this the 'people feel safe' indicator will help to ensure that whole community should feel comfortable and safe at all times and people should not feel worried about road danger or experience threats to their personal safety.</p> <p>Policy PS5 also includes lighting and signage measures, as well as design to make areas safe for all genders, particularly reducing the fear of crime.</p>
IIA7: Sustainable Transport	+	L	I	L	R	P	MT	Policy PS4 encourages better connectivity and permeability around sites, encouraging people to easily and safely get around the borough. It encourages connectivity to public transport hubs, town centres, open spaces, employment and community facilities. This could help to reduce the demand for use of private vehicles and facilitate a modal shift to more sustainable modes.
IIA8: Accessibility	++	L	D	R	R	P	MT	Policy PS4 outlines the requirements for development to maintain accessible street networks and enhance connectivity through developments. This includes connectivity to public transport hubs and improving accessibility around the borough. The application of the 'healthy streets' approach will ensure that public places are accessible for all.
IIA9: Biodiversity & Natural Capital	+	L	D	L	R	P	LT	<p>Policy PS2 requires new development to provides communal open space which may enhance local natural capital. The policy also requires development to have no adverse effect on biodiversity in the local area, preserving species and habitats.</p> <p>PS4 encourages tree planting and the maximisation of planting and soft landscaping to provide visual and environmental relief from hard landscaping. This is likely to provide small scale habitat creation and ecological networks.</p>
IIA10: Landscape & Townscape	++	H	D	R	R/I	P	LT	<p>There are a number of policies within this group that contribute to significant positive effects on IIA10. Policies PS1 and PS2 requires the appropriate scale of new developments, this will protect the borough's landscape and views.</p> <p>Policies PS3 and PS4 support high quality design, the creation of attractive streets, spaces and public realms, as well as active frontages. This contributes to improved landscape and townscape within the borough and an improved streetscape value.</p>

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>Policy PS8 requires the management of key views within the borough. The policy also ensures the value of landmarks are protected. This means that new development is unlikely to negatively impact the local landscape and views.</p> <p>Policy PS9 also requires active shopfronts, which positively contributes to the local townscape.</p>
I/A11: Historic Environment	++	M	D	R	R	P	LT	Policy PS6 specifically outlines the preservation and enhancement of designated and non-designated heritage assets, including archaeological areas and heritage at risk. However, the policy will under some circumstances allow the loss of heritage assets if they meet a stringent criterion. Policy PS7 (world heritage sites) also requires the safeguarding of the two world heritage sites within the borough, resulting in positive effects.
I/A12: Flooding	+	L	I	L	R	P	MT	Supporting text for Policy PS1 states that a design led approach will question whether proposals be built to meet high sustainability standards, and to maximise green spaces and effectively manage flood risk. General improvements to the public realm. Policy PS4 aims to ensure that all new streets contain trees and maximise planting and soft landscaping to provide visual and environmental relief. This could help to intercept rainfall and decrease surface run-off.
I/A13: Water Quality	+	L	I	R	R	P	MT	<p>Policy PS3 supports efficient design, which could include water efficiency, however, this isn't necessarily clear. Supporting water efficient design can help to reduce the risk of environmental pollution, improve water quality and also saves energy. Policy PS2 requires new developments of tall buildings to have no adverse effect on water bodies, which is likely to maintain current water quality.</p> <p>PS4 encourages tree planting and the maximisation of planting and soft landscaping to provide visual and environmental relief from hard landscaping. This is likely to help indirectly improve water quality as trees, shrubs, ground cover and other plants can help filter out pollutants and reduce the amount of pollution that is washed into surface water bodies.</p>
I/A14: Air Quality	+	L	I	R	R	P/T	MT	Policy PS3 (part f) states that use design and construction techniques to ensure that the development does not result in unacceptably harmful impacts arising from air pollution. Policy PS2 requires new development to provide communal open space which may enhance local natural capital. Urban greening will help to support air purification and dust suppression which could help to reduce levels of air pollution within the borough.
I/A15: Climate Change & Resilience	+	L	D	R	I	P	LT	Policy PS3 requires the high-quality design of new developments, including the resilience to overheating. This is likely to contribute to improving the resilience of new developments to heating as a result of climate change. Supporting text for Policy PS1 states that a design led approach will question whether proposal be built to meet high sustainability standards, and to maximise green spaces and effectively manage flood risk. General improvements to the public realm. Policy PS4 aims to ensure that all new streets contain trees and maximise planting and soft landscaping to provide visual and environmental relief. Tree planting and green infrastructure can help to reduce the urban heat island effect.

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	+	L	D	L	I	P	LT	Policy PS3 supports the optimisation energy and waste efficiency, which could help to reduce GHG emissions. Part 11 of Policy PS6 aims to retrofit heritage assets to achieve greater levels of energy efficiency and reductions in carbon emissions.
IIA17: Waste	+	L	D	L	I	P	LT	Policy PS4 requires integrated refuse and recycling within new developments. This would contribute to encouraging recycling within new developments, and waste management within the borough.
IIA18: Efficient use of Land and Resources	+	M	D	R	I	P	LT	Policy PS2 supports the development of tall buildings, which can make efficient use of land by delivering greater housing densities and could reduce pressure on the borough's green spaces. Policy PS3 (part d) supports the use of high-quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development.
Potential Cumulative/Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are potential for cumulative effects upon IIA15, IIA10 and IIA11 when applied in combination with other policy groups such as Biodiversity and Open Space. There is potential for improved resilience to overheating, positively affecting IIA15. There are also likely to be cumulative improvements to the townscape within the borough, improving streetscape value, as a result of positive development design improving the public realm. This is likely to have positive effects in combination with the Town Centre, Biodiversity and Open Space and Community Infrastructure Policies. There are also positive cumulative effects upon IIA1 (population and equalities) through improved design and accessibility of developments, providing for the current and future population. <p>Inter-plan:</p> <ul style="list-style-type: none"> Positive cumulative effects are anticipated through the London Plan policy D9 on tall buildings and the equivalent NLP policy PS2, tall buildings. Both policies are geared towards selecting appropriate locations for the development of tall buildings, doing so in a way that avoids adverse visual impacts and fits into the spatial hierarchy of the borough. This Will work to ensure housing provision does not compromise the environment, and instead continues to protect and improve the townscape of the borough. Safety is also a key consideration in both the London Plan and the NLP. Design Out Crime initiatives working across both policies will result in positive cumulative effects for borough residents. 							
Mitigation and Enhancement Measures	No mitigation or enhancement measures have been identified.							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users. Securing design quality should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out. Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered. <p>HIA</p> <ul style="list-style-type: none"> The policies proposed within the People, Places and Spaces theme have the potential to result in positive health effects upon multiple social groups, primarily through improving housing provision within LBTH. Improved quantity and quality of housing as well as associated access to open space will contribute positively to the physical health and wellbeing of the LBTH population. 							

Policy Grouping	People Places and Spaces							
Policy Codes	PS1, PS2, PS3, PS4, PS5, PS6, PS7, PS8, PS9, PS10, PS11							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> • Frequent heat episodes as a result of climate change can contribute to the worsening of air quality • The impacts of the UHI generated in will increase as development increases, exacerbating health issues and reduce quality of life in overcrowded households • There is the need to reduce GHG emissions of new infrastructure and housing that is required to accommodate prosperity and population growth within LBTH. • There is a need to ensure climate resilience of the infrastructure in LBTH. The extent of future climate change will be strongly affected by the amount of GHG that the population chooses to emit. • There are significant health inequalities in LBTH. This is reflected in the variation of life expectancies between the most and least deprived residents. • There is a need to provide more greenspaces and high-quality public realm which can provide social spaces 							
Recommendations	<ul style="list-style-type: none"> • Policy PS5 (part G) it may be more inclusive to include all local groups and genders rather than specifically women. Policy supporting text could also include further statistics on LGBTQIA+ communities as it is currently quite focused on male and female genders. Additional reference could be made to the Tackling Violence Against Women and Girls Strategy (2021) and Inclusive Spaces and Places for Girls and Young People, An Introduction for Local Government (2023). • Policy PS1, PS3 and PS4 could incorporate elements of climate resilient design. This could include specific aspects such as rainwater and flood attenuation, SuDs, permeable paving, green roofs etc. Reference could also be made to urban creep. • PS3 touches on efficiency as part of design - this could be strengthened by inclusion (either within the policy or supporting text) on what type of efficiency measure these could include i.e. water efficient measures, energy efficient measures etc. 							

2.5 Inclusive Economy and Good Growth

The assessment of the Inclusive Economy and Good Growth Policies are presented in **Table 2-5** below.

Table 2-5 – Employment and Economic Growth Assessment

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	R	I	P	LT	<p>Policy EG1 (creating investment and jobs) includes closing the skills gap amongst the working population, improving equalities. The policy also includes affordable workspace, which provides opportunities for smaller, local businesses.</p> <p>Policy EG3 (affordable workspace) also supports those who may have smaller, local businesses, through affordable workspace. This is also likely to provide opportunities for different cultures, improving equalities. Supporting policy text also aims to support disadvantaged groups starting up in any sector</p> <p>Policy EG5 (railway arches) also improves equalities by preserving the railway arches for their current cultural uses, enabling different communities to have economic and employment space within the borough.</p>
IIA2: Human Health	+	L	I	R	I	P	LT	<p>All policies indirectly support human health. There is clear evidence that good employment improves health and wellbeing across people’s lives, not only from an economic standpoint but also in terms of quality of life.</p> <p>Policy EG1 (creating investment and jobs) results in indirect positive effects on human health. The policy closes the skills gap through improving local education levels. Improving education is likely to result in increased opportunities and positive effects on mental wellbeing.</p>
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	<p>All policies within Employment and Economic Growth contribute to increasing the economic growth within the borough.</p> <p>Policy EG1 (creating investment and jobs) provides a range of workspaces and employment locations. This also improves transport connectivity to employment opportunities. Developing new employment locations promotes growth within the borough.</p> <p>Policy EG2 (new employment space) also contributes to encouraging investment within the borough from businesses utilising the new employment space.</p> <p>Policy EG3 (affordable workspace) also encourages the investment of smaller businesses within the borough. Small business investment in Tower Hamlets encourages diversity of the economy and additional opportunities for economic growth.</p> <p>Policy EG5 (railway arches) also encourages a diverse economy within Tower Hamlets, preserving the industrial economy located in these areas, as well as food and drink, arts and culture that are located in these areas.</p> <p>Policy EG6 (data centres) provides increased provision for employment uses within Tower Hamlets.</p>

Policy Grouping		Inclusive Economy and Good Growth						
Policy Codes		EG1, EG2, EG3, EG4, EG5, EG6						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA4: Employment & Skills	++	H	D	R	I	P	LT	<p>All policies within Employment and Economic Growth contribute to increasing the number of employment opportunities within the borough. Policy EG1 (creating investment and jobs) provides improved job opportunities for all groups of the working population, including those with current low levels of education. The policy also provides jobs across the borough, providing jobs for a range of communities.</p> <p>Policy EG2 (new employment space) also creates new spaces for employment opportunities, increasing the number of jobs available within Tower Hamlets.</p> <p>Policy EG5 (railway arches) preserves railway arches within the borough. The railway arches provide employment opportunities for a range of sectors, namely industrial, food and drink, and arts and cultural employment opportunities.</p>
IIA5: Housing	-	M	I	L	I	P	LT	<p>The designation of Strategic Industrial Locations will protect the supply of space in Tower Hamlets for industrial usage. In doing so, other land uses such as housing will face competition for development within the borough. The protection and growth of Strategic Industrial Locations could, therefore, threaten the boroughs housing pipeline.</p>
IIA6: Crime & Safety	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA7: Sustainable Transport	++	M	D	R	R/I	P	LT	<p>Policy EG1 indirectly promotes sustainable transport by ensuring that the benefits of the Elizabeth line are a catalyst for growth within the borough. This is likely to encourage workers to utilise this line, and tube transportation, in order to access employment opportunities and economic opportunities within Tower Hamlets, resulting in positive effects.</p> <p>Policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 also ensures that active travel modes of walking and cycling are investigated within new developments involving railway arches. This encourages the use of sustainable transport access to areas, through improved walking and cycling facilities in these areas.</p> <p>All policies will help to reduce reliance upon the private vehicles and contribute to a modal shift.</p>

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A8: Accessibility	+	M	D	R	I	P	MT	<p>Policy EG1 improves accessibility to jobs through the location of the borough's employment locations. The locations of these employment sites are located with considerations given to access to all, including through public transport.</p> <p>Policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 includes measures to ensure the accessibility to the railway arches by walking and cycling must be included within developments. This contributes to positive effects on accessibility due to walking permeability through the area, allowing those who rely on active and public transport modes, such as those on low incomes, to reach the area.</p>
I/A9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for some habitats to be lost as a result of the implementation of these policies. However, at this stage it is not clear where new development may come forward, therefore uncertain effects have been identified.
I/A10: Landscape & Townscape	+/-	L	D	L	I	P	LT	<p>Mixed positive and negative effects have been identified as there is potential for new employment developments to impact the local townscape and landscape setting.</p> <p>However, Policy EG2 requires that new employment space should contribute towards integrated place making, resulting in positive effects on the local townscape. Policy EG5 also ensures the preservation of railway arches and seeks for railway arches to make a positive contribution to the function of the area, improving the local townscape character and public realm.</p>
I/A11: Historic Environment	+/-	L	I	L	R/I	P	MT	<p>Mixed positive and negative effects have been identified as there is potential for new employment developments to impact the setting of local heritage assets if not sensitively designed.</p> <p>However, the positive placemaking proposed in policy EG2 may result in positive effects on the setting of local heritage assets. This is likely to be determined by individual schemes that may come forward. Policy EG5 also ensures the preservation of railway arches, which are a key heritage asset within the borough. This policy seeks for railway arches to make a positive contribution to the function of the area, improving the local character and public realm.</p>
I/A12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	Urban intensification and additional employment developments could increase flood risk due to more hard standing surfaces. However, exact details of these impacts will depend on the scheme level designs which come forward and mitigation measures implemented.
I/A13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A14: Air Quality	+/-	M	D	R	R/I	P/T	LT	The construction of new employment developments may temporarily negatively affect air quality due to plant emissions and dust.

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>However, policy EG2 aims to support development proposals for new employment space in town centres with good public transport accessibility or along major transport routes.</p> <p>Policy EG5 also ensures that active travel modes of walking and cycling are investigated within new developments involving railway arches. This encourages the use of sustainable transport access to areas, through improved walking and cycling facilities in these areas.</p>
IIA15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of embodied carbon. As the number of developments and the detailed design is not currently available, uncertain effects have been identified.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. As the location of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
IIA18: Efficient use of Land and Resources	+	M	D	L	D	P	MT	Policies aim to protect existing employment floorspace and states that potential additional capacity exists within designated employment locations through the intensification of existing provision. This could help to make best use of existing land. Policy EG5 will also make good use of existing railway arches.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are opportunities for positive cumulative effects on the economy and employment from the increase in employment and economic growth across the borough. There are also potential cumulative effects upon sustainable transport due to the encouragement of a modal shift towards public and active travel modes. Potential positive cumulative effects are also anticipated for population and equalities due to improved opportunities and resources for current and future populations, including employment opportunities and improved education, meeting community needs. Positive cumulative effects are likely in combination with the Town Centre policies. <p>Inter-plan:</p> <ul style="list-style-type: none"> A high level of positive cumulative effects is expected resulting from the synergy of London Plan and NLP policies relating to Inclusive Economy and Good Growth. Both policies strive to provide suitable business spaces, including flexible and hybrid working spaces. These spaces are likely to be well suited to SME's and small independent businesses in both growing sectors and creative businesses looking to set up in the borough. Importantly, the affordability of workspaces is stressed by both the NLP and London Plan, including those targeted towards start-up and early stage businesses. Positive cumulative effect will be resultant of efforts towards ensuring a wide range of economic opportunities all to make the borough fairer, and more inclusive. Finally, both policies put forward plans to improve digital connectivity. Positive cumulative effects of enhanced broadband throughout the borough and assurance that connectivity will meet growing demands of development will be felt by all borough residents. 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Mitigation to loss in housing is likely to be solved by the application of housing policies. Mitigation measures for IIA9, IIA10, IIA11 and IIA12 are likely to be based on site specific information once development sites have come forward, but positive placemaking and inclusion of green spaces/ small habitats could help to alleviate negative effects. 							

Policy Grouping	Inclusive Economy and Good Growth							
Policy Codes	EG1, EG2, EG3, EG4, EG5, EG6							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). Mitigation for IIA12 is likely to be offered by proposed Policy CG6 which aims to manage flood risk from all sources. 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> Jobs creation must be evenly distributed across space within the borough to ensure all groups are able to easily access employment. New employment spaces should be a diverse and equal mix of office space and spaces for small businesses to thrive. The accessibility of disabled groups must also be considered when ensuring the walkability of the area. Footpaths must not be obstructed to allow space for wheelchair users to travel through. <p>HIA</p> <ul style="list-style-type: none"> The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough's employment spaces. The policies also supports the provision of education and upskilling opportunities throughout the borough. In doing so the current skills gap amongst the working population will likely diminish and a wider range of jobs will be accessible to a greater proportion of the population. The protection and growth of Strategic Industrial Locations could, threaten the boroughs housing stock. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> LBTH is a major location for employment in London, attracting a large daytime population of employees. Compared to London and Great Britain, LBTH has a larger proportion of residents of working age, of which a similar amount is employed. It is important to continue to support the role of LBTH as a major attractor of employment and economic functioning, whilst encouraging the resident population to seek opportunities in the borough. 							
Recommendations	<ul style="list-style-type: none"> Inclusive Economy and Good Growth policies would benefit from including additional notes to the development of town centre economies and the preservation of these areas. 							

2.6 Town Centres

The assessment of the Town Centre Policies are presented in **Table 2-6** below.

Table 2-6 – Town Centre Policies Assessment

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	R	P	LT	<p>Policy TC1 (Supporting the network and hierarchy of centres) includes community uses within town centres. This provides facilities for the community and is likely to suit community needs. It sets out plans for Whitechapel to become a civic hub for the borough through the new Town Hall and provide a concentration of health-related community services</p> <p>Policy TC2 (Protecting the diversity, vitality and viability of our town centres) also preserves retail uses within town centres, providing services and amenities for local communities.</p> <p>Policy TC7 (Evening and night time economy) also includes the development of 24 hour shops in close proximity to the borough's centres with night workers (Whitechapel and Brick Lane). This not only provides amenities for the local community but it also ensures that services are more widely available to those workers in the night-time economy who cannot access them during normal business hours.</p>
IIA2: Human Health	+	L	I	R	R	P	MT	<p>All policies help to support social cohesion across the borough, encouraging opportunities for social interaction between community members.</p> <p>Policy TC1 indirectly improves health through providing areas for socialisation, entertainment and culture. This contributes to improving mental wellbeing. There is potential for negative effects on the mental wellbeing of local residents as a result of the night time economy, and noise during night time hours. However, Policy TC7 includes mitigation requirements for night time economy venues, including mitigating noise, reducing the negative health impact upon local residents.</p> <p>Policy TC5 (Food and drink) includes the development of cafes and restaurants. These areas are likely to provide places for socialisation and meeting places, also improving mental wellbeing.</p>

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	<p>All policies within Town Centres contribute to improving the diversity of the economy within Tower Hamlets, and encouraging economic growth through a range of sectors across the borough. Policy TC1 improves the vitality and resilience of the town centres within Tower Hamlets, through promoting different uses and frontages to ensure diverse uses and promote economic growth.</p> <p>Policy TC2 supports the retail function in specialist centres. This contributes to bringing visitors back to the high street and improving the economy of town centres. Encouraging retail also preserves their uses and improves the diversity of town centres.</p> <p>Policy TC7 also improves night time economy within town centres. As the borough has a number of town centres playing a significant role in the night time economy, improvements to the night time economy are likely to have significant positive effects on the borough's overall economy.</p> <p>Policy TC8 (Short-stay accommodation) promotes visitors to Tower Hamlets and is likely to improve the visitor economy.</p> <p>Policy TC4 (Markets) preserves the markets within Tower Hamlets, also preserving cultural diversity within the borough and promoting a diverse economy.</p>
IIA4: Employment & Skills	++	M	D	R	I	P	LT	<p>Additional town centre developments could contribute to the availability of additional employment opportunities within the borough.</p> <p>Policy TC1 directly provides opportunity for employment in retail and hospitality across Tower Hamlets. It also increases employment for night-time workers as a result of the night time economy. A large proportion of town centres in Tower Hamlets provide night time economy areas, improving employment opportunities. Policy TC7 also is likely to result in an increase in employment opportunities as part of the night time economy.</p>
IIA5: Housing	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA6: Crime & Safety	+/-	M	D	R	R	P	MT	<p>Policy TC1 promotes inclusive design, too ensure vulnerable users feel safe during the day and night. The policy also improves accessibility and wayfinding within town centres, improving safety and the feeling of safety.</p> <p>Policy TC7 requires night time economy developments to mitigate against any negative impacts, including noise, odours and anti-social behaviour. This is likely to minimise crime in these areas, particularly from anti social behaviour. New developments are also encouraged to improve the safety of these activities through the 'Ask for Angela' and National Pubwatch schemes. This is also likely to improve the feeling of safety.</p>

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Indirect positive impacts on crime and safety are also likely as a result of improving the active frontages within the borough, preventing vacant areas and reducing the likelihood of crime.
I/A7: Sustainable Transport	+	M	D	R	I	P	LT	<p>All policies outlining development within town centres are likely to indirectly encourage public transportation use as these areas are well connected to existing public transportation.</p> <p>Policy TC6 (Entertainment uses) promotes the development of entertainment uses out of the town centre where there is good public transport accessibility.</p> <p>Policy TC7 also outlines that any out of town centre night time economy developments should have good public transport accessibility (within 400m of a night bus or tube stop).</p> <p>Policy TC8 requires public transport linkages to short stay accommodation to encourage visitors to use public transport.</p>
I/A8: Accessibility	+	L	D	L	R	P	MT	Whilst the Town Centres policies do not include a specific policy addressing accessibility, policy TC5 requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users.
I/A9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A10: Landscape & Townscape	+	M	D	R	I	P	LT	<p>All policies place restrictions on developments out of town centres, which will help to preserve the existing townscapes and landscapes within the borough, provided design is sensitive to the existing townscape.</p> <p>Policy TC1 promotes active primary and secondary frontages. This contributes to improving the townscape value and public realm.</p> <p>Policy TC2 preserves town centre usage and is likely to attract visitors and increase footfall, as well as improving frontages and the public realm.</p> <p>Similarly, Policy TC5 prevents the over proliferation of hot food takeaways, also improving the diversity of the townscape.</p> <p>Policy TC9 preserves markets, ensuring a diversity within landscapes and improving the public realm.</p>
I/A11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain if the development of town centres, and associated spaces, will contribute to improvements to the setting of the local historic environment. There is potential that sensitively designed developments could improve the setting of heritage assets, equally they may also erode the historic character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.
I/A12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+	M	I	R	R	T	MT	Policy TC2 seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
IIA15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA16: GHG Emissions	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA17: Waste	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	<p>Policy TC2 outlines that where a vacant site is not utilised, the site is to be supported for other uses to make use of the space. This promotes the use of brownfield/ previously developed land within the borough.</p> <p>Similarly, Policy TC9 outlines that the development of new markets outside of town centres will be supported where they bring vacant sites back into use, further supporting the use of brownfield land/ previously developed land.</p>
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> Potential for positive cumulative effects on economy and employment through revitalising and boosting town centres and night time economy. Positive potential effects on landscape in conjunction with other policies through improvements to the public realm. There are also potential positive effects upon crime and safety as a result of improvements to town centre areas, in conjunction with other policies such as People, Places and Spaces. Positive cumulative effects are likely in combination with the Inclusive Economy and Good Growth policies. <p>Inter-plan:</p> <ul style="list-style-type: none"> There are potential positive cumulative effects on population and equalities with London Plan 2021 policies (SD4, SD6, SD7, SD8), driving improvements to social infrastructure, including employment opportunities and improved education, meeting community needs. Town centre policies in combination with London Plan 2021 policies (E9, E10) have the potential for positive cumulative effects on the economy, creating a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services. Improvements to the night time economy are likely to have significant positive effects on the borough's overall economy in combination with London Plan 2021 policies (HC5, HC6). Sustainable transport measures are likely to be specific to each development, but there may be cumulative benefits if implemented across plans (as set out in London Plan policies) (SD4, SD6). The preservation of the historic environment is encouraged by London Plan 2021 policies (HC5) whereby the temporary use of vacant buildings (including heritage assets) for creative workspace and activities is encouraged, resulting in positive cumulative effects. This policy supports the restoration of listed buildings; retaining their character for community uses. 							

Policy Grouping	Town Centres							
Policy Codes	TC1, TC2, TC3, TC4, TC5, TC6, TC7, TC8							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> • Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). • Developments should seek to improve the public realm, including improving wayfinding and providing permeability through town centres to provide access to those with disabilities, or pushchairs. • The TfL Healthy Street Principles should be applied and the Healthy Streets Tool should be utilised where appropriate as set out in Policy MC2 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> • Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres and is necessary to meet the immediate convenience needs of local people and/or support the function of designated employment locations. • This policy requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users. • The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis. • Operation of the evening economy should be considered in tandem with safety measures to protect groups who could be more likely to be a victim of hate crimes. This includes women, LGBTIQ+ people, and people of different ethnicities. Night time venues can do this through the use of the 'Ask for Angela' and National 'Pubwatch' schemes, for just one example. This is also likely to improve the feeling of safety. • Ensure accessibility standards are adhered to in short-stay accommodation. <p>HIA</p> <ul style="list-style-type: none"> • The policies outlined within the Town Centres theme are likely to have mixed impacts upon the selected health determinants. These impacts are likely to be predominantly positive, with positive effects expected for young people including care leavers, older people, new and expectant mothers, women and girls, people with disabilities, low-income and unemployed groups and socially isolated groups. • Policies support social cohesion across the borough, with existing routes being prioritised and new venues being developed to encourage opportunities for social interaction between community members. • Services are also being made more widely available to those workers in the night-time economy who cannot access them during normal business hours through the requirements for late-opening and 24-hour services. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> • Crime rates are significantly high within the borough, particularly with regards to violent crime and antisocial behaviour. • There are opportunities to improve neighbourhoods and reduce the prevalence of antisocial behaviours. • There are opportunities to increase the safety of active transport modes such as cycling and walking. • Vulnerable road users such as cyclists and pedestrians are more likely to be casualties. • Maintaining the vitality and attractiveness of town centres and high streets will be an ongoing challenge as shopping patterns and service delivery models change, especially with the growth of online shopping. 							
Recommendations	<ul style="list-style-type: none"> • More emphasis should be placed on ensuring that night time uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as citizen type patrols, CCTV and lighting. 							

2.7 Community Infrastructure

The assessment of the Community Infrastructure Policies are presented in **Table 2-7** below.

Table 2-7 – Community Infrastructure Policies Assessment

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	I	P	LT	<p>All policies within Community Infrastructure contributes to providing community facilities for current and future populations.</p> <p>Policy CI1 (supporting community infrastructure) protects, maintains and enhances existing community facilities and increases the capacity of existing community facilities where other development will increase demand. This improves the provision for the local community and considers both the current and future community needs as well as delivering social value to the community through a range of services and opening hours.</p> <p>Policy CI3 (new and enhanced community facilities) also outlines the development of new community facilities, that will fit local needs and serve the changing needs of the local community.</p>
IIA2: Human Health	++	M	D/I	R	R/I	P	MT/ LT	<p>There are both direct and indirect positive effects on human health as a result of Community Infrastructure policies, through improving physical health and mental wellbeing.</p> <p>Policy CI1 outlines improvements to community facilities, including healthcare and sports and leisure facilities. This improves physical health through encouraging physical activity, as well as improving mental wellbeing through improving spaces for socialisation and encouraging activity.</p> <p>Policy CI3 will help to improve physical health through providing new community facilities and leisure facilities. This also improves mental wellbeing through new social facilities. Additionally, new early education and care facilities will also be located in areas of acceptable air quality, indirectly improving health. This is particularly of note as young people and older people are most at risk of respiratory illnesses such as asthma as a result of poor air quality.</p>

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA3: Economy & Town Centres	++	M	D	R	I	P	LT	<p>Policy CI1 states that new community facilities will be directed towards centres. This promotes the diversity of town centre services and improves visitor numbers to centres, including social facilities like libraries, cultural facilities. This also includes facilities such as public houses, boosting the economy of town centres.</p> <p>Policy CI3 also focuses the development of new and enhanced community facilities in town centres, further boosting and diversifying the economy in Tower Hamlets centres.</p> <p>Policy CI4 (public houses) preserves public houses. This boosts the local economy and provides a diverse range of uses within town centres. Preserving public houses also improves the nighttime economy within Tower Hamlets.</p> <p>Policy CI5 (arts and culture facilities) also outlines that new arts and cultural facilities will be focussed in town centre locations, providing diversity to town centre economies and boosting the nighttime economy.</p>
IIA4: Employment & Skills	++	M	D	R	I	P	LT	<p>The policies within Community Infrastructure contribute to improving education amongst the population of Tower Hamlets.</p> <p>Policy CI1 includes preservation of the existing provision of education facilities, and the development of new facilities in line with community needs. The policy also outlines improving the accessibility of education facilities. This is likely to result in increased educational levels across the borough.</p> <p>Policy CI3 also includes the provision for new early education facilities where required, providing early years educational spaces for young children. Additional adult and higher education facilities are also proposed, improving educational levels across both children and adults within the borough.</p>
IIA5: Housing	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA6: Crime & Safety	+	L	D	R	I	P	LT	<p>Policy CI3 aims to ensure that new community facilities are designed to facilitate and encourage wider community use and do not look and feel exclusive to the occupants of the development. It aims to ensure safety by giving consideration of the use of street facing active frontages and presenting openness to the wider community whilst enhancing a feeling of safety on the streetscape through passive surveillance.</p>
IIA7: Sustainable Transport	+	M	D	R	I	P	LT	<p>All policies aim to improve accessibility to community facilities, which will allow residents to live their lives more locally. This in turn will reduce the reliance upon motorised vehicles and support a modal shift.</p> <p>Policy CI3 aims to ensure that new facilities will be directed towards locations which are accessible to their catchment areas through strong public transport links and by prioritising active travel. This will help to reduce the demand for use of private vehicles and help to support a modal shift.</p>

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	++	M	D	R	R	P	LT	<p>Policy CI2 includes the development of accessible, inclusive new facilities. This includes allowing public access. This is likely to improve access to facilities to all groups of the public, including disabled and low income users.</p> <p>Policy CI3 states that new facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility.</p>
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for community infrastructure developments to result in the loss of biodiversity and natural capital. As the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain if the development of community infrastructure, will contribute to improvements to the setting of the local townscape and landscape character. There is potential that sensitively designed developments could improve townscape, equally they could erode the townscape and landscape character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>It is currently uncertain if the development of community infrastructure, will contribute to improvements to the setting of the local historic environment. There is potential that sensitively designed developments could improve the setting of heritage assets, equally they could erode the historic character. However, this is likely to be determined by individual developments that may arise as a result of the local plan.</p> <p>Policy CI4 (public houses) promotes the preservation of the character of public houses, where development is permitted. Preserving the nature of these assets also has the potential to preserve designated and undesignated heritage assets. However, this is to be determined by individual developments that may arise.</p>
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+	M	I	R	R	T	MT	Policy CI3 seeks to ensure that development proposals for new community facilities take into account air quality levels as part of the relevant guidance from the Department for Education and Sport England. Additionally, the location of early education and care facilities must meet the needs of young children and promote their development, involving their locating away from areas of poor air quality.
IIA15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of embodied carbon. As the number of developments and the detailed design is not currently available, uncertain effects have been identified.

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. As the location of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
IIA18: Efficient use of Land	+	L	I	L	R	P/T	MT/LT	Policy CI3 permits the utilisation of vacant land sites for community uses, which promotes the use of existing sites within the borough.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are potential positive cumulative effects on the economy as a result of developments within town centres, diversifying the economy. There are also positive cumulative effects upon health (both physical and mental wellbeing) through the increased provision of community spaces, in conjunction with improved physical activity and places for mental wellbeing. The development of additional community facilities, fitting future community needs, also has positive cumulative effects in conjunction with People Places and Spaces and Homes for the Community policies. There is potential for negative cumulative and synergistic effects on biodiversity, landscape and townscape, historic environment, air quality, GHGs, flooding and efficient use land if multiple developments were to come forward. These may conflict with policies PS6, PS7, PS8, BO1, BO2, CG1 and CG9. There is potential for negative cumulative effects upon water quality, air quality and GHG emissions due to increased works and potential land take within the borough, however this is dependent on individual development sites that may come forward. Multiple developments are also likely to be resource intensive and significantly increase levels of embodied carbon as well as emissions associated with construction. <p>Inter-plan:</p> <ul style="list-style-type: none"> There are potential positive cumulative effects resulting from the provision of social infrastructure including new community facilities and services if implemented across plans (as set out in London Plan policies) (S1, S2, S3, S4, S5). There are potential for minor negative cumulative effects of high concentrations of licensed premises on crime and safety, anti-social behaviour, noise pollution, health and wellbeing and other issues for residents and nearby uses in combination with London Plan 2021 policies (HC5, HC6). However, Design Out Crime initiatives working across both policies will result in positive cumulative effects for borough residents. The Agent of Change principle is also a key consideration in both the London Plan and the NLP. Sustainable transport measures are likely to be specific to each development, but there may be cumulative benefits if implemented across plans. London Plan policies (HC6) promote boroughs to ensure night-time economy venues are well-served with safe and convenient night-time transport, in line with 24-hour goals. This could have associated benefits for businesses: expanding into night-time economic opportunities. The preservation of the historic environment is encouraged by London Plan 2021 policies (HC5) whereby the temporary use of vacant buildings (including heritage assets) for creative workspace and activities is encouraged, resulting in positive cumulative effects. This policy supports the restoration of listed buildings; retaining their character for community uses. There is potential for positive cumulative effects upon efficient use of land in combination with London Plan 2021 policies (SI7), with developments encouraged to make effective use of the site to maximise the opportunities for multi-purpose and shared use facilities. 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible. Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). Application of Policy BO1 will likely help to reduce effects on biodiversity and open spaces. 							

Policy Grouping	Community Infrastructure							
Policy Codes	CI1, CI2, CI3, CI4, CI5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply and future planned supply is sufficient in supporting the new community. 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities. New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility. <p>HIA</p> <ul style="list-style-type: none"> These policies will have predominantly positive effects upon the community of LBTH. These policies are anticipated to benefit children and young people, older people, people with disabilities, people with long term health conditions, and socially excluded groups. The improvement of social infrastructure such as parks and sports centres will also increase social cohesion and safety within the borough. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> There will be a need for adequate support and greater access to services and facilities for the young population, families with young children, and single parent families on one income. There are opportunities to improve access to facilities and services, as well as housing, for young adults and people with disabilities. The population of Tower Hamlets is expected to increase both in number and diversity and decrease in age profile. LBTH reducing age profile will present a greater need for access to leisure facilities and outdoor space, as well as a greater pressure on healthcare and support to tackle loneliness There is a need to provide more greenspaces and high-quality public realm which can provide social spaces 							
Recommendations	<ul style="list-style-type: none"> Within Policy CI2, the explanation of Part 2 could benefit from including further explanation as to how inclusive design can improve access to disabled users and those with mobility issues. Policy CI2, Part 2 could also benefit from including the promotion of schemes to provide access to low-income groups. 							

2.8 Biodiversity and Open Space

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-8** below.

Table 2-8 – Biodiversity and Open Space Policies Assessment

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	R	P	LT	<p>Policy BO1 (green and blue infrastructure) outlines improvements to the quality of open spaces within the borough, with areas of deficiency to open space being prioritised, therefore improving community facilities. The policy also includes the promotion of using water spaces for cultural and recreational use, providing spaces for the community.</p> <p>Policy BO2 (open spaces and the Green Grid network) provides community facilities within developments to open space, including playgrounds and outdoor gyms. These spaces will be accessible and will ensure high quality inclusive design.</p> <p>Policy BO3 (water spaces) also contributes to improving the local amenity space of riverbanks and dock edges, providing increases in publicly available spaces.</p> <p>Policy BO6 (play and recreation spaces) provides opportunities for sports, recreation and play areas that meet the needs of the population, including providing spaces for children and young people, disabled users, adults and carers. The policy also includes improving provision of play space in areas which have high deficiency to play space, ensuring improved access for all groups.</p> <p>Policy BO7 (food growing) provides spaces for community gardens, and includes the development of community facilities in major housing developments. This provides community spaces for food growing as well as social interaction.</p>
IIA2: Human Health	++	M	D	R	R	P	MT/LT	<p>Policy BO1 maintains and enhances green infrastructure and accessible open spaces. This contributes to improving both mental wellbeing and physical health through providing spaces for social interaction and physical activity. Additionally, this promotes recreation and leisure on blue spaces, improving health.</p> <p>Policy BO2 provides opportunities for physical activity and improvements in wellbeing through providing opportunities for outdoor sport, fitness and recreation. Point 2 (i) also includes the integration of food growing opportunities where feasible. This provides opportunities for healthy foods and promotes healthy lifestyles.</p> <p>Policy BO6 is likely to result in increased physical activity amongst children and young people, and adults, through improving the provision of sports and recreation facilities. This also includes designing spaces to reduce the harm caused by poor air quality. This is likely to reduce the exacerbation of respiratory illnesses amongst children.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								Policy BO7 also improves physical and mental health through the increase in the provision of food growing spaces, and preservation of allotments and community gardens. These provide spaces for social interaction, as well as opportunities for healthy food.
IIA3: Economy & Town Centres	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA4: Employment & Skills	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA5: Housing	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA6: Crime & Safety	+	L	D	L	I	P	LT	<p>Policy BO1 includes the requirement for new green spaces designed to be safe to users. However, it is uncertain what measures will be included to improve safety within open spaces as this is likely to be determined by scheme design.</p> <p>Policy BO3 (specifically point 2 f) improves the safety of the borough's water spaces, including the provision of lifesaving equipment, improved lighting and wayfinding, and managing competing spaces between users. This is likely to improve user safety, and reduce the number of incidents along the borough's water environments.</p> <p>Policy BO6 includes safe design to ensure the safety of users, including children.</p>
IIA7: Sustainable Transport	+	L	D	R	I	P	LT	<p>PO2 outlines developments to the green grid, this contributes to improving the appeal of walking networks, and encouraging active travel.</p> <p>PO3 point 3 also includes the requirement for developments to integrate with the waterside environment, including walkways, cycle paths and towpaths. The integration of these areas is likely to result in improved connectivity of the active travel network, encouraging active travel and promoting sustainable transport modes.</p>
IIA8: Accessibility	+	M	D	R	I	P	LT	<p>Policy BO1 maintains and enhances 'accessible open spaces' throughout the borough, including at Lea River Park as well as improving way-finding to water spaces. This provides spaces for the general public, including all social groups.</p> <p>Policy BO2 also contributes to the delivery of new or enhanced publicly available open space. These spaces are to be designed to be enjoyed by people of all ages and physical abilities.</p> <p>PO6 includes designing spaces for all abilities and ages, addressing barriers to play through inclusion and equality. However, the specific measures proposed will be determined by individual scheme design.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	++	H	D	R	R	T	LT	<p>All policies within Biodiversity and Open space contribute to improving biodiversity and natural capital across the borough, including improving and enhancing blue and green spaces, green infrastructure, and contributing towards biodiversity net gain (BNG).</p> <p>Policy BO1 requires developments to improve green infrastructure and open space in line with local biodiversity action plans, and improves the green grid network, providing ecological corridors. The policy also enhances blue spaces and improves the ecological and biodiversity values of the borough's water spaces, including rehabilitating and rewilding. Additionally, it outlines requirements for all development proposals to achieve minimum urban greening factor and BNG targets.</p> <p>Policy BO2 enhances biodiversity through improvements to open spaces and the green grid network, this also includes preserving the ecological value of open spaces.</p> <p>Policy BO3 requires developments to enhance the biodiversity of the water space within the borough, as well as rewilding and re-naturalisation, further resulting in improvements to local biodiversity and ecology in the water areas of Tower Hamlets.</p> <p>Policy BO4 protects and retains existing habitats and biodiversity. It also outlines the replacement where preservation is not possible. Additionally, the policy requires developments to deliver a BNG of 30%. There is also a requirement for development proposals to preserve designated European sites, and undertake a Habitat Regulations Assessment where adverse effects are likely. The policy as a whole therefore directly results in preservation and enhancement of biodiversity and natural capital within the borough. Additionally, it contributes to eradicating invasive species where possible.</p> <p>Policy BO5 contributes to developing areas for habitats and biodiversity within the borough, including increasing the provision of trees. Trees provide habitats for a range of species, and increase canopy connectivity, reducing habitat segregation.</p>
IIA10: Landscape & Townscape	++	M	D	R	I	P	LT	<p>Policy BO1 maintains the character of MOL, contributing to preservation of the landscape character. Additionally, preserving green and blue spaces enhances the landscape of Tower Hamlets, proving a range of high quality open spaces. Improving the water environment (point 3) is also likely to improve the appearance of these landscapes, further contributing to positive landscape character.</p> <p>Policy BO2 also provides new or enhanced open space, that is of high quality design and complements local character. These developments are likely to improve the public realm through improvements to open spaces and landscaping.</p> <p>Policy BO3 also contributes to conserving and improving the landscape of Tower Hamlets through enhancements to the setting of water spaces, as well as improving the river banks.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A11: Historic Environment	+	L	D	L	R	P	MT	<p>Policy BO2 requires developments to not have adverse impacts on the heritage value of the borough's open spaces. This policy is also likely to preserve the setting of the borough's open spaces and local heritage assets in these areas.</p> <p>Policy BO3 also contributes to the preservation of the heritage value of water spaces, preserving the historic environment of Tower Hamlets.</p>
I/A12: Flooding	++	L	I	L	I	P	MT/LT	<p>Policy BO2 (specifically 2e) includes the incorporation of soft landscaping and sustainable urban drainage systems (SuDS). This contributes to improving flood resilience within new open space.</p> <p>Policy BO3 has considered flood risk within developments, requiring developments to provide suitable setbacks from water space edges. This contributes to mitigating flood risk and prevents the severance of walkways, cycle paths and canal towpaths during flood events.</p>
I/A13: Water Quality	++	M	D	R	R	P	LT	<p>Policy BO1 seeks to protect the integrity, improve the ecological and biodiversity, and water quality of water spaces within Tower Hamlets. This results in direct positive effects upon water quality.</p> <p>Policy BO3 protects the water environment and ensures that development must not adversely effect the water quality within the borough. Additionally, enhancing the quality of the water space through ecological, biodiversity and aesthetic methods is likely to result in improvements to water quality.</p>
I/A14: Air Quality	+	M	I	R	R	T	MT	<p>Policy BO4 states that development proposals must enhance biodiversity and contribute to nature recovery within the borough. Urban greening and the provision of living building elements is considered especially beneficial in areas of sub-standard air quality throughout the borough.</p>
I/A15: Climate Change & Resilience	++	M	I	R	R	T	LT	<p>Policy BO5 provides opportunities for climate resilience, from measures such as green roofs and walls, SuDS, and trees. These measures can increase drainage and reduce surface runoff, as well as providing shade reducing the risk of overheating.</p>
I/A16: GHG Emissions	+	M	I	R	R	T	LT	<p>Policies BO1, BO4 and BO5 all aim to protect and enhance biodiversity and blue green infrastructure within the borough. The application of green infrastructure presents an opportunity to reduce GHG emissions using a multi-faceted ecosystems-based approach</p>
I/A17: Waste	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A18: Efficient use of Land	+/-	M	D	R	R/I	P/T	MT/LT	<p>Policy BO1 restricts 'inappropriate' development proposals on MOL. This preserves MOL and encourages efficient use of existing brownfield land in the borough. However, Policy BO2 does support development on MOL in specific circumstances. This has the potential to result in the loss of MOL, depending on the nature of schemes that come forward.</p> <p>Policy BO7 provides opportunities for the use of vacant sites as new allotments for food growing spaces. This contributes to making efficient use of land through the utilisation of existing vacant sites.</p>

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>Intra-project: There are potential positive cumulative effects anticipated for population and equalities, health and wellbeing, biodiversity, landscape, water quality, and efficient use of land as a result of the proposed policies. There is likely to be an increase in biodiversity across the borough, and improved community open spaces, as well as improvements to physical and mental health.</p> <p>Inter-project:</p> <ul style="list-style-type: none"> Positive cumulative effects on Population and Equalities are identified as a result of NLP policies (BO7) and London Plan policies (G8). These policies provide provision for community gardens and food production, improving social integration and community cohesion. This may also lead to positive cumulative effects on Human Health, promoting more active lifestyles and better diets. Urban greening is encouraged by London Plan policies (G5) and complements NLP policies (BO1) that require all development proposals to achieve minimum urban greening factor (UGF) resulting in an increase in green cover throughout the borough. NLP policies (BO1, BO4) require developments to provide a minimum 2.5 biodiversity unit (BU) per hectare increase or deliver biodiversity net gain (BNG) of 30%, exceeding minimum BNG requirements of 10% and managing impacts on biodiversity as outlined in London Plan policies (G6) generating positive cumulative effects. Positive cumulative effects are anticipated through the London Plan policies (G3) and NLP Biodiversity and Open Space policies (BO1), protecting Metropolitan Open Land (MOL) from inappropriate development. The London Plan also supports the extension of MOL where appropriate. NLP policies (BO2) also work harmoniously with London Plan policies (G4) to create areas of publicly accessible open space that complements local character. These developments are likely to improve the public realm. Enhancements to Water Quality are encouraged through NLP policies (BO3) and London Plan policies (SI17), with positive cumulative effects identified. London Plan policies require developments that facilitate river restoration to be supported, concurrently providing habitats and protecting biodiversity. 							
Mitigation and Enhancement Measures	No mitigation measures have been outlined for these policies. Mitigations are likely to be based on site specific information once development sites have come forward.							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> New parks and open spaces should be accessible to all members of the public. Design should consider safety by including appropriate lighting, accessible pathways and access and egress points. Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility. Accessible surfacing should be considered for mobility aid users and people with mobility restrictions. Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces. Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities. Accessible surfacing should be considered for mobility aid users and people with mobility restrictions. Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health. <p>HIA</p> <ul style="list-style-type: none"> These policies are anticipated to impacts on most health determinants, including positive effects for children and young people, older people, people with disabilities and mobility impairments, and socially isolated groups including new and expectant mothers. Improved access to these spaces under this theme will enhance the benefit experienced through socialisation and physical activity opportunities. Opportunities for education arise from the inclusion of the food growing policy, with young children particularly benefitting from this. 							

Policy Grouping	Biodiversity and Open Space							
Policy Codes	BO1, BO2, BO3, BO4, BO5, BO6, BO7							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> • There is a need to manage heat risk in new developments as well as increases the amount of green space and vegetation. • Light, air, and noise pollution from increasing urban development in the borough may put strains on nearby protected areas • New legislation regarding biodiversity net gain will require developments to implement demonstratable increases in biodiversity. • The inclusion of BGI can help with mitigating embodied carbon, improve air quality, reduce the Urban Heat Island effects and help to make developments more climate resilient, especially when it comes to flood mitigation. • Future growth could risk compromising landscape and townscape character and features. • The physical and chemical quality of water resources is an important aspect of the natural environment and can be adversely affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat. 							
Recommendations	<ul style="list-style-type: none"> • Policy BO1 (b) could be changed to "maintain and enhance" the open character of Metropolitan Open Land (MOL) • Policy BO1 (d) (ii) could be amended to include safety measures, such as lighting and clear lines of sight. • Policy BO6 (2) (b) could include ways to tackle barriers to inclusion and equality. • Policy BO4 should make reference to the requirements of BNG under the Environment Act 2021 and Defra's Biodiversity Metric. Part 2 of the policy is quite complicated and some of the text could be moved to the supporting text. 							

2.9 Movement and Connectivity

The assessment of the Biodiversity and Open Space Policies are presented in **Table 2-9** below.

Table 2-9 – Movement and Connectivity Policies Assessment

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D/I	R	R	P	LT	Developing active and sustainable travel networks, as outlined within Policies MC1 (sustainable travel) and MC2 (active travel and healthy streets) contribute to providing services to fit the needs of the current and future population of Tower Hamlets. Additionally, both MC1 and MC2 provide improved accessibility to all social groups, including disabled, elderly, women and girls and other marginalised groups.
IIA2: Human Health	++	M	D	R	I	P	LT	<p>Policy MC1 encourages active travel. This directly results in improvements to human health through improved physical activity rates. Additionally, the policy outlines that active travel developments should utilise the Healthy Streets approach, improving health and wellbeing through the design of developments.</p> <p>Policy MC2 (active travel and healthy streets) also contributes to improving the quality and connectivity of the active travel network. This is likely to improve physical health, as well as implementing the Healthy Streets approach. Additionally, encouraging a modal shift away from private vehicles, as is promoted by all policies within Movement and Connectivity, improves air quality. Air quality improvements also contribute to improving physical health, particularly amongst children and young people, the elderly, and those with respiratory illnesses.</p> <p>Policy MC3 also improves health through the promotion of active travel, improving physical activity. The policy also ensures a reduction in environmental impacts such as improving air quality, improving health and reducing exacerbation of health conditions as a result of poor air quality.</p>
IIA3: Economy & Town Centres	+	M	I	L	I	P	LT	<p>Policy MC1 aims to prioritise the needs of all pedestrians and cyclists, enabling people to choose active travel modes as the primary mode of travel for short trips within the borough, in line with 15-minute city principles. Whilst Policy MC2 states that development proposals must be designed to maximise the contribution of the public realm to encourage and enable active travel modes. It also encourages the use of the Healthy Streets principles to ensure that the development is inclusive and accessible to all groups.</p> <p>Improvements to the public realm and ensuring greater accessibility to all groups, will help to encourage more walking and cycling and increase footfall and potential improve the vitality within the town and district centres.</p>
IIA4: Employment & Skills	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA5: Housing	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA6: Crime & Safety	++	M	D	R	I	P	LT	Policy MC2 outlines the requirements for new developments to provide 2m wide footways and segregated routes for pedestrians and cyclists where possible. This is likely to result in improvements to user safety due to enabling safe overtaking and reducing user conflicts. Point 3 (e) also includes considering the design and safety of women, girls and gender diverse people. This is likely to improve feelings of safety amongst the

Policy Grouping		Movement and Connectivity						
Policy Codes		MC1, MC2, MC3, MC4, MC5						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>population. There are also measures to ensure good sight lines and surveillance, further reducing the likelihood of crime.</p> <p>Policy MC4 (parking and permit-free) outlines requirements for secure cycle parking. This is likely to reduce bicycle theft in the borough.</p>
IIA7: Sustainable Transport	?	M	D	R	I	P	LT	<p>Policy MC1 promotes the development of the sustainable travel network, including active travel. This encourages a modal shift away from private transport and towards sustainable transport modes.</p> <p>Additionally, Policy MC2 (active travel and healthy streets) promotes the expansion of walking and cycle network, improving active travel and further encouraging the modal shift from private vehicles.</p> <p>Policy MC4 outlines plans for parking management throughout the borough in order to address issues of congestion as well as respond to the needs of the community. A car free approach will be considered in areas of Tower Hamlets where the PTAL is high (4 or above). However, in those areas where PTAL scores are low, parking will be delivered in line with the London Plan maximum parking targets. This could result in an increased reliance upon private vehicles in those areas in the north and south of the borough, where scores range between 1-3. This will work against the achievement of this IIA objective.</p>
IIA8: Accessibility	++	M	D	R	I	P	LT	<p>Policy MC1 contributes to improving public transport, including enabling walking, wheeling and cycling. This is likely to improve access to all users, including those with mobility issues. Improving public and active transport also allows those on low incomes to access areas of the borough. The policy aims to reduce severance and increase permeability across the borough.</p> <p>Policy MC2 outlines the requirement for new active travel routes will be required to have footways 2m wide or using the Transport for London Pedestrian comfort level tool, whichever is greater. This is likely to improve access to disabled users and users with pushchairs, improving accessibility. Point 3 (e) also includes inclusive design for elderly, disabled and all genders. This also improves connectivity throughout the borough through the development of cycle lanes, including for adapted bicycles, contributing to improved accessibility for all groups.</p> <p>Policy MC4 aims to meet the needs of those community members who rely on private vehicle usage in areas of poor public transport accessibility are also accounted for through the provision of maximum parking in these areas.</p>
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in the loss of biodiversity and natural capital. It is anticipated that as the majority of the proposals will be delivered within the existing highway boundary, that loss will be small scale. However, delivery of public realm improvements (as per Policy MC2) may include additional planting and green infrastructure which could provide small scale habitats. As the overall design of proposals is not yet known uncertain effects have been identified.</p>

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A10: Landscape & Townscape	+/-	M	D	R	I	P	LT	<p>All policies support a modal shift and reduction of vehicles on the borough's roads. A reduction in vehicles is likely to result in a reduction of vehicular disturbance, such as noise and air pollution, and subsequently improve the landscape and townscape through reduced numbers of vehicles on roads.</p> <p>Policy MC2 includes development engagement with the Healthy Streets Approach. Utilising this approach, in addition to improving active travel networks is likely to result in positive effects on the local landscape, including improving the public realm, particularly through positive design and the requirements of healthy streets such as 'everyone feels welcome' and 'things to see and do'.</p> <p>Policy MC4 includes the development of electric charging on streets. The integration of electric charging on streets is likely to result in positive effects on the landscape through positive design.</p> <p>There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in negative effects on the landscape and townscape setting. It is however anticipated that that as the majority of the proposals will be delivered within the existing highway boundary.</p>
I/A11: Historic Environment	+/-	M	D	R	I	P	LT	<p>All policies support a modal shift and reduction of vehicles on the borough's roads. A reduction in vehicles is likely to result in reductions in pollution and disturbance, reducing the degradation of heritage assets and improving their overall setting.</p> <p>Policy MC2 includes the application of a Healthy Streets Approach, which is likely to result in positive effects on the public realm. This may help to improve the setting of heritage assets, however, public realm improvements will need to be sensitive to the historic environment.</p> <p>There is potential for those proposals set out within Policy MC1 as well as any additional proposals that may come forward as part of this policy and other 'Movement and Connectivity' policies to result in negative effects on the historic environment setting. It is however anticipated that that as the majority of the proposals will be delivered within the existing highway boundary.</p>
I/A12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	Policy MC5 (sustainable delivery, servicing, and construction) has resulted in uncertain effects on water quality as a result of water freight. Increasing freight on water has the potential to reduce water quality. However, this is likely to be determined by the quantity of freight activity and the nature of freight being transported.
I/A14: Air Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	All policies encouraging active travel and contribute to a modal shift away from private car use and reduction in emissions are likely to contribute to improving air quality across the borough. Additionally, restricting car parking and encouraging car free developments as a starting point for all development proposals, will help to reduce reliance upon motorised vehicles. However, in those areas where PTAL scores are low, parking will be delivered in line with the London Plan maximum parking targets. This could result in an increased reliance upon private vehicles in those areas, and have subsequent effects on air quality.

Policy Grouping		Movement and Connectivity						
Policy Codes		MC1, MC2, MC3, MC4, MC5						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>There is also potential for the construction of new and upgraded active travel routes to result in increased to temporarily reduce air quality (from dust and plant emissions) during construction.</p> <p>Policy MC3 (impacts on the transport network) also acknowledges the improvements to air quality through new developments. Additionally, utilising the Healthy Streets Approach considers improving air quality through 'clean air', further contributing to indirect improvements on air quality.</p>
I/A15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A16: GHG Emissions	+/-	M	D	R	R	P	MT	<p>All policies within Movement and Connectivity contribute to encouraging modal shift away from private car use, therefore reducing GHG emissions from vehicles. However, there is potential for the construction of new and upgraded active travel routes to result in increased GHG emissions during construction and they are likely to have high levels of embodied carbon.</p> <p>Policy MC4 includes the provision of electric vehicle charging in new developments. This encourages sustainable vehicles and is likely to reduce GHGs from private vehicles.</p> <p>Policy MC5 also contributes to reducing GHGs. However, the development of new freight areas has the potential to increase emissions. Additionally, despite the policy stating that zero and low emissions freight vehicles should be used where possible, there is potential for the use of traditional freight vehicles and increases in freight activity within Tower Hamlets. This has potential to result in increased GHG emissions depending on the nature of freight vehicles used and increases in activity.</p>
I/A17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Some proposals which may come forward as a result of these policies may be resource intensive and could generate a significant amount of construction waste. If a preference for road network reallocation is sought there is potential for positive effects. As the location and design of some proposals that may come forward as a result of these policies are not yet known, uncertain effects have been identified.
I/A18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The location of some proposals that may come forward as a result of these policies is not yet known. Whilst it is likely that the majority may result in the reallocation of the existing highway network, there could be potential for some land take. If a preference for road network reallocation is sought there is potential for positive effects.
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There are potential positive cumulative effects on sustainable transport and accessibility across the borough, as well as air quality improvements. This is likely to result in a modal shift away from private transport and towards public transport and active travel. There are also potential positive effects on health through increased activity rates amongst residents. There is a potential for a cumulative increase in car usage if parking provision is maximised. Making use of private vehicles more convenient could have adverse effects on air quality and GHGs in these locations. This works against Policy MC4. 							

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>Inter-plan:</p> <ul style="list-style-type: none"> There are likely to be positive cumulative effects on both Population and Equalities and Human Health with NLP policies (MC1, MC2) working in combination with London Plan policies (GG3, T2). Policies improve accessibility to cycling to all social groups, with development proposals encouraged to demonstrate how cycle parking areas will provide facilities for disabled cyclists. The Healthy Streets Approach prioritises health in all planning decisions at t The inclusion of the 'last-mile' principle aligns with polices stated in the London Plan. This is likely to generate positive cumulative effects as the beneficial environmental effects of this process will be more widespread. NLP policies (MC4) require the consideration of potential for residential car parking in areas with low PTALs (1-3) in accordance with the maximum parking standards set out within London Plan policies (T6). These policies will provide cumulative improvements to the provision of residential parking in less accessible areas, reducing barriers of isolation. Conversely, this is likely to result in cumulative negative effects on air quality, human health and GHGs. This also contradicts the borough's Transport Strategy, where Outcome 2 aims to reduce demand for on street car parking and the amount of car trips in the borough NLP policy MC1's intention to improve accessibility of water transport is also concordant with themes of water transport in the London Plan, although no detail is given as to how improved accessibility will be achieved in relation to this mode. As such, no cumulative effects are anticipated to occur. 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Where possible, the reallocation of the existing road network should be preferred for the development of new schemes, to avoid loss of greenspaces and habitats and support the efficient use of land. Mitigation for IIA17 is likely to be offered by proposed Policy RW1 which aims to reduce the amount of waste and ensures that resources will be reused and recycled minimising waste wherever possible. Sensitive design should be considered for any new developments within town centres to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles. Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles. It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users. It is recommended that the Purple Badge Scheme is maintained to ensure there will be no negative impacts on protected groups, such as disabled people. Management should protect priority bays to maintain accessibility for protected groups. <p>HIA</p> <ul style="list-style-type: none"> These policies are anticipated to impacts on most health determinants, including positive effects for low-income groups and socially isolated groups including new and expectant mothers in particular. The theme is particularly supportive of improvements to settings for social cohesion throughout the borough. While climate change resilience is not directly built into the policies proposed under this theme, the reduced reliance on private vehicles brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> There is a need to improve sustainable transport modes (public and active) in line with LBTH's commitment to reach net-zero GHG emissions by 2045. Electric vehicle (EV) charging infrastructure will need to improve to support the growing demand of residents switching from petrol and diesel to hybrid and EVs. Transport issues affect different groups to varying extents, and there is potential that the barriers to accessing and using transport can be exacerbated by age, ethnicity and gender. 							

Policy Grouping	Movement and Connectivity							
Policy Codes	MC1, MC2, MC3, MC4, MC5							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> The number of vehicles on the roads is likely to increase as the population rises, putting air quality at further risk of degradation. Air pollution disproportionately affects the vulnerable in society, with the potential to exacerbate health inequalities further as the population increases. Air quality issues across LBTH can be addressed via a modal shift towards less polluting methods of transport (low carbon transport initiatives) and inclusive of active transport (e.g., cycling, walking etc.) thereby leading to a higher standard of air quality. 							
Recommendations	<ul style="list-style-type: none"> Policy MC2 could benefit from including mention of how sustainable transport can improve access to those on low-incomes. Policy MC5 could be made more stringent by replacing 'should' with 'will'. 							

2.10 Reuse, Recycling and Waste

The assessment of the Reuse, Recycling and Waste Policies are presented in **Table 2-10** below.

Table 2-10 – Reuse, Recycling and Waste Policies Assessment

Policy Grouping	Reuse, Recycling and Waste							
Policy Codes	RW1, RW2, RW3							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A2: Human Health	+	N/A	N/A	N/A	N/A	N/A	N/A	Policy RW2 (new and enhanced waste facilities) states that waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power. This may help increase the quality of new and existing housing stock and provide a more cost-effective heating solutions. Cost savings may help to reduce health inequalities and reduce the pressure of the rising cost of living.
I/A3: Economy & Town Centres	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A4: Employment & Skills	+	L	I	L	I	P	LT	The increase in waste facilities may result in employment opportunities for residents within the borough.
I/A5: Housing	+	L	I	L	I	P	LT	Policy RW2 (new and enhanced waste facilities) states that waste management facilities should incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power. Whilst this policy does not support the development of new housing, it may help increase the quality of new and existing housing stock and provide a more cost-effective heating solutions.
I/A6: Crime & Safety	+	L	D	L	R	P	LT	Policy RW2 requires new waste facilities to provide on-site measures to ensure safety and security. This is likely to result in a reduction in accidents, and improvement of safety on waste sites.
I/A7: Sustainable Transport	+	L	D	R	R	P	MT	Policy RW2 requires new waste developments, or the development of existing waste sites, to prioritise rail and water transport, as well as utilising zero/ultra-low emission vehicles. This is likely to result in minor positive effects upon sustainable transport through reducing the reliance on HGVs.
I/A8: Accessibility	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There is potential for developments to result in the loss of biodiversity and natural capital. As the overall design of proposals is not yet known uncertain effects have been identified. There may be opportunities to provide green infrastructure as part of design.
I/A10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	Policies could result in the development of new waste facilities and infrastructure which could negatively affect the landscape and townscape. Policy RW2 does, however, require high quality design for new waste facilities. This is to ensure the integration into local landscape settings. At this stage it is not clear on the design or location of new waste facilities and therefore uncertain effects have been identified.
I/A11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	Policies could result in the development of new waste facilities and infrastructure which could negatively affect the historic environment. Policy RW2 does, however, require high quality design for new waste facilities which could ensure the integration into local historic environment. At this stage it is not clear on the design or location of new waste facilities and therefore uncertain effects have been identified.

Policy Grouping	Reuse, Recycling and Waste							
Policy Codes	RW1, RW2, RW3							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	RW2 states that waste transport will prioritise rail and water transport over the road network. There is potential that increase waterborne transport could result in an increase in water pollution and decrease in overall water quality. At this stage the potential increase in water transport is not known, so uncertain effects have been identified.
I/A14: Air Quality	+/-	L	D	R	R	P	LT	Policy RW2 requires new waste sites to minimise air pollutants, noise, vibration, dust and odours and aims to it incorporate measures to minimise carbon emissions and maximise the use of lower-carbon energy sources. Additionally, the utilisation of zero/ultra-low emission vehicles reduces the negative impacts of new sites upon air quality. However, there is potential for negative effects from waste sites operations as their operation may increase levels of air pollutants.
I/A15: Climate Change & Resilience	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A16: GHG Emissions	+/-	L	D	R	R	P	LT	Policy RW2 results in positive effects on GHGs due to utilisation of zero/ultra-low emission vehicles and the shift towards prioritising rail and water transport over the road network. New waste sites should also minimise carbon emissions and maximise low carbon energy sources. However, there is potential for negative effects from waste sites operations as their operation may increase levels of GHGs and their construction may include significant levels of embodied carbon.
I/A17: Waste	++	M	D	R	I	P	LT	All policies within the Reuse, Recycling and Waste group result in improvements to waste management within the borough. Policy RW1 (managing our waste) preserves waste facilities within the area and maximises the capacity and efficiency of waste facilities. New development will also be expected to reuse and recycle resources, minimising waste. This policy contributes to meeting future waste management needs within the borough. Policy RW3 (waste collection facilities in new development) improves the facilities for recycling, organics, residual and bulky waste. The policy also improves the collection systems on site to encourage recycling through engagement and facilities. This is likely to reduce the amount of waste within the borough.
I/A18: Efficient use of Land	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Potential Cumulative/ Synergistic Effects	<p>Intra-plan:</p> <ul style="list-style-type: none"> There is potential for negative cumulative effects upon water quality, air quality and GHG emissions due to increased works and potential land take within the borough, however this is dependent on individual development sites that may come forward. <p>Inter-plan:</p> <ul style="list-style-type: none"> Policy D6 in the London Plan states requirements for housing to be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste. Equivalent policies stated under the Reuse, Recycling and Waste policy theme of the NLP will ensure positive cumulative effects will result. 							

Policy Grouping	Reuse, Recycling and Waste							
Policy Codes	RW1, RW2, RW3							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<ul style="list-style-type: none"> There is the potential for positive cumulative effects on Climate Change & Resilience through the implementation of NLP policies (RW2) and London Plan policies (SI7, SI8, SI9). Development proposals that demonstrate effective implementation of the waste hierarchy and its contribution to the circular economy will be supported: improving resource efficiency, preventing waste, and reducing carbon emissions. 							
Mitigation and Enhancement Measures	<ul style="list-style-type: none"> Sensitive design, as outlined in the Tower Hamlets Reuse, Recycling and Waste Supplementary Planning Document¹ should be considered for any new developments to ensure positive effects on local heritage assets and landscapes. Application of Policy PS6 should mitigate adverse effects on IIA11 (historic environment). Application of Policy BO1 will likely help to reduce effects on biodiversity and open spaces. 							
HIA and EqIA considerations	<p>EqIA</p> <ul style="list-style-type: none"> Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management. New waste facilities to be constructed and utilise existing brownfield sites to reduce negative biodiversity and landscape impacts associated with new development. <p>HIA</p> <ul style="list-style-type: none"> Reuse, Recycling and Waste policies will have some positive effects on the health determinants identified across a selection of social groups within the borough. Primarily, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions. 							
IIA Issues Addressed by Policies	<ul style="list-style-type: none"> The growing population and associated need for development is likely to increase the use of mineral resources and waste generation. Materials are a finite resource and materials will be required for new housing developments to meet the demands of a growing population. 							
Recommendations	<ul style="list-style-type: none"> Policies could benefit from emphasising the requirement to reduce waste within the borough and improve recycling rates borough wide. Policy RW2 could also benefit from acknowledging and implementing circular economy principles within the development of new waste sites. 							

¹ Tower Hamlets Borough Council (2021) Reuse, Recycling and Waste Supplementary Planning Document. Available online at: <https://talk.towerhamlets.gov.uk/rrwp>



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London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix G - Assessment of Site Allocations and
Alternatives



London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix G - Assessment of Site Allocations and Alternatives

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Introduction

This Appendix sets out the findings of both the red, amber, green (RAG) analysis and site assessments for both the Proposed Site and Alternative Site allocations.

RAG Analysis

An initial red, amber, green (RAG) assessment for both the site allocations and alternative sites was undertaken using spatial indicators for each of the IIA Appraisal Framework objectives.

Relevant data on spatial environmental, social and economic indicators, as well as those specifically relevant to health and equalities, have been loaded onto an online WebGIS platform, which has facilitated the site assessments.

It should be noted that the RAG assessment simply highlights the potential sensitivity of different indicators, it doesn't necessarily mean that the indicators are good or bad. For instance, an area of overall deprivation could be more highly sensitive to change so scored R, however, development of the site could in turn reduce levels of deprivation.

Due to this professional expertise has been used to review and validate this initial RAG rating to provide the final assessment of each site.

Site Assessments

The assessment of policies, spatial approaches and alternatives has considered the following:

- Overall effect significance (negative, positive, uncertain, potential for both negative and positive effect or negligible)
- Nature of effect (direct, indirect)
- Spatial Extent (local, regional, national)
- Reversibility of effect:
 - Reversible: The receptor can return to baseline condition without significant intervention
 - Irreversible: The receptor would require significant intervention to return to baseline condition
- Duration (short, medium or long term) – Short term: 0-5 years, Medium term: 5-10 years (up to the end of the plan period) Long term: 10+ years (beyond the plan period).

Table G-1 – Key to Assessment

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	--
Uncertain effects – Uncertain or insufficient information on which to determine the appraisal at this stage	?
Potential for both positive and negative effects	+/-
Negligible / No effect	0
Magnitude (High / Medium / Low)	H / M / L
Nature of effect (direct / indirect).	D / I
Spatial Extent (local – borough wide / regional – Greater London / national - England)	L / R / N
Reversibility of effect (reversible / irreversible)	R / I
Permanence (Permanent / Temporary)	P / T
Duration (short / medium / long term).	ST / MT / LT

It should be noted that where uncertain and negligible effects have been identified, it has not been possible to determine the nature of effect, the spatial extent, the reversibility or the duration of effect. In this instance, these cells have been left blank.

Proposed Site Allocations RAG Analysis

Due to the quantity of sites, RAG analysis results have been split into Table G-2 and Table G-3.

Table G-2 - Proposed Sites RAG Analysis results

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA1 Population Density	Amber	Amber	Red	Red	Amber	Red	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Red	Red
IIA1 Higher Education	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA1 Secondary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber
IIA1 Primary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA1 IMD Overall deprivation (LSOA)	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Red	Red	Amber
IIA2 Open Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Children Centres	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Red
IIA2 Community Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Allotments	Red	Red	Red	Green	Red	Red	Red	Green	Red	Green	Red	Red	Green	Green	Red	Green
IIA2 IMD Health (LSOA)	Amber	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red
IIA2 Life Expectancy Male	Red	Amber	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Green	Green	Red	Red
IIA2 Life Expectancy Female	Amber	Green	Amber	Red	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Red	Amber

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrip Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA2 Sport Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Healthcare Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Town Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Neighbourhood Parade	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red
IIA3/4 Primary Shopping Areas	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Red	Red
IIA3/4 Local Industrial Location	Red	Red	Green	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Tower Hamlets Activity Areas	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA3/4 Central Activities Zone	Green	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA3/4 IMD Income (LSOA)	Amber	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA3/4 IMD Employment (LSOA)	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Red	Red	Amber
IIA3/4 Strategic Industrial Locations	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green
IIA5 IMD Barriers to housing (LSOA)	Red	Red	Amber	Red	Red	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Amber
IIA5 House Price	Red	Red	Amber	Amber	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA6 Crime Rate	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA6 IMD Crime (LSOA)	Red	Amber	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA7/8 London Cycle Network	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Red	Red	Green	Green	Green	Green
IIA7/8 Tube Stations	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Red	Red	Green	Green	Red	Green
IIA7/8 Train Stations	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 PTAL	Green	Amber	Amber	Green	Green	Green	Amber	Amber	Amber	Red	Red	Red	Amber	Amber	Red	Amber
IIA7/8 Bus Stops	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 National Cycle Network	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green
IIA7/8 EV Charger Points	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA9 Priority Habitat Inventory	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Red	Amber
IIA9 SAC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SPA	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SSI	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 LNR	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 NNR	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SINC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Green Belt	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrisp Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
IIA10 Metropolitan Open Land	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Local Open Spaces	Green	Green	Red	Green	Green	Green	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green
IIA10 London View Management Framework	Red	Green	Red	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Tall Building Zone	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green
IIA10 London Squares	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Strategically Important Skyline	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Listed Buildings	Red	Red	Red	Red	Green	Red	Red	Green	Red	Green	Green	Amber	Green	Green	Red	Green
IIA11 Scheduled Monuments	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Heritage at risk	Red	Green	Green	Red	Red	Amber	Red	Amber	Green	Red	Green	Red	Green	Red	Green	Green
IIA11 Conservation Areas	Red	Green	Red	Red	Red	Red	Red	Amber	Red	Red	Green	Amber	Green	Red	Green	Red
IIA11 Parks and Gardens	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Archaeological Priority Area	Red	Red	Green	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red

Site Name	Bishopsgate Goods Yard	London Dock	Marian Place Gasworks and The Oval	Whitechapel South	London Metropolitan University	Whitechapel North	Brick Lane and Pedley Street	Bow Common Lane	Chrip Street	Ailsa Street	Leven Road	Aberfeldy Estate	Bromley by Bow (A)	Bromley by Bow (B)	Blackwall Trading Estate and Leamouth Road Depot	Hackney Wick Station
I/A12 Flood Zone	Green	Red	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red
I/A12 Flood Risk Area	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
I/A13 Water Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A13 Statutory Main River	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Amber	Green	Red	Red	Amber	Red
I/A14 NO2	Red	Red	Amber	Amber	Red	Amber	Amber	Green	Amber	Red	Green	Red	Amber	Amber	Red	Green
I/A14 PM10	Amber	Amber	Amber	Amber	Red	Green	Green	Green	Green	Amber	Green	Red	Amber	Amber	Red	Green
I/A14 Air Quality	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Red	Green	Green	Green	Green
I/A15 Climate Risk	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A15 Heat Risk	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A17 Safeguarded Wharves	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Table G-3 - Proposed Sites RAG Analysis results

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
I/A1 Population Density	Red	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
I/A1 Higher Education	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber
I/A1 Secondary Schools	Amber	Amber	Green	Green	Green	Green	Amber	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber	Amber
I/A1 Primary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A1 IMD Overall deprivation (LSOA)	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber
I/A2 Open Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Children Centres	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Green	Red	Green	Green	Red	Red	Green
I/A2 Community Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Allotments	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Red	Red	Red	Green	Green	Red	Red
I/A2 IMD Health (LSOA)	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Red	Amber	Amber	Amber
I/A2 Life Expectancy Male	Red	Red	Red	No data	No data	Green	Green	Green	No data	No data	No data	Green	No data	No data	Green	No data	No data
I/A2 Life Expectancy Female	Amber	Amber	Red	No data	No data	Green	Green	Green	No data	No data	No data	Green	No data	No data	Green	No data	No data
I/A2 Sport Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
I/A2 Healthcare Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
IIA3/4 Town Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Neighbourhood Parade	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
IIA3/4 Primary Shopping Areas	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Local Industrial Location	Green	Green	Green	Green	Green	Red	Red	Green	Red	Red	Green	Green	Red	Red	Green	Red	Red
IIA3/4 Tower Hamlets Activity Areas	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Amber	Amber	Amber	Green	Green	Amber
IIA3/4 Central Activities Zone	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA3/4 IMD Income (LSOA)	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Red	Amber	Amber	Amber
IIA3/4 IMD Employment (LSOA)	Amber	Amber	Red	Red	Green	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber
IIA3/4 Strategic Industrial Locations	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA5 IMD Barriers to housing (LSOA)	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA5 House Price	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA6 Crime Rate	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA6 IMD Crime (LSOA)	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber	Amber	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
IIA7/8 London Cycle Network	Red	Green	Red	Red	Green	Green	Red	Red	Green	Red	Red	Red	Green	Red	Red	Red	Red
IIA7/8 Tube Stations	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green
IIA7/8 Train Stations	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 PTAL	Amber	Red	Amber	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber	Green	Red	Amber	Green	Green
IIA7/8 Bus Stops	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 National Cycle Network	Green	Red	Red	Red	Red	Red	Red	Red	Green	Green	Red	Red	Red	Red	Red	Red	Red
IIA7/8 EV Charger Points	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA9 Priority Habitat Inventory	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber
IIA9 SAC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SPA	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SSI	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 LNR	Green	Green	Green	Green	Green	Red	Amber	Amber	Amber	Amber	Green	Green	Amber	Amber	Green	Amber	Amber
IIA9 NNR	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SINC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Green Belt	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Metropolitan Open Land	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Local Open Spaces	Green	Red	Red	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
IIA10 London View Management Framework	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Tall Building Zone	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA10 London Squares	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Strategically Important Skyline	Green	Green	Green	Green	Red	Green	Green	Red	Red	Green	Red	Green	Red	Green	Red	Red	Red
IIA11 Listed Buildings	Green	Green	Amber	Amber	Amber	Green	Green	Green	Green	Green	Red	Green	Red	Green	Amber	Green	Red
IIA11 Scheduled Monuments	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Heritage at risk	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Conservation Areas	Red	Red	Red	Red	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green
IIA11 Parks and Gardens	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Archaeological Priority Area	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA12 Flood Zone	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
IIA12 Flood Risk Area	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA13 Water Spaces	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site Name	Hepscott Road	Sweetwater	Teviot Estate	Aspen Way	Billingsgate Market	Crossharbour	Limeharbour	Marsh Wall East	Marsh Wall West	Millharbour	North Quay	Reuters	Riverside South	Westferry Printworks	Wood Wharf	10 Bank Street	Westferry and Park Place
IIA13 Statutory Main River	Green	Red	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA14 NO2	Green	Green	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Green	Amber
IIA14 PM10	Green	Green	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Green
IIA14 Air Quality	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
IIA15 Climate Risk	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Amber	Green	Red	Amber	Green	Amber
IIA15 Heat Risk	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Red	Amber	Amber	Amber
IIA17 Safeguarded Wharves	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Proposed Site Allocations Assessment Summaries

Bishopsgate Goods Yard

Table G-4 - Bishopsgate Goods Yard

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 500 new homes, of which at least 35% will be affordable and the development will include wheelchair adaptable homes (number of which is tbc). In addition, there will be new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. The existing 5-a-side football pitches currently located on the site will be lost as part of development - it is not clear at this stage whether these will be re-provisioned elsewhere in the borough.
I/A2: Human Health	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, leisure facility, healthcare facilities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site will include a maximum of 11,500sqm of non-residential uses such as retail, workspace, community and cultural. This will include the provision of a leisure facility and an Idea Store, as well as public realm improvements at the ground and platform level. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The site will include employment space/ workshops as well as retail. It is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely increase employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	++	H	D	R	I	P	LT	The provision of 500 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include 10% wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having Public Transport Accessibility Levels (PTAL) scores ranging between 5 and 6b. Other than public realm improvements and increased wayfinding, there are no plans for additional transport provision.
IIA8: Accessibility	++	H	D	R	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to walking and cycling routes to and from the site will establish better connections with Shoreditch High Street Overground station, Brick Lane District Centre, Shoreditch Triangle and the new open space, and will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	++	M	D	R	I	P	LT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide a significant increase in greenspace and GI, through the provision of open space (with a minimum size of one hectare) integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park located above the Braithwaite Viaduct.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape. The site is located within two London View Management Framework (LVMF) areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Pauls Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary negative effects to the local landscape and townscape setting during construction.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within an archaeological priority area, and partially located in the South Shoreditch, Redchurch Street and Brick Lane and Fournier Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The proposed site aims to restore and repair the existing Grade II listed Braithwaite Viaduct and adjoining structures. Enhancement to the public realm will also help to improve the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
I/A14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
I/A15: Climate Change & Resilience	+	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more green infrastructure (GI) and open space will help to reduce the Urban Heat Island (UHI) effect. The inclusion of sustainable drainage systems (SuDS) is expected, however specific details are not known at this stage. The design of the scheme will include measures to prevent overheating.
I/A16: GHG Emissions	+/-	M	D	L	I	P	LT	There are likely to be significant greenhouse gases (GHG) emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The scheme is expected to make use of Air Source Heat Pumps and be delivered via an electricity-led strategy. Buildings are expected to be energy efficient to reduce reliance on heating.
I/A17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
I/A18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it will result in the loss of the 5-a-side pitches. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Bishopsgate Goods Yard							
Site Capacity	500							
Site Source	Existing allocation							
Site Status	Outline Consent Granted							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA1/2: If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Brick Lane and Pedley Street site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Brick Lane and Pedley Street site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archology from both this site and the Brick Lane and Pedley Street site.</p> <p>IIA14: If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Brick Lane and Pedley Street site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Brick Lane and Pedley Street is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/17: The 5-a-side football pitches should be re-provisioned elsewhere in the borough, to avoid a loss in community facilities.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum urban greening factor (UGF) and biodiversity net gain (BNG) targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the Construction Environmental Management Plan (CEMP). The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and Operational Environmental Management Plan (OEMP).</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Table G-5 - London Dock

Site Name	London Dock							
Site Capacity	1800							
Site Source	Existing allocation							
Site Status	Consented, under construction.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The development as a whole could deliver up to 1,800 new homes of which a minimum of 35% will be affordable homes. It will be a mixed-use, predominantly residential development. This will include offices, restaurants, shops and a school within twelve multi storey buildings and a one to two storey basement across the footprint of the site. At least 10% of homes will be wheelchair accessible and adaptable. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. This includes Shadwell DLR station and Shadwell train station both, of which, are wheelchair accessible and within 1km of the site as well as nearby bus stops.
IIA2: Human Health	++	H	D/I	R	I	P	LT	As well as housing, the site includes up to 21,500sqm of non-residential floorspace which will provide new retail and employment opportunities, healthcare facilities new secondary school, new parks and open spaces and improvements to the public realm. It is also located within close proximity to existing healthcare and leisure facilities, as well as open spaces which includes Swedenborg Gardens and St George's Gardens that are under 0.5km away which would encourage walking and cycling. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. Homes that are made accessible and adaptable for disabled and wheelchair users would, therefore, increase human health. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	At present the site is located near to central activities zones which includes St Mellons Business centre and primary shopping areas as well as town centres. The development's provision of non-residential floor space such as those which support offices, restaurants and shopfronts. Considering this site is located in the 30-50% most employment deprived and 10-20% income deprived areas, the development will result in a significant increase in the number and diversity of jobs and will improve and enhance connectivity between business clusters and the housing market.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	Considering this site is located in the 30-50% most employment deprived and 10-20% income deprived areas, the development will result in a significant increase in the number and diversity of jobs and will improve and enhance connectivity between business clusters and the housing market. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 1800 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and at least 10% will include wheelchair accessible and adaptable homes. The size, type and tenure of housing takes into account different

Site Name	London Dock							
Site Capacity	1800							
Site Source	Existing allocation							
Site Status	Consented, under construction.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.
IIA6: Crime & Safety	+	M	D	L	R/I	P/T	ST/LT	The site is currently located within an area of moderate crime deprivation (30-50% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	R	I	P	LT	The site is well located to local facilities and services such as bus, rail and underground services within 0.8km and has a PTAL score between 2 and 4. Moreover, other than public realm improvements of pedestrian, cycle paths and increased wayfinding, there are no plans for additional transport provision.
IIA8: Accessibility	++	H	D	R	I	P	LT	The site already includes a range of facilities, and the proposal includes further provision for community facilities and services. Improvements to pedestrian, cycling and wayfinding will provide better access to the Thomas More Neighbourhood Centre, St Katharine Docks, Tobacco Dock and the Wapping Canal, and to improve walking and cycling connections across the Highway for all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. The site will also provide safe access routes to the new secondary school.
IIA9: Biodiversity & Natural Capital	++	H	D	L	R/I	P	LT	The proposed landscaping will provide a good diversity of nectar-rich flowers, including some night-scented species, which will provide forage for bees and other pollinators and contribute to Local Biodiversity Action Plan (LBAP) objectives. Priority habitats are located to the East (Wapping Woods), North-East (St George's Gardens) and south of the site (Wapping Gardens). On-site landscaping and green roofs proposed under this development are expected to provide a significant net gain in biodiversity, outweighing any potential adverse effects via overshadowing.
IIA10: Landscape & Townscape	+	H	D	L	R/I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm, particularly along the Highway and Vaughan Way, will enhance the quality and condition of the townscape and landscape. Overlooking from residential plots into the school playground would be controlled with high screens and dense vegetation. These would provide a barrier between the school and its surroundings at all levels. The screens are planted with species which would assist in improving the air quality and biodiversity of the area.
IIA11: Historic Environment	+/-	M	D	L	R/I	P/T	ST/LT	The Grade II listed Pennington Street Warehouse is located directly south east of the site. The site also falls to the west of the Tower of London, which is designated as a World Heritage Site. The site is located in close proximity to numerous conservation areas and within an archaeological priority area. A Scheduled monument (Roman Bath House, Shadwell) is also located to the east of the site. The proposed site aims to repair and modify the existing Grade II listed warehouse and adjoining structures. Enhancement to the public realm will also help to improve the setting of the historic environment. There is

Site Name	London Dock							
Site Capacity	1800							
Site Source	Existing allocation							
Site Status	Consented, under construction.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								potential of disturbance to archaeology from excavation works during construction and for construction works to adversely affect local heritage assets.
IIA12: Flooding	-	H	D	L	I	P	LT	The site is situated in a flood risk area classing the development as more vulnerable as it sits in flood zone 3. Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment and the sequential test.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	M	D	L	R/I	P/T	ST/LT	Air quality at this site has moderate levels of NO ₂ and PM ₁₀ and sits within an Air Quality Management Area (AQMA). The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. It is assumed that additional mitigation strategies will be incorporated considering the development of a secondary school on the site. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a medium to high overall climate risk and heat risk rating. Whilst the addition of more GI, open space and green roofs will help to reduce the UHI effect, not all climate resilience measures are known at this stage. The site is also situated in a flood risk area classing the development as more vulnerable as it sits in flood zone 3
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development is expected to make use of decentralised energy and solar PV, as well as incorporate energy efficient measures to reduce energy needs. Further design details are still required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	London Dock							
Site Capacity	1800							
Site Source	Existing allocation							
Site Status	Consented, under construction.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA1/2: If construction of this site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site will significantly increase the number of businesses and jobs.</p> <p>IIA5: In combination, this site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the neighbouring Tobacco Dock site</p> <p>IIA14: If construction of this site and the Tobacco Dock were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of this site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 10% accessible homes. A range of housing options to suit all housing needs within the community is necessary in line with policies HF1 and HF2. Development specific EqIAs should be undertaken to ensure inclusive housing is delivered.</p> <p>IIA1/2: Further assessment of part of scheme level design should incorporate an evaluation of the provision of healthcare to ensure that the current supply is sufficient in supporting new communities. The application of policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3: Where the site is located adjacent to a designated town centre, policies TC1-TC8 will ensure that development outside of the town centre will not detrimentally impact on the existing town centre, allowing centres to remain vibrant and sustainable and demonstrating vitality.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features and heritage assets.</p> <p>IA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: Development should be delivered in line with policy CG6, the NPPF and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Marian Place Gasworks and the Oval

Table G-6 - Marian Place Gasworks and the Oval

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	This site will provide up to 700 new homes of which 35% will be affordable housing. The development will also include 55 wheelchair accessible homes. In addition, the site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. This will also include 1.0 hectares of publicly accessible open space. The site will include new retail and employment opportunities and has current access to healthcare and community facilities; however, no new healthcare facilities are proposed for this site.
IIA2: Human Health	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health. As well as housing, the site includes a minimum of 4,000sqm of new non-residential floorspace, which will provide new retail and employment opportunities, and supports urban greening through the provision of new parks and open spaces to encourage and improvements to the public realm. It is noted that no new healthcare facilities are included within the development. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site will include active uses through the formation of new shopfront openings and public realm improvements at the ground floor level. The site will prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The site is not located within a main town centre; therefore, any main town centre uses must ensure they do not impact on the vitality of existing high streets. The site will provide a range of office, industrial and studio workspaces meeting the needs for businesses serving a more local need, start-ups, small to medium enterprises and creative industries.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The site will provide a minimum of 4,000sqm of new non-residential floorspace which will include employment space, in particular for start-ups, small and midsize enterprises (SMEs) and creative industry businesses, as well as retail, supporting further job opportunities in the area. The site will provide a range of office, industrial and studio workspaces meeting the needs for businesses serving a more local need, start-ups, small to medium enterprises and creative industries, therefore diversifying the labour market. The site is outside the Activity Area, and so will improve employment opportunities within the locality. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of up to 700 new homes will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities. In addition, the site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.
IIA6: Crime & Safety	+	M	I	L	R/I	P/T	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied. The site will include a range of uses and improving public realm including active uses at ground floor level, which will improve overall natural surveillance. Overall, it is considered that the development of the site will inherently improve the perception of safety within the area. The increase of passive surveillance and public foot and cycle traffic, through and around the site, will significantly improve the security of the area.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site has very good access to sustainable transport as it is located in close proximity to Cambridge Heath station, Bethnal Green underground station, a number of bus stops and a cycle hire scheme, as reflected in a PTAL score between 4-6a. The site includes a new cycle and pedestrian network around the perimeter to improve connectivity with the Cambridge Heath Neighbourhood Centre and along the waterfront at the Regents Canal. Long-stay cycle parking spaces will also serve the site.
IIA8: Accessibility	++	H	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. It is expected that improvements to wayfinding across the site including Legible London Signage which will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel due to improvements in connectivity with the Cambridge Heath Neighbourhood Centre and along the waterfront at the Regents Canal.
IIA9: Biodiversity & Natural Capital	+/-	M	D	R	R	P	LT	There are no statutory nor non-statutory designated sites of nature conservation interest within or adjacent to the development site. The Northern boundary of the development site adjoins Regent's Canal, which forms part of the London's Canals Site of Importance for Nature Conservation (SINC). The site is also located in close proximity to a number of other SINC's. The development site mainly comprises of areas of extension existing hardstanding and bare ground, with large areas devoid of any vegetation cover and a limited range of species. It is assumed that the potential impacts from pollution are avoided through good construction practice. The green roofs, landscaping and other biodiversity features will enhance the biodiversity of the site. In addition, all proposals for development within the site allocation will look to contribute to an overall provision of 1ha of new public open space

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								across the allocation as a whole, delivered through a number of smaller open spaces and pocket parks. This could help to increase biodiversity on site.
IIA10: Landscape & Townscape	+/-	H	D/I	L	R/I	P/T	ST/LT	The site aims to achieve high quality sustainable design for buildings, spaces and 1ha of publicly accessible public realm, which will improve the quality and condition of the townscape and landscape. The site is located within the alignment of the background Wider Setting Consultation Areas of the LVMF SPG views from West Minster Pier to St Paul's and the Queen's Walk to Tower of London. The development will re-use The Oval (which is designated as Local Open Space and Identified as a London Square) as a new public open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction.
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is partially located in the Regent's Canal Conservation Area, and Adjacent to the Hackney Road Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. The proposed site will be built upon the existing gas holders, the guide frames no.2 and no.5 of which are located within and contribute positively to the Conservation Area; however, they are subject to a Certificate of Immunity from Listing and considered as non-designated heritage assets. Guide frames will be refurbished to ensure their long-term future, the proposed buildings will pay homage to the gasholder shapes and forms to reflect the industrial legacy of the site. Enhancement to the public realm will also help to improve the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+	M	D/I	L	R/I	P/T	ST/LT	The site is located in an area which has a high overall climate risk and heat risk rating. During construction and operation, the site will have a minor adverse residual effect on GHGs. The addition of more GI and open space will help to reduce the UHI effect. SuDS are expected to be delivered within the works at the site.
IIA16: GHG Emissions	+	M	D/I	L	R/I	P/T	ST/LT	During construction and operation, the site will have a minor adverse residual effect on GHGs. The building fabric of the Proposed Development will incorporate energy efficient design and support opportunities for renewable energy production

Site Name	Marian Place Gasworks and the Oval							
Site Capacity	700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage, it is not clear the extent of re-use and re-cycling of materials.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The site includes brownfield land. The site will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Devons Road.</p> <p>IIA1/2: If construction of this site and the Devons Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Devons Road site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Devons Road site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Devons Road.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Devons Road.</p> <p>IIA14: If construction of this site and the Devons Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Devons Road site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Devons Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Devons Road is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further Assessment as part of the scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that current supply is sufficient in supporting new communities.</p> <p>IIA6: The development should be designed in accordance with the Secured by Design Principles and Policies PS3 and PS4.</p> <p>IIA9: Other policies in the Local Plan should help to avoid potential negative effects, e.g. Policies BO1, BO2, BO3, BO and BO5. The site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Table G-7 - Whitechapel South

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	L	I	P	LT	<p>The site will provide 837 new homes and has potential to provide at least 425 new rooms for students, which will work positively towards achieving the borough's housing target. The provision of student accommodation is harmonious with the position of the Queen Mary University of London campus. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the third most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public. Overcrowding is significant at this location, with 19965p/h compared to the borough average of 15,695p/h. The provision of communal amenity space under this development would be beneficial to residents. These units have the potential to benefit both students and the wider community, by delivering other priorities such as affordable housing. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>The site safeguards an existing health facility (Royal London Hospital) within the allocation and is also located within close proximity to other existing healthcare and leisure facilities. The site will also provide an NHS primary health care facility (including the reprovision of the existing sexual health and other services).</p> <p>As well as housing and healthcare, the site includes 93,000sqm non-residential floorspace, which will provide new retail and employment opportunities, and supports urban greening through the provision of open spaces to encourage and improvements to the public realm.. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.</p> <p>The site does have good access to healthcare and community facilities; however, it is not clear whether the current provision will meet the needs of the new student population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.</p>

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as within part of Whitechapel's bustling town centre and thriving night-time economy. The new town hall in Whitechapel and permanent Residents' Hub supports town centre revival. The site lies within Whitechapel district centre, with both Whitechapel High Street and Whitechapel Market designated as Conservation Areas. The High Street is characterised by small-scale retail and industrial enterprises, and the Market is one of the borough's main local shopping areas. The site will improve town centre viability, with main town centre uses and employment led development proposed within the site including the formation of new shopfront openings and public realm improvements. These measures can support the strategic role of Whitechapel as an emerging hub for life sciences, bio-tech and digital industries.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The site is within the Whitechapel Local Employment Location with an emerging creative, digital, and ICT hub. It is well located to existing employment areas including the City Fringe Activity Area and the Central Activities Zone. The proposal of an economic led development will provide 93,000sqm of non-residential floorspace which will increase employment opportunities, in particular within the life sciences sector. The site will also provide improved access to existing employment opportunities in the surrounding area. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	L	I	P	LT	The site provides a net gain of over 500+ dwellings, and therefore is sufficient enough to contribute to meeting LBTH's housing supply targets. The site will meet the minimum 35% target of affordable homes. This is beneficial considering its location within a high house price ward. However, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and antisocial behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport, enhanced by the nearby Elizabeth Line station, acting as a catalyst for investment within the ward. This is reflected by the site having a PTAL score ranging between 6a and 6b. The site will enhance connections to the Whitechapel North site allocation, Whitechapel High Street, as well as improved accessibility to the north and south and east and west of the site.

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	L	I	P	LT	The site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. This is particularly important for students who don't have access to their own private car. The site will enhance connections to the Whitechapel North site allocation, Whitechapel High Street, as well as improved accessibility to the north and south and east and west of the site. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	++	M	D	R	R	P	LT	The site will provide improvements to the green grid should be provided along Whitechapel High Street, Stepney Way, New Road, and Cavell Street, along with good quality connections to surrounding green grid routes. The development should contribute to the delivery of a new and improved green open space (the Green Spine) stretching from Philpot Street to the new civic centre. Where opportunities exist, development will be expected to consolidate and integrate the consented open space with the new Green Spine to maximise its multi-functional use. This will help to significantly increase biodiversity on site.
IIA10: Landscape & Townscape	+/-	H	D/I	L	R/I	P/T	ST/LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The site will contribute to the delivery of the Green Spine (new green open space) stretching from Philpot Street to the new civic centre, which will help to improve visual amenity.
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within the Mile End Archaeological Priority Area (APA), and partially within the London Hospital Conservation Area that is listed on the Heritage at Risk Register. There are also a number of listed buildings within the site allocation, with the potential for a locally listed building to be brought back into use. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration; however, this is dependent on scale, massing, layout and materials. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts on the setting of the London Hospital Conservation Area.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
I/A15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage.
I/A16: GHG Emissions	+/-	M	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development is expected to be provided with a heat network and enhanced building fabric is expected to reduce energy consumption.
I/A17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction to align with circular economy principles.
I/A18: Efficient use of Land	+	H	D	L	I	P	LT	The site includes brownfield land. The site will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North and Watney Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward.</p> <p>IIA1/2: If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents. It is unknown if the existing population will respond positively to an increased student population in the area.</p> <p>IIA3/4: In combination, this site and the Whitechapel North and Watney Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents, whilst stimulating the economy and town centre of Whitechapel.</p> <p>IIA5: In combination, this site and the Whitechapel North and Watney Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of overcrowding and affordability.</p> <p>IIA10: If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel North and Watney Market site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Whitechapel North and Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Whitechapel North and Watney Market site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Whitechapel North and Watney Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel North and Watney Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							

Site Name	Whitechapel South							
Site Capacity	837 (+ 425 student rooms)							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable homes and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities, and specifically the new student population. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4, especially in relation to concerns of noise and ASB potentially generated by the new student population.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-8 - London Metropolitan University

Site Name	London Metropolitan University							
Site Capacity	520 student rooms							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site has potential to provide at least 520 new rooms for students, which will work positively towards achieving the borough's housing target. However at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration.</p> <p>The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will provide an additional 33,500 sqm of educational floorspace. However, it is unknown whether this will be open to the public.</p> <p>These units will however, only benefit students and the delivery may compromise the ability to deliver other priorities, in particular affordable housing and facilities which will benefit the wider community. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.</p>
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new student population as well as the wider community. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.</p>
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the town centre. However, there are some businesses located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units may be a key concern.</p>
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely improve access for residents to employment opportunities. There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site has potential to provide at least 520 new rooms for students, which whilst this work positively towards achieving the borough's housing target, it will only benefit students and may compromise the ability to deliver affordable housing.</p>

Site Name	London Metropolitan University							
Site Capacity	520 student rooms							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7:Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL score of 6b. The site will help to improve walking and cycling routes to the underground stations at Aldgate and Aldgate East, Whitechapel High Street and to the north of the site at Wentworth Street.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The site will help to improve walking and cycling routes to the underground stations at Aldgate and Aldgate East, Whitechapel High Street and to the north of the site at Wentworth Street. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	+	M	D	R	R	P	LT	Due to the small size of this site, it cannot fulfil the requirement of policy DV8(1)(e) to provide 0.4ha of publicly accessible open space. Development on the site will aim instead to provide smaller 'pocket parks' of publicly accessible open space and an improved public realm. Although it may not achieve a minimum 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) compared with the pre-development baseline on site, there is potential for the addition of some small habitats.
IIA10: Landscape & Townscape	+/-	H	D/I	L	R/I	P/T	ST/LT	The site is located within two LVMF areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Paul's Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary, negative effects to the local landscape and townscape setting during construction. Improved public realm and active frontages should be provided at principal entrances to key buildings, including along the Whitechapel High Street frontage, Goulston Street, and Old Castle Street. Due to the small size, the site aims to provide small 'pocket parks' of publicly accessible open space. This will help to enhance the quality and condition of the townscape and landscape within the area.

Site Name	London Metropolitan University							
Site Capacity	520 student rooms							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within the Aldgate and Portsoken APA, and partially located opposite the Wentworth Street and Whitechapel High Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts. This includes ensuring no negative impact on the backdrop of the view of the Tower of London, and the adaptive re-use of existing locally listed buildings to be explored.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands), allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	M	D	L	I	P	LT	Overall climate risk is medium and the overall heat risk is high. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density student housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	London Metropolitan University							
Site Capacity	520 student rooms							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA1/2: If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA1/6: The site is located in close proximity to existing student accommodation on Whitechapel High St and Leman St which in combination with this site may cumulatively have adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour.</p> <p>IIA3/4: In combination, this site and the Brick Lane and Pedley Street site will significantly increase the number of business and jobs.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Brick Lane and Pedley Street.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Brick Lane and Pedley Street site.</p> <p>IIA14: If construction of this site and the Brick Lane and Pedley Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Brick Lane and Pedley Street site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Brick Lane and Pedley Street is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least deliver a minimum of 50% of units as affordable student accommodation in line with policy HF6.</p> <p>IIA1: The site should provide 10% of student rooms which are wheelchair accessible and adaptable, including access to a wheelchair-accessible shower room for independent use in line with policy HF6.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum urban greening factor UGF and BNG targets (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife) set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Whitechapel North

Table G-9 - Whitechapel North

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	M	D	L	I	P	LT	The site will provide 1,225 new homes, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the third most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. Swanlea Secondary School sits on the border of the site, facilitating access to education. The site will enhance the NHS primary healthcare facility, re-provide and enhance the leisure centre, and provide a new community facility. At this location, issues of overcrowding are lower than the borough average. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
I/A2: Human Health	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, including Whitechapel Sports Centre and a pharmacy. The site will enhance the NHS primary healthcare facility, re-provide the leisure centre, and provide a new community facility .
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as within part of Whitechapel's bustling town centre and thriving night-time economy. The new town hall in Whitechapel and permanent Residents' Hub supports town centre revival. The site lies within Whitechapel district centre, with both Whitechapel High Street and Whitechapel Market designated as Conservation Areas. The High Street is characterised by small-scale retail and industrial enterprises, and the Market is one of the borough's main local shopping areas. The site will provide a minimum of 4,500sm of retail space which will help to improve the viability of the town centre. The addition of market facilities as part of the proposed site, including the provision of parking, will help to provide further employment opportunities within the area as well as improving social cohesion of the town centre.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. This will likely improve access for residents to employment opportunities. The proposed site will provide at least 4,500sqm of retail space which will increase employment opportunities, There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	L	I	P	LT	The provision of 1,225 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail, with the Elizabeth Line station situated beneath the site. This is reflected by the site having PTAL scores ranging between 6a and 6b. Active transport is also encouraged via the London Cycle Network, central within the site. The site will enhance connections to the Whitechapel South site allocation Whitechapel High Street, Vallance Road, and Brady Street, along with good quality onward connections to surrounding green grid routes such as that along Old Montague Street. Parking for the re-provided supermarket will be provided in a way which minimises the negative impact on the public realm and on primary routes for pedestrians and cyclists.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The site will enhance connections to the Whitechapel South site allocation Whitechapel High Street, Vallance Road, and Brady Street, along with good quality onward connections to surrounding green grid routes such as that along Old Montague Street. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from any designated sites, however, there is potential for some adverse effects on some neighbouring small-scale habitats such as deciduous woodland during construction. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development likely improve townscape and landscape setting.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has a number of heritage assets within its vicinity is predominantly located within the London to Colchester Roman Road TH APA, and partially within the Whitechapel Market Conservation Area. There are two Grade II listed buildings within the site allocation. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site will aim to protect or enhance heritage assets and mitigate any negative impacts. This includes the repairing and

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								incorporating the locally listed building to the north of the Vallence Road within the development.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will also be a temporary negative effect on air quality due to dust generation and emissions from construction of the re-provisioned community facilities. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is predominantly on previously developed land will support the protection of the borough's green spaces. The site will support 1,225 new homes which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel South and Watney Market.</p> <p>IIA1/2: If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Whitechapel South and Watney Market site will significantly increase the number of businesses and jobs.</p> <p>IIA5: In combination, this site and the Whitechapel South and Watney Market site will significantly increase housing stock.</p> <p>IIA10: If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for a negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel South and Watney Market site.</p> <p>IIA14: If construction of this site and the Whitechapel South and Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Whitechapel South and Watney Market site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Whitechapel South and Watney Market site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel South and Watney Market is likely to result in a cumulative increase in waste.</p>							

Site Name	Whitechapel North							
Site Capacity	1225							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Brick Lane and Pedley Street

Table G-10 - Brick Lane and Pedley Street

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	L	I	P	LT	<p>The proposed site will provide the 800 homes as well as up to 33,000sqm of non-residential floorspace to include a five storey office building with ground floor and first floor commercial units and two storey basement for provision of plant, servicing, storage and a gym. This will work positively towards achieving the borough's housing target It is currently unknown how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is very high so affordability needs to be a key consideration.</p> <p>The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The proposed site will also provide new small public open spaces, such as pocket parks, and improvements to the public realm.</p>
IIA2: Human Health	+	M	D	L	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and additional provisions, however the site will provide new community facilities, enhancements to the public realm and improved connectivity to Allen Gardens, the Truman Brewery Estate and Shoreditch High Street station.</p>
IIA3: Economy & Town Centres	++	H	D	L	I	P	LT	<p>The site is currently located near to the City Fringe Activity Area and Central Activity Zone, as well as being close to Spitalfields bustling town centre, market and thriving night-time economy. The site will provide a minimum of 33,000sqm of non-residential floorspace to include a five storey office building with ground floor and first floor commercial units and two storey basement for provision of plant, servicing, storage and a gym. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p>
IIA4: Employment & Skills	++	H	D	L	I	P	LT	<p>The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site will provide a minimum of 33,000sqm of non-residential floorspace. This will likely improve access for residents to employment opportunities. There are a number of small businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	+	M	D	L	I	P	LT	The provision of 800 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6b. Improvements to walking and cycling connections will be provided to connect up Allen Gardens, the Truman Brewery estate, and Shoreditch High Street station. The site will also improve north-south and east-west connections through the existing large number of street bocks currently within the site, such as the Grey Eagle Street car park, the Truman Brewery estate, and the railway lines in the north of the site to improve connectivity.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. Improvements to walking and cycling connections and wayfinding will be provided to connect up Allen Gardens, the Truman Brewery estate, and Shoreditch High Street station. The site will also improve north-south and east-west connections through the existing large number of street bocks currently within the site, such as the Grey Eagle Street car park, the Truman Brewery estate, and the railway lines in the north of the site to improve connectivity. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	-	M	D	L	R/I	P/T	ST/LT	Allen Gardens falls within the Site boundary. Whilst this is designated as an area of open space it is likely to contain some small-scale habitats. There is potential for construction at the site to result in disturbance to this site, local habitat and species, through the inclusion of public open spaces and pocket parks. At this stage BNG is assumed but whether the site BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	+/-	H	D/I	L	R/I	P/T	ST/LT	The site is located within two LVMF areas - Westminster Pier to St Paul's Cathedral and King Henry VIII's Mound to St Pauls Cathedral. Development will need to be sensitive to these views and avoid obstruction and enhance the setting. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. The site will provide improvements to the public realm through the provision of new small public open space. Improvements to the public realm in this area will also include additional street lighting, wayfinding, and street furniture, to create a sense of place.

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within an archaeological priority area, and partially located in the Brick Lane and Fournier Street and Whitechapel High Street Conservation Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The impact of development on nearby heritage assets and conservation areas will be considered. The site will aim to protect and enhance heritage assets, in particular the character of the Fournier Street Conservation Area should be preserved and, where possible, enhanced
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a medium to high overall climate risk and heat risk rating. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is predominantly on previously developed land and will support high density housing, making the most efficient use of the land. It is assumed that the site will encourage the use of sustainable materials, however full realisation of the details is not yet available.

Site Name	Brick Lane and Pedley Street							
Site Capacity	800							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Bishopsgate Goods Yard.</p> <p>IIA1/2: If construction of this site and the Bishopsgate Goods Yard site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Bishopsgate Goods Yard site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Bishopsgate Goods Yard site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Bishopsgate Goods Yard.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Bishopsgate Goods Yard site.</p> <p>IIA14: If construction of this site and the Bishopsgate Goods Yard site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Bishopsgate Goods Yard site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Bishopsgate Goods Yard is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable homes and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with Policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: Phase 1 habitat surveys should be undertaken to determine if there are any habitats/ species residing in Allen Gardens.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Bow Common Lane

Table G-11 - Bow Common Lane

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	+/-	H	D	R	I	P	LT	The site will provide 1000 new homes, helping towards meeting LBTH's housing target. The ward sits in the second most deprived decile, meaning the high proportion of affordable housing at this site has potential to bring positive effects due to the wards high levels of deprivation. The further construction of tall buildings however, will exacerbate existing problems of overcrowding at this site. Overcrowding is significant at this location, with 20605p/h compared to the borough average of 15,695p/h. The provision of communal amenity space under this development will be beneficial to residents. There are also plans to develop a new sixth form centre, provide new retail and employment opportunities, and bring about improvement to the public realm through the enhancement of Bow Common.
I/A2: Human Health	+	H	D	R	I	P	LT	As well as housing, the site includes 2,500sqm of new retail and employment opportunities, new cultural and community facilities, and improvements to open space and public realm. The sites provision of new facilities and enhancement of existing spaces will improve physical and mental health and wellbeing and reduce levels of loneliness. Tall buildings shortcoming to provide a sufficient quantity of open space for all residents may limit the sites potential to provide accessible greenspace to all.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	As of present, the site is not located in or near a Central Activity Zone or Primary Shopping Area. As such, the developments provision of non-residential floor space such as those which support small to medium enterprise; including creative industries and retail will be highly beneficial to the local economy.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The sites inclusion of 2,500sqm employment space (Class B1) as well as retail will take the form of flexible commercial space, enabling a wide range of small to medium enterprises to set up here. This will generate a mix of commercial activity across the area that will in turn create a range of employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	++	H	D	R	I	P	LT	The provision of 1000 new homes will help towards meeting LBTH's housing target, including the provision of affordable housing At least 35% of all units will be affordable and 10% will include wheelchair accessible and adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	M	D	R	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	R	I	P	LT	Despite average PTAL scores (2-3) the site has relatively good access to public transport, with bus stops located in close proximity to the site on Bow Common Lane and Devons Road. Providing better wayfinding may also help to encourage more people to walk and cycle.
IIA8: Accessibility	++	H	D	R	I	P	LT	The site already includes a range of facilities, and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	H	D/I	R	I	P	LT	The site sits immediately south-adjacent to Tower Hamlets Cemetery Park Local Nature Reserve (LNR) and SINC, which contains priority habitat of 'created' chalk grassland, a habitat for particular invertebrates, including the Priority Species Small Blue butterfly. The addition of tall buildings at this Site will likely negatively affect the biodiversity present through overshadowing and increased visitors to the park. On-site landscaping and green roofs proposed under this development are expected to provide a significant net gain in biodiversity, outweighing any potential adverse effects via overshadowing.
IIA10: Landscape & Townscape	+	M	D	R	I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	-	H	D/I	R	R/I	P/T	ST/LT	The site does not lie within a conservation area or contain any statutory listed buildings. Tower Hamlets Cemetery Park located north adjacent to the Site comprises a Conservation Area and an Archaeological Priority Area. The site seeks the demolition of the locally listed building present in this area. During construction there is also potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	+	L	I	L	R	T	MT	The use of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers.
IIA13: Water Quality	+	L	I	L	R	T	MT	Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site outlines a car free development other than seven accessible parking spaces which will reduce private vehicle usage and encourage public transport usage amongst residents. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI including green roofs and open space will help to reduce the UHI effect. It is expected that measures for SuDS and minimising overheating will be delivered through the design of buildings and public spaces. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The proposed development seeks to implement energy efficiency measures and renewable energy technologies to deliver CO ₂ emission reductions. Further design details are required to fully assess the GHG reduction potential of these measures.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	++	H	D	R	I	P	LT	The development proposes to replace a vacant brownfield, former utilities site and will support the protection of the borough's green spaces. The sites function as high density housing will help to make the best use of the space.

Site Name	Bow Common Lane							
Site Capacity	1000							
Site Source	New allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Devon Road.</p> <p>IIA1/2: If construction of this site and the Devon Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Devon Road site will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Devon Road site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Devon Road site.</p> <p>IIA14: If construction of this site and the Devon Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Devon Road site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Devon Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Devon Road is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-12 - Chrisp Street

Site Name		Chrisp Street						
Site Capacity		650						
Site Source		Existing allocation						
Site Status		Consented, Amendments under consideration						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 650 new homes, including the re-provision of 124 affordable residential units. The ward sits in the second most deprived decile, meaning the high proportion of affordable housing at this site has potential to bring positive effects due to the wards high levels of deprivation. The provision of 20,000sqm of communal amenity space under this development will be beneficial to residents. There are also plans to increase commercial floorspace, bringing about new retail and employment opportunities, and provide new public realm, landscaping works and child play spaces.
IIA2: Human Health	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, extension of existing multi-use spaces for community usage, the provision of new child play spaces and improvements to open space and public realm. The sites provision of new facilities and enhancement of existing spaces will improve physical and mental health and wellbeing and reduce levels of loneliness.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The site will encourage a mix of town centre uses including evening and night-time use and a market which will boost the overall vibrancy of Chrisp Street. Enhancements to the existing district centre and market will generate significant new employment and additional annual spend within the area, boosting the local economy.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The sites inclusion of employment space (Class B1) as well as retail will take the form of flexible commercial space, enabling a wide range of small to medium enterprises to set up here. This will generate a mix of commercial activity across the area that will in turn create a range of employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 650 new homes will help towards meeting LBTH's housing target. This will include the re-provision of 124 affordable units which will be beneficial to low income groups in the area. The development recognises that homes must be designed specifically to meet the needs of disabled people, but does not set a specific target of what percentage of new units will be wheelchair accessible and adaptable.
IIA6: Crime & Safety	+	M	D	R	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	H	D	R	I	P	LT	The site has good accessibility to sustainable transport, with access to numerous bus tops on Chrisp Street and East India Dock Road, as well as All Saint DLR Station located

Site Name	Chrisp Street							
Site Capacity	650							
Site Source	Existing allocation							
Site Status	Consented, Amendments under consideration							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								50m south east of the site and Langdon Park DLR Station located 160m north of the site. This will help to encourage the new population to seek sustainable transport alternatives. Improving accessibility to services will also help to reduce the need to travel.
IIA8: Accessibility	+	H	D	R	I	P	LT	The site already includes a range of facilities and the proposal includes further provision for community facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+	L	D	L	R	P	MT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide a significant increase in greenspace and GI, which could help to provide new small-scale habitats.
IIA10: Landscape & Townscape	+	M	D	R	I	P	LT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this Site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+	H	D	R	I	P	LT	The site sits within an Archaeological Priority Area. The developments intention to retain and enhance the existing heritage assets present at the site including the Festival of Britain housing and retail provision at ground floor level, the Clock Tower and the original 1950's Gibberd masterplan for the market will ensure the site does not damage the local heritage setting of the area
IIA12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.
IIA13: Water Quality	+	L	I	L	R	T	MT	Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
IIA14: Air Quality	-	H	D	R	I	P	LT	There will be temporary negative effects on air quality due to dust generation and emissions from construction. A number of existing residential receptors surround the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents. The site gives no detail as to how increases in operational air pollution will be managed.
IIA15: Climate Change & Resilience	+	M	D	R	I	P	LT	The site is located in an area which has a high overall climate risk and flood and heat risk rating and is likely to have diminishing resilience to climate change. Green walls, brown and green roofs, and street trees will improve urban greening and are expected to reduce the impacts of the UHI effect.

Site Name	Chrisp Street							
Site Capacity	650							
Site Source	Existing allocation							
Site Status	Consented, Amendments under consideration							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
IIA16: GHG Emissions	+/-	M	D	R	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Building efficiency measures are expected to reduce energy reliance. The scheme is also anticipated to make use of heating networks, including the use of combined heat and power and renewable energy, further details are yet to be confirmed.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites Aspen Way and Teviot Estate.</p> <p>IIA1/2: If construction of this site and the Aspen Way and Teviot Estate sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Aspen Way and Teviot Estate sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Aspen Way and Teviot Estate sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Aspen Way and Teviot Estate sites.</p> <p>IIA14: If construction of this site and the Aspen Way and Teviot Estate sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Aspen Way and Teviot Estate sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites Aspen Way and Teviot Estate is likely to result in a cumulative increase in waste.</p>							

Site Name	Chrisp Street							
Site Capacity	650							
Site Source	Existing allocation							
Site Status	Consented, Amendments under consideration							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-13 – Alisa Street

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site will provide 1450 new residential units, which will work positively towards achieving the borough's housing target. The site is located within the 10% most deprived LSOAs in the borough, meaning that development of this site could increase economic opportunities and reduce poverty. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.</p> <p>The site will also provide 6,500sqm commercial floorspace which will provide workspace, retail, and restaurant uses. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males and females.</p> <p>The site aims to deliver new retail facilities, workspaces and community facilities. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. This will help to improve the health and wellbeing for new residents and those living locally.</p>
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>The site is near Empson Street Strategic Industrial Location, one of London's main reservoirs of industrial and related capacity and is adjacent to Gillender Street Local Industrial Location. The site is not within a town centre, nor is it proposed for any town centre uses. The proposed land uses include the re-provision of existing employment, therefore retaining the current uses rather than revitalising the economy. Affordability of new units may be a key concern for existing business owners.</p>
IIA4: Employment & Skills	+	M	D	L	I	P	LT	<p>As well as housing, the site includes the re-provision of existing employment capacity on-site, including complementary commercial uses which support SME, creative industries and new retail. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 1450 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. The development recognises that homes must be designed specifically to meet the needs of disabled people which is reflected in the 10% wheelchair accessible and adaptable homes to be provided.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has relatively low PTAL scores ranging between 1b and 3, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13. The site will aim to facilitate a new or extended bus route through the site to enhance access to public transport, as well as improving access to public transport and walking and cycling routes across the River Lea.
IIA8: Accessibility	+	M	D	L	I	P	LT	There are plans to improve walking and cycling connections to, from and within the site, and support the provision of new and improved A12 and River Lea crossings, to encourage active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. Improvement in walking and cycling connections will improve accessibility, especially for the most deprived.
IIA9: Biodiversity & Natural Capital	+/-	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and The Limehouse Cut Conservation Area which is also designated a SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity along the water edges and within open spaces, which could help to provide new small-scale habitats.
IIA10: Landscape & Townscape	+	M	D	L	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The riverside frontage provides a key opportunity to provide high quality spaces that will become part of the public realm, and design principles highlight the need to improve riverside accessibility and the potential to improve access to the Lea River Park and Queen Elizabeth Olympic Park.

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, and adjacent to the Limehouse Cut Conservation Area. The site is close to a number of listed buildings, with the Former Bromley Hall School (Grade II) listed on the Heritage at Risk Register. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
IIA12: Flooding	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is directly adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. The site does however, include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, the development will be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
IIA13: Water Quality	+/-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts during construction. Once operational, the incorporation of rain and stormwater harvesting could lessen the environmental impact of urbanisation on stormwater drainage systems and the River Lea, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+	H	D	L	I	P	LT	Overall climate risk and overall heat risk is high. The landscape design will include a mixture of shrub and tree planting and biodiverse roofs which will contribute towards reducing the UHI, measures to limit overheating are also expected to be delivered which will increase the climate resilience of the development. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	+/ -	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The design of the scheme will incorporate energy efficiency measures and will ensure that construction is undertaken efficiently. A centralised combined heat and power system is expected to be delivered. Solar PV has been identified as a suitable renewable energy source for the site.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has an existing safeguarded waste site, which may be released for other uses due to being an area of regeneration. Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The site includes brownfield land and is also identified as containing vacant land. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Teviot Estate, Aberfeldy Estate and Leven Road. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Teviot Estate, Aberfeldy Estate and Leven Road site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Teviot Estate, Aberfeldy Estate and Leven Road site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Teviot Estate, Aberfeldy Estate and Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Teviot Estate, Aberfeldy Estate and Leven Road site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Teviot Estate, Aberfeldy Estate and Leven Road is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							

Site Name	Ailsa Street							
Site Capacity	1450							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA13: Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-14 – Leven Road

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site will provide 2800 new residential units, which will work positively towards achieving the borough's housing target. At least 35% will be affordable homes (70% affordable rent and 30% shared ownership). In addition, there will be new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site is located within the 10% most deprived LSOAs in the borough, meaning that development of this site could increase economic opportunities and reduce poverty. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities.</p> <p>The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males and females.</p> <p>The site will include additional community facilities including a secondary school, strategic consolidated open space which should include space for sport and recreation. Additionally, this site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. This will help to improve the health and wellbeing for new residents and those living locally.</p>
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	<p>The site allocation includes allowance for employment, through a variety of commercial units and 8,500sqm of commercial floorspace. The site is located near to Chrisp Street district centre and Poplar High Street neighbourhood centre, providing opportunities for residents to live locally and improve connectivity between the housing market and town centres. The proposed site will include the formation of new shopfront openings and public realm improvements at the ground and platform level. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.</p>
IIA4: Employment & Skills	+	M	D	L	I	P	LT	<p>As well as housing, the site includes the re-provision of existing employment capacity on-site. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 2800 new homes will help towards meeting LBTH's housing target. The site is proposed to meet the minimum 35% target of affordable homes. The development recognises that homes must be designed specifically to meet the needs of disabled people to this end, 10% of new units will be wheelchair accessible and adaptable.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community. The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.
IIA7: Sustainable Transport	-	M	D	L	I	P	LT	The site has low PTAL scores ranging between 1a and 2, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13.
IIA8: Accessibility	+	M	D	L	I	P	LT	There are plans to make cross river connection improvements, including the new 500m riverside walk, crucial to facilitate active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel. Improvement in walking and cycling connections will improve accessibility, especially for the most deprived.
IIA9: Biodiversity & Natural Capital	+/-	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and near The Limehouse Cut Conservation Area. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity along the water edges and within open spaces, which could help to provide new small-scale habitats. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	++	H	D	R	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The riverside frontage provides a key opportunity to provide high quality spaces that will become part of the public realm, and design principles highlight the need to improve riverside accessibility. The site includes strategic scale open space provision, supporting the borough's strategy to reduce open space deficiency.

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, and near to the Limehouse Cut Conservation Area. The site is a former gas works, therefore retaining and integrating the characteristic gasholders in the provision of open space has associated benefits. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
I/A12: Flooding	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is directly adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. The site does however, include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, the development will be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
I/A13: Water Quality	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts during construction. Once operational, the incorporation of rain and stormwater harvesting could lessen the environmental impact of urbanisation on stormwater drainage systems and the River Lea, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals
I/A14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
I/A15: Climate Change & Resilience	+	H	D	L	I	P	LT	Overall climate risk and overall heat risk is high. The delivery of the site is expected to be landscape-led and will provide a green infrastructure grid and large green spaces which will improve the UHI effect. Measures to reduce the risk of overheating have been incorporated into the design of residential homes. SUDs measures will include living roof and rainwater harvesting. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, opportunities for greywater re-use and rainwater harvesting are likely to be investigated which will help with water quantity issues during periods of drought.
I/A16: GHG Emissions	+/-	M	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. A site wide heat network is expected to be delivered. Measures to improve energy efficiency will reduce energy demand.,

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The site is derelict brownfield land. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Ailsa Street, Aberfeldy Estate and Blackwall Trading Estate and Leamouth Road Depot is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p>							

Site Name	Leven Road							
Site Capacity	2800							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10/IIA11: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Aberfeldy Estate

Table G-15 – Aberfeldy Estate

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The has potential to provide at least 1550 new homes, of which at least 35% will be affordable. In addition, there will be new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The needs of all groups are taken into account, with provision of a mosque nearby providing a vital cultural facility. The site has potential to provide additional community spaces, including a primary school, as well as the potential for extra-care accommodation or accommodation for people with learning disabilities. This will improve the provision of services for the community.
IIA2: Human Health	++	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. . However, the development of new primary school provision, including playing fields and sports facilities is likely to improve the health and wellbeing of children around the site and Leaside area, providing play and educational facilities. Additionally, the site has potential to provide extra-care accommodation or accommodation for people with learning disabilities.
IIA3: Economy & Town Centres	++	H	D	L	I	P	LT	The site is well located, within Aberfeldy neighbourhood centre, near to Chrisp Street district centre and Poplar High Street neighbourhood centre, <1 km from Canary Wharf Major Centre, and the Isle of Dogs Activity Area. Aberfeldy neighbourhood centre provides a range of shops and services to meet the needs of its local catchment, with a higher proportion of convenience retail compared to comparison retail. The development aims to create a new local centre on Aberfeldy Street, with shops, workspaces, a community centre and mosque. New commercial space will include the provision of affordable workspace for local businesses.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The proposed site is partially located in a town centre (Aberfeldy neighbourhood centre) and is adjacent to a primary shopping area (Chrisp Street primary shopping area), providing opportunities for residents to live locally and improve connectivity between the housing market and town centres. The development aims to provide shops and new commercial space, including affordable workspace for local independent businesses. This will likely increase employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	M	D	L	I	P	LT	The provision of 1550 new homes will help towards meeting LBTH's housing target. The site is proposed to meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-30% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	-	M	D	L	I	P	LT	The site has relatively low PTAL scores ranging between 1b and 3, and is therefore isolated in terms of sustainable transport, largely due to its surrounding connectivity barriers in the form of the River Lea, the A12 and the A13. The site will, however, provide improved walking and cycling connections to, from and within the site.
IIA8: Accessibility	+	M	D	L	I	P	LT	There are plans to improve walking and cycling connections to, from and within the site, and support repurposing the existing A12 underpass to create a new walking and cycling route to improve connectivity across Poplar. Creation of healthy streets will also encourage active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	++	L	D	L	R	P	MT	The site is adjacent to The River Thames and Tidal Tributaries SINC and near The Limehouse Cut Conservation Area. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site will contribute to biodiversity through creation of new public realm and upgrades to existing open spaces, which could help to provide new small-scale habitats. The site is expected to deliver an integrated approach to open space, biodiversity and the natural environment through the provision of GI.
IIA10: Landscape & Townscape	++	H	D	R	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. The site includes strategic open space provision and has plans for new high-quality planting and landscaping, supporting the borough's strategy to reduce open space deficiency.
IIA11: Historic Environment	+/-	M	D	L	R/I	P/T	ST/LT	The site is located within the Lea Valley and Limmo APA, and near to a number of conservation areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment. Open space within the site will be maintained, and a larger provision of open and amenity spaces will also be provided, integrating new green development into the existing surrounding context. The site will have an overall positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area.

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA12: Flooding	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a flood warning area, and is adjacent to the River Lea. The site is low lying and therefore has a greater probability of flooding. No details are currently understood relating to flood risk measures for the site.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts.
IIA14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk is high and overall heat risk is medium. Development specific climate resilience measures are not known at this stage, however, the incorporation of GI will help to alleviate the UHI effect.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Teviot Estate, Ailsa Street and Leven Road. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Teviot Estate, Ailsa Street and Leven Road site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Teviot Estate, Ailsa Street and Leven Road site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p>							

Site Name	Aberfeldy Estate							
Site Capacity	1550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Teviot Estate, Ailsa Street and Leven Road site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Teviot Estate, Ailsa Street and Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Teviot Estate, Ailsa Street and Leven Road site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Teviot Estate, Ailsa Street and Leven Road site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Teviot Estate, Ailsa Street and Leven Road is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-16 – Bromley by Bow

Site Name	Bromley by Bow							
Site Capacity	1300							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site has potential to provide approximately 1,300 homes, of which 35% will be affordable. This will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable.</p> <p>The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including educational provision and community facilities.</p>
IIA2: Human Health	++	H	D	L	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is in the top 30-50% nationally. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The provision of open spaces including a 1.2ha park is expected to deliver further health benefits for the population.</p> <p>Additionally, the site development states that residents of the proposed site would not be exposed to excessive noise or other pollution from Bow Free Wharf. This would minimise stress caused by excess noise and improve human health.</p>
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	<p>There are no town centres within 1km of the site, but Stroudley Walk primary shopping area is located 300m from the site. The site is anticipated to contain employment-generating business space, likely to improve the economy of the area.</p>
IIA4: Employment & Skills	+	M	D	L	I	P	LT	<p>The site is in the 10-20% least deprived nationally in terms of employment. The sites anticipated to contain employment-generating business space, and community and educational facilities to provide employment and upskilling opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>
IIA5: Housing	+	H	D	R	I	P	LT	<p>The provision of 1,300 new homes will help towards meeting LBTH's housing target. It is assumed that the site will provide 35% affordable housing, meeting the minimum target. Further details will be required regarding the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.</p>
IIA6: Crime & Safety	+	M	D/I	L	I	P	LT	<p>The site is located in the 30-50% most deprived nationally in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to</p>

Site Name	Bromley by Bow							
Site Capacity	1300							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								<p>improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community. Additionally, the site includes improvements to safety within the underpass beneath the A12, as well as improvements to at-grade pedestrian and cycle crossings. This will contribute to improving pedestrian safety at junctions, as well as the feeling of safety.</p> <p>The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.</p>
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station, the underground and the cycle network. This is reflected in the site having a PTAL level of between 3 and 6a. The site is well located to local facilities and services which will allow residents to live their lives more locally.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D/I	L	R/I	P/T	ST/MT	There is an area of priority habitat for mudflats located 30m east of the site. There is a potential negative effect on this habitat as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, however it is unknown whether the site will be in line with BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	+/-	M	D/I	L	R/I	P/T	ST/MT	The site is located 40m from an area of Local Open Green Space (St Leonard's Churchyard). It is therefore expected that the development of the site will respond to the existing character of the surrounding built environment, taking into particular consideration the massing of the surrounding area. There are likely to be temporary negative effects to the local landscape and townscape setting during construction, however, the site will incorporate GI as part of the design including the increase in public realm and public open spaces.
IIA11: Historic Environment	-	L	D/I	L	R/I	P/T	ST/MT	The site has a number of heritage assets within its vicinity, is adjacent to Three Mills Conservation Area and is located within Lea Valley Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.

Site Name	Bromley by Bow							
Site Capacity	1300							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	D/I	R	R/I	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The incorporation of GI will help to alleviate the UHI effect.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North.</p> <p>IIA1/2: If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Whitechapel North site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Whitechapel North site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring site Whitechapel North.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archelogy from both this site and the Whitechapel North site.</p> <p>IIA14: If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Whitechapel North site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Whitechapel North site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel North is likely to result in a cumulative increase in waste.</p>							

Site Name	Bromley by Bow							
Site Capacity	1300							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further Assessment as part of the scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that current supply is sufficient in supporting new communities.</p> <p>IIA6: The development should be designed in accordance with the Secured by Design Principles and Policies PS3 and PS4.</p> <p>IIA9: Other policies in the Local Plan should help to avoid potential negative effects, e.g. Policies BO1, BO2, BO3, BO and BO5. The site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between public realm and open spaces.</p> <p>IIA12: Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: The application of policy CG9 will help ensure that measures to improve air quality should be implemented on site during construction and operation</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Blackwall Trading Estate and Leamouth Road Depot

Table G-17 – Blackwall Trading Estate and Leamouth Road Depot

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	R	I	P	LT	The site has potential to provide approximately 775 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
IIA2: Human Health	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is in the top 30-50% nationally. Life expectancy for males and female are also lower than the national average. The site includes the development of a primary health care facility or community facility as required at the site. This will aid in ensuring that there is adequate healthcare and community infrastructure for the increasing population in and around the site.
IIA3: Economy & Town Centres	+	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the top 10-20% most deprived nationally in terms of income. The site is located near London City Island town centre. At this stage it is not known if the site will include any additional retail or business spaces.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the top 10-20% most deprived nationally in terms of employment. The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 775 new homes will help towards meeting LBTH's housing target. It is assumed that the site will provide 35% affordable housing, meeting the minimum target. Further details will be required regarding the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community. The implementation of riparian lifesaving infrastructure along the riverside path within the site will also contribute to improving user safety, helping to prevent death by drowning in the river.

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	L	D	L	I	P	LT	The site has average to good connectivity via public transport through bus and Overground rail, but the site is located 1.75km from the closest tube station. This is reflected in the PTAL score of between 2 and 5. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	H	D/I	R	R/I	P/T	ST/LT	Construction has potential to have temporary adverse effects on the adjacent Bow Creek Ecology Park SINC (across the River Lea in the London Borough of Newham) as well as the mudflat priority habitat, which falls within the site boundary. Habitats are likely to be affected by increase in noise and vibration, temporary reductions in air quality as well as potential land take and/or habitat fragmentation. However, the development aims to incorporate a 'significant amount' of riverside public open space, with elements of biodiversity that complement the adjacent Bow Creek Ecology Park SINC.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located near designated local open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting, particularly through the incorporation of riverside public open space.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Lea Valley archaeological priority area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	--	M	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Lea. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The incorporation of GI will help to alleviate the UHI effect.

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the Leven Road site.</p> <p>IIA1/2: If construction of this site and the Leven Road site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Leven Road site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Leven Road site will significantly increase housing stock.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Leven Road site.</p> <p>IIA14: If construction of this site and the Leven Road site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Leven Road site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Leven Road site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring Leven Road site is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features or local heritage assets.</p> <p>IIA8: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12: Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p>IIA13: Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to</p>							

Site Name	Blackwall Trading Estate and Leamouth Road Depot							
Site Capacity	775							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Hackney Wick Station

Table G-18 - Hackney Wick Station

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	<p>The site will provide a minimum of 800 residential properties (300 within Tower Hamlets). The area is located within the 30-50% most deprived neighbourhoods, and it is expected that the site will deliver 35% affordable housing. This site may also be suitable for extra-care accommodation. A range of sizes of housing unit will meet housing requirements for all. It is expected that at least 10% of each tenure type will be designed to be wheelchair user dwellings and located where there is suitable access for parking.</p> <p>The site will be served by a nursery, library and associated community uses which will help to improve local access to services and bring communities together and supporting the changes demographics of the area.</p>
IIA2: Human Health	++	H	D	R	I	P	LT	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and some community facilities, however, health deprivation is high and life expectancy is worse than the national average for males. As well as housing, the site will include new employment opportunities, and will include new open spaces. The site will therefore reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness, ensuring that the needs of all groups will be met now and in the future.</p>
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	<p>The site will include the provision of active frontages and public realm improvements at ground floor level and prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The site is located within the Hackney Wick neighbourhood centre and so the addition of new retail spaces will improve the vitality of the high street. The site will also replace the existing employment, cultural, creative, retail and residential uses (including a theatre) with the aim to ensure no net loss in employment opportunities. It is expected that a variety of workspace typologies will be provided to meet the local demand.</p>
IIA4: Employment & Skills	++	H	D	R	I	P	LT	<p>The site will include employment space (Class B1, B2 uses) as well as retail. This will likely increase employment opportunities and improve town centre viability. All employment floorspace at the existing site will be replaced to ensure there is no net loss in jobs. A variety of workspace typologies will be provided, as well as a mixture of cultural uses to support existing and emerging demands for business spaces. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of over 800 new homes (300 in Tower Hamlets) will help towards meeting LBTH's housing target. At least 35% of all units will be affordable and will include 10% wheelchair adaptable homes. The size, type and tenure of housing takes into account different groups in the community including, but not limited to, those who require affordable housing, families with children, older people and people with disabilities. This site may also be suitable for extra-care accommodation.
IIA6: Crime & Safety	+	M	D	L	I	P	LT	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). It is assumed that the proposal will be designed in accordance with the Secured by Design Principles. The site will include a range of uses and improving public realm including active uses at ground floor level, which will improve overall natural surveillance. Overall, it is considered that the development of the site will improve perception of safety. Improvements to internal connectivity will increase passive surveillance through and around the site, which will improve the security of the area.
IIA7: Sustainable Transport	++	L	D	L	I	P	LT	The site is in close proximity to underground and overground stations, as well as a number of bus stops. The site connected to the London Cycle Network and the National Cycle Network. This is reflected in a PTAL score between 2-4. Cycle parking is expected to be delivered as part of the site's development. The site is also proposed to deliver a pattern of land use which prioritises walking and cycling and facilitates short trips.
IIA8: Accessibility	++	H	D	R	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The level of additional services provided on-site will deliver a pattern of land use which prioritises walking and cycling, and reduces the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R/I	P/T	ST/LT	There are no statutory or non-statutory designated sites within the site, an area of prior habitat deciduous woodland is located to the south west of the site. The site is also located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. However, the site will provide an increase in GI (particularly from the redevelopment of Queen's Yard), which could help to provide new small-scale habitats. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	+	M	D	L	R/I	P/T	ST/LT	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. Improvements to public realm and consideration of the design within will improve townscape and landscape setting.

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+	M	D	L	R/I	P/T	ST/LT	The site lies within the Hackney Wick and Fish Island Conservation Areas and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. It is expected that the site will reduce the number of vacant sites and buildings which currently have a negative impact on the designated heritage assets. The site will demonstrate buildings of industrial character, in-keeping with the existing site.
IIA12: Flooding	--	H	D	L	I	P	LT	The site lies within Flood Zones 2 and 3. It is expected that the site will achieve safety through the sequential allocation of development types and appropriate flood resilience measures. At this stage, flood risk and sustainable drainage measures have not been fully realised.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is adjacent to a main river, and so consideration to adequately mitigate against adverse impacts on water quality as a result of the development is key to the delivery of the site.
IIA14: Air Quality	+/-	M	D/I	L	R/I	P/T	ST/LT	Air quality at the site is good with low levels of NO ₂ and PM ₁₀ . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are high. Development specific climate resilience measures are not known at this stage. The addition of GI will help to alleviate the UHI effect, but more specific climate resilient design measures are not known at this time.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	++	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing and mixed-use development which will help to make the best use of the site.

Site Name	Hackney Wick Station							
Site Capacity	800 on the whole allocation (300 within borough)							
Site Source	New allocation - LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater</p> <p>IIA1/2: If construction of this site and the other allocated sites at Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites.</p> <p>IIA14: If construction of this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Hepscoot Road, Neptune Wharf, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15/16: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Hepscott Road

Table G-19 – Hepscott Road

Site Name		Hepscott Road						
Site Capacity		525						
Site Source		New allocation – LLDC Local Plan allocation						
Site Status		New allocation						
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	++	M	D	R	I	P	LT	The site is anticipated to provide up to 525 new homes, of which 35% will be affordable, this is key for the area as it falls within the 30-50% most deprived. The site has fair access to some community services which will help to bring communities together and support a changing demographic. The site will also include additional community and cultural facilities and may be potentially suitable for extra-care accommodation.
I/A2: Human Health	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health. Health deprivation is currently high, and the life expectancy for men is worse than the national average. The site will comprise of mixed-use development opportunities, supports urban greening through the provision of canal-side open space, and encourages improvements to the public realm. Community uses will also be included within the development site to meet the needs of the additional population. Overall, the site is expected to reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. The site will promote active travel through the provision of new walking and cycling routes by and providing connection to the Hertford Union Canal towpath, Roach Point Bridge, and Hackney Wick Station. It will ensure that the needs of all groups will be met both now and in the future.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site will include active uses through the formation of active frontage and non-residential ground floor frontage, prioritising mixed use development with residential properties above ground floor level, improving connectivity between business clusters. New shopfront openings and public realm improvements at the ground floor level. The site will prioritise mixed use development, with residential properties above the ground floor level to improve and enhance connectivity between business clusters. The Site is located within close proximity to the Hackney Wick Neighbourhood Centre. The site will serve a range of business needs providing employment, creative and cultural uses.
I/A4: Employment & Skills	++	H	D	R	I	P	LT	The site will include employment space, supporting further job opportunities in the area. The site is expected to provide a range of employment, creative and cultural uses, meeting the needs for businesses and diversifying the labour market. The Site is outside the Activity Area, and so will improve employment opportunities within the locality. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	++	H	D	L	I	P	LT	The provision of approximately 525 new homes will help towards meeting LBTH and LLDC's housing target. At least 35% of all units will be affordable. It is expected that the size, type and tenure of housing takes into account different groups in the community, including but not limited to, those who require affordable housing, families with children, older people and people with disabilities.

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	M	D	L	R/I	P/T	LT	The site is located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The Site will include a range of uses and will improve public realm including active uses at ground floor level, which will improve overall natural surveillance, particularly considering the existing waste management use of the site. It is expected that the development of the site would improve the perception of safety within the area compared to the existing nature of the site as a waste management facility. Improvements to connections for public foot and cycle traffic through the site are also expected to improve the security of the area
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is in a fairly sustainable location, located in close proximity to Hackney Wick Railway Station, a number of bus stops. The site is not connected to the London Cycle Network, and is not in close proximity to EV charging infrastructure. This is reflected in a PTAL score between 2-3. The site includes the development of new walking and cycle routes providing connections to the Hertford Union Canal towpath, Roach Point Bridge and Hackney Wick Station.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel, the additional services to be provided on site is expected to sufficiently serve the new population of the area.
IIA9: Biodiversity & Natural Capital	++	M	D	L	I	P	LT	Areas of deciduous woodland are located <0.8km from the Site. The site is also located in close proximity to a number of SINCs. There are no other statutory or non-statutory designated sites of nature conservation interest within or adjacent to the development site. A canal is located to the South of the Site. The development site mainly comprises of previously developed brownfield land, with most areas limited in vegetative cover. It is expected that there will be a minor adverse impact on ecology during construction. The site will include a linear park alongside the canal which will improve GI corridors and enhance the biodiversity of the site, which outweighs harm during the construction phase.
IIA10: Landscape & Townscape	+/-	M	D/I	L	I	P	LT	The site is located adjacent to MOL to the South and designated Open Space to the West. The site is expected to respond positively to the waterfront setting, enhancing the character of the canal and enhance strategic views west towards central London, and aims to achieve high quality public realm improvements.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Fish Island Conservation Area and the Lea Valley Archaeological Priority Areas. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. It is anticipated that the development will make use of to ensure the retention and reuse of buildings of heritage value, and how development should preserve and enhance the conservation area, and where outside, enhance its setting.

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A12: Flooding	-	H	D	L	I	P	LT	The site is located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
I/A13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to Hertford Union Canal. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff.
I/A14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements will also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption to the local residents.
I/A15: Climate Change & Resilience	+	M	D/I	L	I	P	LT	Overall climate risk and overall heat risk are both high. Climate resilience measures are expected to reduce impacts of overheating risk and GI is a key element of the scheme to be delivered which should reduce the impacts of the UHI Effect. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
I/A16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
I/A17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
I/A18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater</p> <p>IIA1/2: If construction of this site and the other allocated sites at Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites.</p> <p>IIA14: If construction of this site and the Neptune Wharf Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Neptune Wharf, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 10% accessible homes. A range of housing options to suit all housing needs within the community is necessary in line with policies HF1 and HF2.</p> <p>IIA1/2: Further assessment of part of scheme level design should incorporate an evaluation of the provision of healthcare to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3: Where the site is located adjacent to a designated town centre, policies TC1-TC8 will ensure that development outside of the town centre will not detrimentally impact on the existing town centre, allowing centres to remain vibrant and sustainable and demonstrating vitality.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Sustainable Transport should be delivered as part of the development, in line with the requirements of policies MC1 and MC2.</p> <p>IIA9: In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12: Development should be delivered in line with Policy CG6, the NPPF and guidance from the Environment Agency.</p> <p>IIA13: Development should be delivered in line with Policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon</p>							

Site Name	Hepscott Road							
Site Capacity	525							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-20 – Sweetwater

Site Name	Sweetwater							
Site Capacity	775							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide up to 775 residential properties. The area is located within the 30-50% most deprived neighbourhoods, and 30% of the housing proposed will be affordable. A range of sizes of unit are proposed to meet housing requirements for all. At least 10% of each tenure type are designed to be wheelchair user dwellings and located where there is suitable access for parking. Access to services and facilities is generally good, and the site will be served by a nursery, library and associated community uses which will help to bring communities together and supporting the changes demographics of the area. The site will also be supported by public realm.
IIA2: Human Health	++	H	D	R	I	P	LT	The site is located in close proximity to a range of facilities and infrastructure which supports human health, including significant areas of parks and open spaces. Health deprivation is currently high, and the life expectancy for men is worse than the national average. The site will comprise of mixed-use development opportunities and supports urban greening through the provision of a canal-side walk, which will improve public realm and provide safe spaces for walking and cycling, and the provision of play spaces. A new NHS healthcare facility will also be provided. Other community facilities include a library and community centre and a nursery and outdoor play spaces. Overall, the site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The site lies in an out-of-centre location, with Hackney Wick Neighbourhood Centre being the closest to the site. The site will deliver non-residential floorspace so that the needs of residents are responded to and provide a mixture of uses to establish its own neighbourhood centre which will complement the wider Hackney Wick Area, and introduce its own neighbourhood parade into the locality. The site will include active uses through the formation of active frontage and non-residential ground floor frontage, prioritising mixed use development with residential properties above ground floor level, improving connectivity between business clusters.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	The site is within the 10-20% most deprived in terms of income, and the 30-50% most deprived in terms of employment. The site will include employment and commercial floor space, supporting further job opportunities in the area. The Site is outside the Activity Area and other industrial locations and so will improve and generate local employment opportunities. Ground floor uses will create its own neighbourhood centre, in an area where there are currently no neighbourhood parades within close vicinity to the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Sweetwater							
Site Capacity	775							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	H	D	R	I	P	LT	The provision of 775 new homes will help towards meeting LBTH and LLDCs housing targets. The site is within the 10-20% most deprived in relation to barriers to housing. At least 30% of all units will be affordable. 10% of residential units will be accessible homes. The site will include housing units in a range of sizes to suit all members of the community.
IIA6: Crime & Safety	+	M	D/I	L	R/I	P/T	ST/LT	The site is located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). The site will include a range of uses and will improve public realm including active uses at ground floor level, which will improve overall natural surveillance. It is assumed the site has been designed in mind with measures to design out crime, and so the development will inherently improve the perception of safety within the area. Improvements to connections for public foot and cycle traffic through the site are also expected to improve the security of the area.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site is in a fairly sustainable location, and is located in close proximity to Hackney Wick Railway Station, Pudding Mill Lane and Stratford International DLR stations, as well as a number of bus stops. The site connected to the London Cycle Network. There is little EV charging infrastructure at the site. This is reflected in a PTAL score between 2-3. The site will include 20% EV charging when operational. Also, walking and cycling routes are proposed, as well as secure cycle parking. The site is also proposed to deliver a pattern of land use which prioritises walking and cycling and facilitates short trips.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. The level of additional services provided on-site will deliver a pattern of land use which prioritises walking and cycling and reduces the need to travel. Accessible parking bays will be provided for wheelchair accessible dwellings for 3% of accessible dwellings for up to an additional 7%.
IIA9: Biodiversity & Natural Capital	+/-	H	D	R	I	P	LT	There are no statutory or non-statutory designated sites within the site, an area of prior habitat deciduous woodland is located to the south of the site. The site is also located in close proximity to a number of SINCS. The site is expected to deliver an integrated approach to open space, biodiversity and the natural environment through the provision of GI. It is expected that during construction there will be an adverse impact on ecology. It is assumed that BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) will be delivered through the development of the Canal Park, the proposed liveable streets, and green roofs.
IIA10: Landscape & Townscape	++	M	D	L	R/I	P/T	ST/LT	Local Open Space within the site will be maintained, and a larger provision of open and amenity spaces will also be provided through the approved landscaping plan, integrating new green development into the existing surrounding context. The site will have an overall positive contribution to the townscape, with open space provision to deliver enhancements to the character and appearance of the surrounding area. Active frontage would be created along the canal, and green landscapes areas will be maintained to set development back from the river frontage to maintain the character of the canal side.

Site Name	Sweetwater							
Site Capacity	775							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+	M	I	L	R/I	P/T	ST/LT	The site lies within close proximity to the Fish Island, Hackney Wick, and White Post Lane Conservation Areas and is situated within the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets, which must be mitigated against. The site will lead to the enhancement of existing views and greening which will have a positive impact on heritage assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a main river, and so consideration to adequately mitigate against adverse impacts on water quality as a result of the development is key to the delivery of the site.
IIA14: Air Quality	+/-	M	D	L	I	T	ST	Air quality is generally good at the site. The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions. Residential properties will be set back and separated from main vehicle circulation routes by street trees to reduce impact on the local community.
IIA15: Climate Change & Resilience	+	H	D	L	I	P	LT	The site is identified as being at high heat and climate risk. The addition of more GI and open space will help to reduce the UHI effect. It is expected that homes and non-residential units will be constructed to energy efficient standards and will make use of renewable energy. It is assumed sustainable construction practices will be used. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is uncertain if the development will include renewable energy sources.
IIA17: Waste	+	M	D	L	I	P/T	ST	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site The site will encourage sustainable use of materials through the use of recycled aggregated and materials
IIA18: Efficient use of Land	++	M	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. The site will encourage sustainable use of materials through the use of recycled aggregated and materials

Site Name	Sweetwater							
Site Capacity	775							
Site Source	New allocation – LLDC Local Plan allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites at Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf, as well as other East Wick and Sweetwater development phases outside of the borough.</p> <p>IIA1/2: If construction of this site and the other allocated sites at Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune and Wharf and other phases of the East Wick and Sweetwater development were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and other East Wick and Sweetwater phases, and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites, as well as other East Wick and Sweetwater development phases outside of the borough, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increases in the loss of heritage assets and buried archeology from both this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites as well as other East Wick and Sweetwater development phases outside of the borough.</p> <p>IIA14: If construction of this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf and other East Wick and Sweetwater phases of development were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate and Neptune Wharf sites as well as other East Wick and Sweetwater development phases outside of the borough is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Hepscoth Road, Hackney Wick Station, Hamlet Industrial Estate, Neptune Wharf sites and other East Wick and Sweetwater phases are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA13: The application of policy CG6, CG7 and CG8 will help to preserve water quality and mitigate impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15/16: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-21 – Teviot Estate

Site Name	Teviot Estate							
Site Capacity	1200							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 1,200 new residential units, which will work positively towards achieving the borough's housing target. Population density is higher than the borough average within this ward, therefore provision of additional residential units could reduce overcrowding. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site aims to provide additional facilities, including community and faith facilities, as well as a new primary school. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
IIA2: Human Health	++	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. As well as housing, the site includes community and faith facilities, and supports urban greening through provision improvements to parks and open spaces at Langdon Park and Uamvar Street, as well as encouraging improvements to the public realm. The site could potentially be suitable for extra-care accommodation or accommodation for people with learning disabilities. The site will reduce levels of health inequalities and provide new facilities which will improve wellbeing and reduce levels of loneliness. The development of new primary school provision, including playing fields and sports facilities is likely to improve the health and wellbeing of children around the site and Leaside area, providing play and educational facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is near Empson Street SIL, one of London's main reservoirs of industrial and related capacity, and is adjacent to Barratt Industrial Estate, a Locally Significant Industrial Site. The site will aim to cluster of local retail and community uses could be reprovided along Zetland Street from the current location on Teviot Street, which may provide some additional employment opportunities, however, these are unlikely to be significant. .employment opportunities and town centres.
IIA4: Employment & Skills	+	L	D	R	I	P	LT	The site is well located close to Empson Street SIL, <1 km from Canary Wharf Major Centre, and the Isle of Dogs Activity Area, providing opportunities for access to employment. However, it is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 1200 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of high crime deprivation (top 10-40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and

Site Name	Teviot Estate							
Site Capacity	1200							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7:Sustainable Transport	?	N/A	N/A	N/A	N/A	N/A	N/A	Some access is available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 2 and 4. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision, however improved infrastructure is a proposed feature of the scheme.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on site and the current capacity of these facilities. There is potential for essential services to be stretched by a population increases. This may conversely increase the need to travel. Details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is adjacent to the River Thames and Tidal Tributaries SINC and adjacent to areas of priority habitat including mudflat. There is potential for some adverse effects on some small scale habitats and species during construction, as a result of noise and dust spoiling. Some new green spaces and play parks will be provided, but this will be small scale and at this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	+	M	D	L	I	P	LT	There are a number of open spaces in the vicinity of the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape. There are proposals to create new green and play spaces which will deliver enhancements to the character and appearance of the surrounding area.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located within the Lea Valley APA, partially within the Langdon Park Conservation Area, and adjacent to the Limehouse Cut Conservation Area. It is therefore anticipated that the built form will protect and enhance the setting of heritage assets. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets
IIA12: Flooding	--	H	D	L	I	P	LT	The site is partially located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. The site gives no detail as to how it intends to manage the flood risk of the area, however any measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the Limehouse Cut. There is potential for increased surface runoff during construction, further polluting this watercourse. No details are currently known relating to any measures to mitigate against water quality impacts.

Site Name	Teviot Estate							
Site Capacity	1200							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are high. Development specific climate resilience measures are not known at this stage. The addition of GI will help to alleviate the UHI effect, but more specific climate resilient design measures are not known at this time.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Ailsa Street, Aberfeldy Estate and Chrisp Street. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archology from both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Ailsa Street, Aberfeldy Estate and Chrisp Street site is likely to result in a significant cumulative increase in embodied</p>							

Site Name	Teviot Estate							
Site Capacity	1200							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed. IIA17: Demolition, excavation, and construction of this site and neighbouring site Ailsa Street, Aberfeldy Estate and Chrisp Street is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.							
Mitigation and Enhancement Measures	IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies. IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities. IIA6: Development should incorporate designing out crime principles identified in Policy PS4. IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment. IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics. IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential. IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12. IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency. IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation. IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development. IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored. IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP. IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.							

Table G-22 – Aspen Way

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	M	D	R	I	P	LT	The site will provide 780 new residential units, which will work positively towards achieving the borough's housing target. However, it is not known whether there will be provision made for wheelchair adaptable homes. It is assumed that the site will meet the minimum 35% target of affordable homes. The site is within the 20-30% most deprived Lower Super Output Areas (LSOAs) in the borough so affordability should be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will also include additional community facilities, including sports, cultural and a college. Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD, which aims to address the social, economic and environmental disparities between Poplar and Canary Wharf.
IIA2: Human Health	+	M	D		I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and is directly adjacent to Poplar Recreation Ground, however, health deprivation is high and life expectancy is worse than the national average for males and females. It is not clear whether the current healthcare provision will meet the needs of the new population. However, the additional provision of community facilities, college and football pitches will contribute to improving the public realm and community facilities around the site. Additionally, reprovisioning the football pitches will encourage physical activity and improve health, particularly amongst children and young people.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The finer details of the development are not yet known; however the site is allocated for mixed use development and compatible commercial uses, which will include SME and retention of the existing Docklands Light Railway (DLR) depot. The site will improve and enhance connectivity between business clusters and the housing market.
IIA4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to existing employment areas, within the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. The proposal of mixed-use development to include commercial uses will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 780 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions. The addition of sustainable transport provision could reduce the number of vehicles on the borough's roads, thus supporting road safety measures to reduce the numbers of victims killed and seriously injured (KSI) on roads.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail, with Poplar DLR station within the site. It is uncertain if there are plans for additional transport provision. This is reflected by the site having a PTAL scores ranging between 3 and 5. However, the site includes improved walking and cycling connections to the surrounding area, including: Poplar DLR station, Poplar High Street, East India Dock Road and Canary Wharf Station. There are also proposed improvements to the pedestrian crossing over Aspen Way as part of the development.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. Active travel is encouraged with direct access to the National Cycle Network. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	+	L	D	L	R	P	MT	The site is located away from any greenspace or designated sites, however, there is potential for some adverse effects on some small-scale habitats and species during construction. The provision of strategic open space along with a public square green grid improvements, will help to increase biodiversity and natural capital on site.
IIA10: Landscape & Townscape	++	H	D	R	R/I	P/T	ST/LT	The current landscape/ townscape is of a low quality. The proposed site aims to create a positive sense of place with a public square and public green open space that integrates north-south links and Poplar DLR station, and improve the quality of spaces around and between buildings and movement through the area.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is partially located within both Poplar and Isle of Dogs APA, and partially within St Matthias' Church Conservation Area. It is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II New City College within the site, as well as multiple adjacent listed buildings. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	-	H	D	L	I	P	LT	The site falls wholly within Flood Zone 3 and a Flood Risk Area. The site is low lying and therefore has a greater probability of flooding. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								water and enable discharge into the docks to the south. However, no details are understood relating to the specific measures this will include, or any additional flood risk mitigation.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has substandard air quality but provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk is medium and overall heat risk is high. Development specific climate resilience measures are not known at this stage, but the incorporation of green spaces and GI will help to reduce the UHI effect. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site North Quay and Billingsgate Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the North Quay and Billingsgate Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the North Quay and Billingsgate Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p>							

Site Name	Aspen Way							
Site Capacity	780							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the North Quay and Billingsgate Market site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the North Quay and Billingsgate Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the North Quay and Billingsgate Market site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the North Quay and Billingsgate Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site North Quay and Billingsgate Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife). Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Billingsgate Market

Table G-23 – Billingsgate Market

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	L	I	P	LT	<p>The site has potential to provide approximately 3000 homes, which will work positively towards achieving the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known. It is also not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.</p> <p>Proposals on this site should be in accordance with the principles of the South Poplar Masterplan SPD, which aims to address the social, economic and environmental disparities between Poplar and Canary Wharf.</p>
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	<p>As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, including sports facilities. It is not clear whether the current provision will meet the needs of the new population. There is limited information on the level of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, it is expected the scheme will deliver open space, a community centre and retail complexes which will help to promote active and healthy lifestyles.</p>
IIA3: Economy & Town Centres	+/-	M	D	L	I	P	LT	<p>The site will prioritise mixed use development, and there is an allowance for employment on-site, including strategic office space with supporting uses such as gyms, hotels, restaurants and retail, along with compatible commercial uses, including SME, as well as industrial floorspace. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is adjacent to Canary Wharf Major Centre, and so it is imperative that development does not impact on the function of this retail centre. As part of the development, relocation of the wholesale market is required, the UK's largest inland fish market. Therefore, re-provision must be suitable to ensure it continues its legacy.</p>
IIA4: Employment & Skills	+	M	D	L	I	P	LT	<p>The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.</p>

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 3000 new homes will help towards meeting the borough's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, overground, underground and rail, with multiple Docklands Light Railway (DLR) stations nearby. The site has a PTAL score of between 4 and 5. Active travel is also encouraged via the London Cycle Network. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to transport, facilities and services. The development has aspiration for pedestrian and cycling priority access along a new dockside promenade, further facilitating active travel. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	-	M	D	L	R	T	ST	The site is located adjacent to areas of mudflat priority habitat, along with a few SINCS, including Millwall and West India Docks SINC, Blackwall Basin SINC, and Poplar Dock SINC. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown
IIA10: Landscape & Townscape	+/-	M	D/I	L	I	P	LT	The site is located in close proximity to Local Open Space and is within the Tall Building Zone and the Canary Wharf Strategically Important Skyline. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Heights and layout will ensure that One Canada Square retains its prominence, and ensure that the silhouette of One Canada Square, and particularly its distinctive pyramid, remain visible in views from north. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	H	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II accumulator tower on the west side of Poplar Dock, within the site. Design principles will need to protect or enhance the accumulator tower. Coldharbour Conservation Area and the safeguarded Northumberland Wharf are located near to the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	-	H	D	L	I	P	LT	The site is predominantly located within Flood Zone 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface water and enable discharge into the docks to the south.
IIA13: Water Quality	-	H	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. The management of surface water and the enablement of discharge into the docks to the south of the site, may also impact on water quality. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	M	D	L	I	P	LT	Overall climate and heat risk is medium-high. Climate resilience measures such as GI, SuDs etc are not known at this stage. Measures to reduce the risk of overheating will need to be considered. The incorporation of accessible open space and GI may help to reduce the UHI effect.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. Existing on-site uses and buildings would be replaced by new development and could address any potential contamination from previous uses. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Aspen Way and North Quay. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Aspen Way and North Quay site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Aspen Way and North Quay site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Aspen Way and North Quay site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Aspen Way and North Quay site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Aspen Way and North Quay site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Aspen Way and North Quay site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Aspen Way and North Quay is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA11: Tower Hamlets Conservation Strategy and relevant Conservation Area Character Appraisals should be referred to minimise the impacts on the historic environment. The council should also work in partnership with Historic England.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's SFRA in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p>							

Site Name	Billingsgate Market							
Site Capacity	3,000							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>IIA13: Development should be delivered in line with policy BO3 and guidance from the Environment Agency.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-24 – Crossharbour

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site has potential to provide approximately 2500 homes. However, at this stage, it is not known how many of these units will be affordable and wheelchair adaptable. The site has good existing access to most community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including educational provision, health and community facilities.
IIA2: Human Health	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high. The site will deliver new community facilities and NHS services and so it is expected that improvements to health and wellbeing will be delivered. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The Crossharbour site is defined as a primary shopping area. The development is expected to create a new town centre with provision for a variety of retail, leisure and community uses. The inclusion of ground floor active uses will support town centre viability and changing retail patterns, integration with residential development will improve and enhance connectivity between business clusters and the housing market.
IIA4: Employment & Skills	+	M	D/I	L	I	P	LT	The site will include retail space, as well as other leisure and community uses which is considered to provide employment opportunities. It is anticipated that other comparable uses may come forward which could include other employment spaces. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 2500 new homes will help towards meeting LBTH's housing target. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
IIA6: Crime & Safety	+	L	D/I	L	I	P	LT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network. There is poor access to the underground at the site. This is reflected in the site having a PTAL level of between 2-4. The site is expected to improve walking and cycling connections, and the provision of a bus interchange which will support new sustainable transport options for future population growth. The site is well located to local facilities and services which will allow residents to live their lives more locally.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D/I	L	R/I	P/T	MT/LT	The site is adjacent to deciduous woodland and borders the Mudchute Park Farm Local Nature Reserve. The site is also located in close proximity to a number of SINCS, with Mudchute Farm and Park SINC located on the border of the site. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI; however it is unknown whether the site will be in line with BNG targets.
IIA10: Landscape & Townscape	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is adjacent to an area of Local Open Green Space (Mudchute Farm and Millwall Park), the site is also situated in the Millwall Inner Dock Cluster Tall Buildings Zone. It is therefore expected that the development of the site will respond to the existing character of the surrounding built environment, taking into particular consideration the massing of the surrounding area. The site will incorporate GI as part of the design including the increase in public realm and public open spaces.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. Consideration should be given to ensure there is no impact on the setting of the historic docks and Maritime Greenwich World Heritage Site to the South, and the adjacent listed building, the Carnegie Library. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site has fairly good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, specific climate resilience design measures are unknown, but the inclusion of GI may help to alleviate the UHI effect
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational however it is expected that the development could demonstrate potential to connect to the Barkantine Energy Centre. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Samuda Estate and Limeharbour.</p> <p>IIA1/2: If construction of this site and the Samuda Estate and Limeharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Samuda Estate and Limeharbour sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Samuda Estate and Limeharbour sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape in combination with neighbouring sites Samuda Estate and Limeharbour.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archaeology from both this site and the Samuda Estate and Limeharbour site.</p> <p>IIA14: If construction of this site and the Samuda Estate and Limeharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Samuda Estate and Limeharbour sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Samuda Estate and Limeharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Samuda Estate and Limeharbour sites are likely to result in a cumulative increase in waste.</p>							

Site Name	Crossharbour							
Site Capacity	2,500							
Site Source	Existing allocation							
Site Status	Existing allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-25 – Limeharbour

Site Name	Limeharbour							
Site Capacity	1900							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped-pending decision)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	L	I	P	LT	The site has potential to provide approximately 1900 homes. The number of affordable homes for the entire site is not currently realised. It is expected that 35% affordable housing could be provided. 10% of units will be designed to be wheelchair accessible. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. At this location, issues of overcrowding are higher than the borough average and so it is important to ensure that the provision of services will help to support the changing demographic.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, the site is within the 30-50% most deprived in terms of health. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
IIA3: Economy & Town Centres	+/-	M	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is adjacent to the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre.
IIA4: Employment & Skills	++	M	D	L	I	P	LT	Limehouse is well located to existing employment areas including the Isle of Dogs Activity Zone. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has capacity to provide approximately 1900 homes, which will provide a net increase in the number of dwellings within the borough. The number of affordable homes for the entire site is not currently realised. It is expected that 35% affordable housing could be provided. 10% of units will be designed to be wheelchair accessible. The size, type and tenure of housing will need to take into account different groups in the community, and it is

Site Name	Limeharbour							
Site Capacity	1900							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped-pending decision)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								expected that the site will maximise the provision of family homes. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
IIA6: Crime & Safety	+	L	D/I	L	I	P	LT	Currently, the site scores within the 30-50% most deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has average access to public transport, as reflected in a PTAL score between 3-4, the site is situated within reasonable proximity to bus stops and underground and overground stations. Improvements to cycling and walking connections to, from and within the site are assumed including to the wider area's employment and amenity spaces. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
IIA8: Accessibility	+	L	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to the legibility of the site will improve the accessibility of the site. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	MT/LT	The Mudchute Park Farm Local Nature Reserve is located approximately 0.5km to the south of the site, and mud flat priority habitats are located to the east. There are also a number of SINCs located within close proximity of the site. There is a potential for a negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI..
IIA10: Landscape & Townscape	+/-	M	D/I	L	R/I	P/T	ST/LT	The Canary Wharf Area Strategically Important Skyline is situated to the North of the site, and the site itself is within the boundaries of the Millwall Inner Dock Cluster Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

Site Name	Limeharbour							
Site Capacity	1900							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped-pending decision)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the historic docks and the setting of the Maritime Greenwich World Heritage Site to the South. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, however, levels of NO ₂ are >28-43µ/m ³ . The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. Measures are expected to be implemented in the design of buildings to minimise the effects of heating and cooling including a range of planting to improve the GI provision.
IIA16: GHG Emissions	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that the development could connect to the Barkantine Energy Centre. Energy demand is also expected to be met by using air source heat pumps and a centralised distribution network. Passive design features are expected to improve energy efficiency.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	Limeharbour							
Site Capacity	1900							
Site Source	Existing allocation							
Site Status	Existing allocation (undeveloped-pending decision)							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Samuda Estate and Crossharbour.</p> <p>IIA1/2: If construction of this site and the Samuda Estate and Crossharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Samuda Estate and Crossharbour sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Samuda Estate and Crossharbour sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape in combination with neighbouring sites Samuda Estate and Crossharbour.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Samuda Estate and Crossharbour site.</p> <p>IIA14: If construction of this site and the Samuda Estate and Crossharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Samuda Estate and Crossharbour sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Samuda Estate and Crossharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Samuda Estate and Crossharbour sites are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							



Marsh Wall East

Table G-26 – Marsh Wall East

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	L	I	P	LT	The site has potential to provide approximately 2400 homes, which will work positively towards achieving the borough's housing target. Of the 332 residential units currently permitted, 71 are affordable, and 10% will be wheelchair accessible. The site has existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide a small open space, primary school and health facility to meet the needs of groups now, but also the needs of the future population. The site will provide a new primary school and open space, to meet the needs of groups now and in the future.
IIA2: Human Health	++	M	D/I	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and it also expected to deliver further community services and facilities through the provision of new healthcare and new open spaces which will improve access to health services, as well as improve physical and mental health and wellbeing and reduce level of loneliness. The site will deliver new community facilities and services and so it is expected that improvements to health and wellbeing will be delivered. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population. Additionally, the site will ensure that the eastern side of the site is suitably mitigated against potential noise from the data centre uses within this area, in line with the Agent of Change principle. This will reduce noise pollution and nuisance, therefore reducing mental stress and improving mental wellbeing.
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	The South Quay neighbourhood centre is located at the west of the site. The site also falls within the Isle of Dogs Activity Area, and so the provision of residential and employment space within the site is expected to improve and enhance the connectivity between business clusters and the housing market. The site also includes 10,500sqm of retail floorspace which will improve the local economy. However, it is imperative that any retail development does not detrimentally impact on the vitality of the designated retail centre.
IIA4: Employment & Skills	++	M	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area. This will likely improve access for residents to employment opportunities. It is assumed that employment space will be delivered as part of the development of the site, and so will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	++	M	D	L	I	P	LT	The provision of 2400 new homes will help towards meeting LBTH's housing target. Of the 332 residential units currently permitted, 71 are affordable, and 10% will be wheelchair accessible. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.
IIA6: Crime & Safety	+	L	D/I	L	I	P	LT	There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network, this is reflected in the site having a PTAL level of between 3-4. The site is expected to improve walking and cycling connections, and the provision of a bus interchange which will support new sustainable transport options for future population growth. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to cycle and pedestrian access are expected to be delivered as part of the site.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has access to some facilities and services and the proposal includes further provision for community facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	MT/LT	The site is within close proximity to a mudflat priority habitat and a number of SINCs. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, and it is anticipated that improvements will be made to biodiversity and ecology along the water's edge.
IIA10: Landscape & Townscape	+/-	M	D	L	R/I	P/T	ST/LT	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. The site is also adjacent to the Coldharbour Conservation Area. Any development of the site will need to protect and enhance the setting of heritage assets, including the historic docks and the Maritime Greenwich World Heritage Site. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the Middle and South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. The site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. The development is expected to deliver external landscapes areas to improve GI networks. Buildings will be designed to ensure water efficiency and overheating are mitigated, thus improving overall climate resilience.
IIA16: GHG Emissions	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Passive design and energy efficiency measures are expected to reduce energy demand. Connections for future heat networks are expected to be delivered as part of the site's development. No renewable energy measures are expected to be included within the scheme's design.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Marsh Wall East							
Site Capacity	2400							
Site Source	Existing allocation							
Site Status	Site partially consented (under construction), remaining existing allocation un-developed							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites .</p> <p>IIA1/2: If construction of this site and the Limeharbour and Marsh Wall West sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Limeharbour and Marsh Wall West sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Limeharbour and Marsh Wall West sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape and the strategically important skyline in combination with neighbouring sites Limeharbour and Marsh Wall West.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Limeharbour and Marsh Wall West.</p> <p>IIA14: If construction of this site and the Limeharbour and Marsh Wall West sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Limeharbour and Marsh Wall West sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Limeharbour and Marsh Wall West sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Limeharbour and Marsh Wall West sites are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Marsh Wall West

Table G-27 – Marsh Wall West

Site Name	Marsh Wall West							
Site Capacity	2625 (+1000 student rooms + 800 co-living units)							
Site Source	Existing allocation							
Site Status	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	R	I	P	LT	The site will provide 2,625 new homes and has potential to provide at least 1000 new rooms for students and 800 co-living units, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable across the whole site. Given the inclusion of co-living and PBSA some development of the site will not contribute affordable housing. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. These units have the potential to benefit both students and the wider community, by delivering other priorities such as affordable housing. The introduction of student housing could potentially complement the existing mix of uses and the provision of local services, including public transport.
IIA2: Human Health	++	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness. It will ensure that the needs of all groups will be met both now and in the future.
IIA3: Economy & Town Centres	+/-	M	D	L	I	P	LT	There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is partially located within the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
IIA4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf Major Centre and primary shopping areas. This will likely improve access for residents to employment opportunities. Employment space delivered as part of the development of the site will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	R	I	P	LT	The site has capacity to provide 2,625 homes, including 1000 student rooms and 800 co-living units which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable across the whole site. Given the inclusion of co-living and PBSA some development of the site will not contribute affordable housing. The inclusion of co-living units is assumed to

Site Name	Marsh Wall West							
Site Capacity	2625 (+1000 student rooms + 800 co-living units)							
Site Source	Existing allocation							
Site Status	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								provide more flexible housing and will contribute a range of housing options within the site. It is assumed the site will deliver a proportion of wheelchair adaptable homes.
IIA6: Crime & Safety	+/-	L	I	L	R	P	MT	The provision of student accommodation has potential for adverse effects on the amenity of neighbouring residents and businesses, particularly in relation to noise and anti-social behaviour. There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 3 and 5. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	++	H	D	R	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to wayfinding across the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R	T	ST	The site is adjacent to Millwall and West India Docks SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the inclusion of GI and public realm improvements, could help to provide small scale habitats.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site lies within the Canary Wharf Area Strategically Important Skyline, and within the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within Isle of Dogs Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
IIA12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.
IIA13: Water Quality	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems

Site Name	Marsh Wall West							
Site Capacity	2625 (+1000 student rooms + 800 co-living units)							
Site Source	Existing allocation							
Site Status	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. Although, given it will be utilised by students, car usage is assumed to be low, regardless of location. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+	H	D	R	I	P	LT	Overall climate risk is medium and overall heat risk is medium-high. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. Various SuDS, landscaping and design measures to limit overheating are expected to be delivered, which in turn will reduce vulnerability to the impacts of climate change.
IIA16: GHG Emissions	+	H	D	R	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. The development of the site is expected to maximise energy efficiency through a fabric first approach which will reduce energy demand.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed and brownfield land and will support the protection of the borough's green spaces. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marshwall East and Millharbour. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Marshwall East and Millharbour site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Marshwall East and Millharbour site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive</p>							

Site Name	Marsh Wall West							
Site Capacity	2625 (+1000 student rooms + 800 co-living units)							
Site Source	Existing allocation							
Site Status	Various planning applications determined for some residential and non-residential. Remaining areas of the site are pending planning decision.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Marshwall East and Millharbour site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Marshwall East and Millharbour site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Marshwall East and Millharbour site is likely to increase resilience to the UHI effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Marshwall East and Millharbour site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Marshwall East and Millharbour is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-28 – Millharbour

Site Name	Millharbour							
Site Capacity	1700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide 1,700 new residential units, which will work positively towards achieving the borough's housing target. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide a small open space, primary school and secondary school to ensure that the needs of all groups will be met both now and in the future.
IIA2: Human Health	+	H	D	R	I	P	LT	As well as housing, the site includes new retail and employment opportunities, new parks and open spaces and improvements to the public realm. The site will reduce levels of health inequalities and provide new facilities which will improve physical and mental health and wellbeing and reduce levels of loneliness.
IIA3: Economy & Town Centres	++	M	D	L	I	P	LT	There is an allowance for employment uses including office and retail space as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area. The site is partially located within the South Quay neighbourhood centre, and so it is imperative that development does not impact on the function of this retail centre. The site will improve and enhance connectivity between business clusters and the housing market and improve town centre viability.
IIA4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf Major Centre and primary shopping areas. This will likely improve access for residents to employment opportunities. Employment space delivered as part of the development of the site will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+/-	H	D	R	I	P	LT	Housing prices in the ward far exceed the London average. The provision of 1,700 new homes will help towards meeting the borough's housing target. It is expected that 26.6% affordable housing will be delivered. It is expected that 10% of housing units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is currently located within an area of moderate crime deprivation (predominantly the top 40% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.

Site Name	Millharbour							
Site Capacity	1700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has average access to public transport via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 2 and 4. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R	T	ST	The site is adjacent to Millwall and West India Docks SINC. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the inclusion of GI and public realm improvements, could help to provide small scale habitats
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site lies predominantly within the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within Isle of Dogs Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Enhancement to the public realm will help to improve the setting of the historic environment.
IIA12: Flooding	?	N/A	N/A	N/A	N/A	N/A	N/A	The site sits between an area of flood zone 2 and flood zone 3. The site gives limited detail as to how it intends to manage the flood risk of the area. The inclusion of rainwater harvesting could help to slow the flow of stormwater and help prevent floods, particularly overflows from sewers. However, it is not known if this will be sufficient in tackle flood risk issues on site.
IIA13: Water Quality	+/-	H	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Rain and stormwater harvesting can also lessen the environmental impact of urbanisation on stormwater drainage systems and receiving water bodies, particularly as surface water run-off from heavy rainfall collects pollutants such as oil and trace metals.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and community facilities and could (assuming provision meets population demands) allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative

Site Name	Millharbour							
Site Capacity	1700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Overall climate risk and overall heat risk are medium-high. The site is expected to include public realm improvements and additional GI, which could help to alleviate the UHI effect. . Currently, specific climate resilience design are unknown.
IIA16: GHG Emissions	+	H	D	L	I	P	T	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. A range of passive design measures are expected to reduce energy demand. A site wide district heating network is expected to be delivered.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed and brownfield land and will support the protection of the borough's green spaces. Existing onsite uses and buildings would be replaced by new development and could address any potential contamination from previous uses. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marshwall West and Marshwall East. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Marshwall West and Marshwall East site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Marshwall West and Marshwall East site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Marshwall West and Marshwall East site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Marshwall West and Marshwall East site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA15: The increase in open space GI potentially provided by both this site and the Marshwall West and Marshwall East site is likely to increase resilience to the UHI</p>							

Site Name	Millharbour							
Site Capacity	1700							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
	<p>effect. However, the exact climate resilience measures are not yet known.</p> <p>IIA16: The construction of both this site and the Marshwall West and Marshwall East site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Marshwall West and Marshwall East is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features, and to avoid interference with the visual amenity of the historic environment.</p> <p>IIA9: In line with Policy BO1 and BO4, the site must achieve a minimum UGF and BNG targets set out within the Plan. Developments must demonstrate BNG and ensure it is measurable against metrics.</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces. Compliance with the requirements of the London View Management Framework and World Heritage Site Management Plans is essential.</p> <p>IIA12: Development should accord with any flood mitigation and adaptation measures stated within the borough's Strategic Flood Risk Assessment (SFRA) in line with Policy CG6, including a sequential test. The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding. A revised flood risk assessment should be submitted to demonstrate compliance with London Plan Policy 5.12.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA16: The application of Policy CG4 will require major developments to assess whole lifecycle carbon emissions and meet best practice embodied carbon emissions targets for building elements. This policy sets out limits for embodied carbon which should be monitored.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4. Development proposals which seek to maximise the efficiency and/or capacity of waste facilities in the borough will be supported in line with Policy RW1.</p>							

Table G-29 – North Quay

Site Name	North Quay							
Site Capacity	1250							
Site Source	Existing allocation							
Site Status	Consented							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	+	H	D	R	I	P	LT	The site has capacity to provide 1250 homes, which will work positively towards achieving the borough's housing target. It is expected that the site will provide 30% affordable housing, however this falls below the target set in policy. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
I/A2: Human Health	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however no new health facilities are proposed. The development of the site will include open spaces and improvements to public realm, which is expected to improve physical and mental health and wellbeing and reduce levels of loneliness.
I/A3: Economy & Town Centres	++	H	D	R	I	P	LT	The site borders the Isle of Dogs Activity Area, and so it is expected that key employment opportunities are available for future residents and will improve and enhance connectivity between business clusters and the housing market. It is expected that development will also deliver gyms, hotels and restaurants to expand the provision of different markets. The site is well located to local retail centres, including the Westferry/Pennyfields neighbourhood parade and the Canary Wharf primary shopping area, and so development is likely to improve footfall to these areas. However, it is imperative that any retail provision within the site does not impact on the vitality of local high streets.
I/A4: Employment & Skills	++	H	D	L	I	P	LT	Employment and income deprivation is low in the area, as reflected in the proximity to the Isle of Dogs Activity Area. The development of the site is expected to provide additional employment space through the delivery of mixed-use development and extend the existing good access to jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	+	H	D	L	I	P	LT	The site has capacity to provide 1250 new homes. The site is amongst the most deprived in terms of barriers to housing, and house prices. It is expected that the site will provide 30% affordable housing, however this falls below the target set in policy HF2. The site is expected to deliver 10% accessible homes within the affordable rented tenure and 10% within the immediate sector.
I/A6: Crime & Safety	++	L	D/I	L	I	P	LT	The site is expected to deliver improvements to public realm, including the provision of open spaces, and the creation of a green grid. Active frontages are also expected to be a key feature of the site which will improve natural surveillance within the site and in turn improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles.

Site Name	North Quay							
Site Capacity	1250							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site has average to good access to public transport, as reflected in a PTAL score between 4-5, and is situated within good proximity to bus stops and underground and overground stations. Improvements are expected to include a pedestrian route and enhancement of the Aspen Way pedestrian bridge to connect to the wider movement network and the DLR and underground stations adjoining the site are expected to promote the use of existing public transport provision. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to facilities and services. Improvements to pedestrian routes within the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R/I	P/T	MT/LT	The site is located less than 0.8km from an area of mudflat priority habitats. The site is adjacent to the Millwall and West India Docks SINC. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, however it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain
IIA10: Landscape & Townscape	+/-	M	D	L	R/I	P/T	ST/LT	The site lies within the Canary Wharf Area Strategically Important Skyline, and within the Tall Building Zone. Development of the site is, therefore, expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is located adjacent to the West India Dock Conservation Area, and the quay walls to the dock to the south of the site are Grade I listed. The site also falls within the Isle of Dogs Archaeological Priority Area. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is predominantly located within Flood Zone 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures. The site does sit within the South Poplar Masterplan area and therefore will include co-ordinated development to manage surface water and enable discharge into the docks to the south.

Site Name	North Quay							
Site Capacity	1250							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA13: Water Quality	-	H	D	L	R/I	P/T	ST/LT	The site is located in close proximity to North Dock. There is potential for increased surface runoff during construction, further polluting this watercourse. The management of surface water and the enablement of discharge into the docks to the south of the site, may also impact on water quality. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has generally good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. Public realm improvements will also include GI which could reduce exposure to the effects of urban air pollution. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction, and consideration would need to be given as to how to minimise disruption.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, full climate resilience measures are unknown. The addition of more GI and open space will help to reduce the UHI effect. SuDS and rainwater harvesting is expected to be integrated into buildings and the public realm.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that measures to improve energy efficiency of buildings will be included, as well as the use of renewable energy technologies will be delivered at the site.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	North Quay							
Site Capacity	1250							
Site Source	Existing allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Aspen Way and Billingsgate Market. The increased demand for services to support the additional population may negatively impact existing local residents if no new facilities are brought forward at sites.</p> <p>IIA1/2: If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Aspen Way and Billingsgate Market site will significantly increase the number of businesses and jobs, providing more opportunities for existing and new residents.</p> <p>IIA5: In combination, this site and the Aspen Way and Billingsgate Market site will significantly increase housing stock, contributing to the borough's housing target, whilst tackling issues of affordability.</p> <p>IIA10: If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for a temporary negative cumulative effect on the local landscape and townscape setting, as well as the visual amenity. Improvements to the public realm during operation may result in positive cumulative effects in the long term, enhancing the landscape and townscape character.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archaeology from both this site and the Aspen Way and Billingsgate Market site, resulting in a negative residual effect.</p> <p>IIA14: If construction of this site and the Aspen Way and Billingsgate Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic, a temporary effect. However, if construction timetables occurred in succession, these negative effects could be long term, though less severe.</p> <p>IIA16: The construction of both this site and the Aspen Way and Billingsgate Market site is likely to result in a significant cumulative increase in embodied carbon. Embodied carbon could be reduced if circular economy principles are applied and existing materials are repurposed.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Aspen Way and Billingsgate Market is likely to result in a cumulative increase in waste. Alignment with circular economy principles is not yet confirmed, however this could reduce the negative effect associated with waste generation.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p>							

Site Name	North Quay								
Site Capacity	1250								
Site Source	Existing allocation								
Site Status	Consented								
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects	
	IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP. IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.								

Table G-30 – Reuters

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site has capacity to provide 900 homes, which will work positively towards achieving the borough's housing target. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site is located within an area of high population density (>15,695p/h). However, the site also includes space for additional community facilities, including a primary school and nursery.
IIA2: Human Health	++	H	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however no new health facilities are proposed. The development of the site will include landscaping and improvements to public realm, which is expected to improve physical and mental health and wellbeing and reduce levels of loneliness.
IIA3: Economy & Town Centres	++	H	D	R	I	P	LT	The proposed site includes mixed use development, including commercial, business, communal and public house spaces. The site will improve and enhance connectivity between business clusters and the housing market. The site is also well located close to existing town centres and economic hubs.
IIA4: Employment & Skills	+	M	D	R	I	P	LT	The site is located 500m from the existing employment area of the Isle of Dogs Activity Area and a locally significant industrial site. The site also includes space for additional employment space. The construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	++	H	D	L	I	P	LT	The site has capacity to provide 900 new homes. The site is amongst the most deprived in terms of barriers to housing, and house prices. It is expected that the site will provide 30% affordable housing, however this falls below the target set in Policy HF2. However, the site includes a range of housing type and tenures. It is assumed the site will deliver a proportion of accessible homes.
IIA6: Crime & Safety	+/-	M	D/I	L	I	P	LT	The site is expected to deliver improvements to public realm, including the provision of open spaces, and the creation of a green grid. Active frontages are also expected to be a key feature of the site which will improve natural surveillance within the site and in turn improve rates of crime. It is expected that the site will be delivered in accordance with designing out crime principles. However, the inclusion of a public house space at the site has the potential to result in increases in anti-social behaviour, particularly during night time hours. There is also the potential for this use to increase the fear of crime in the local community.
IIA7: Sustainable Transport	++	H	D	L	I	P	LT	The site has average access to public transport, as reflected in a PTAL score of 3, and is situated within good proximity to bus stops and underground and overground stations. Improvements are expected to include walking and cycling connections to connect to the

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								wider network. Development at the site will also be accompanied by the delivery of a new riverbus station. This will improve access to the site and surrounding area. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
IIA8: Accessibility	++	M	D	L	I	P	LT	The existing site has good access to facilities and services. Improvements to pedestrian routes within the site will help to improve access to all groups inclusively. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D	L	R	P	MT	The site is adjacent to the River Thames and Tidal Tributaries SINC and in close proximity to the Saffron Avenue Pond SINC. The site also borders an area of priority habitat for mudflats. There is potential for some adverse effects on some priority habitats including mudflat and species during construction. However, the site has potential to contribute to biodiversity along within landscaping and open spaces, which could help to provide new small-scale habitats.
IIA10: Landscape & Townscape	+/-	M	D/I	L	I	P	LT	The site is located within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. There are also two areas of open space located in close proximity to the site. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Blackwall APA. There are also a small number of heritage assets located around the site. The Naval Row conservation area is also located 80m north of the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	-	H	D	L	I	P	LT	The site is located within an area of Flood Zone 3 and a flood risk zone, and is directly adjacent to the River Thames. The site is low lying and therefore has a greater probability of flooding. However, development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse.

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
I/A14: Air Quality	+/-	H	D/I	R	R/I	P/T	ST/LT	Public realm improvements include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
I/A15: Climate Change & Resilience	-	H	D	L	I	P	LT	The site is located in an area of medium high overall climate risk and medium heat risk rating. The site is also located within an area of flood zone 3, and has a diminishing resilience to climate change. Design measures have been incorporated to mitigate impacts of overheating. Green and blue infrastructure is expected to be delivered across the site. At this stage, it is understood that SuDS will be incorporated, however final details are yet to be confirmed. At this stage, climate resilience measures are unknown.
I/A16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
I/A17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
I/A18: Efficient use of Land	+	H	D	L	I	P	LT	The site is located on brownfield land. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	Reuters							
Site Capacity	900							
Site Source	Existing Allocation							
Site Status	Consented							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the Republic Estate site.</p> <p>IIA1/2: If construction of this site and the Republic Estate site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Republic Estate site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Republic Estate site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Republic Estate site.</p> <p>IIA14: If construction of this site and the Republic Estate site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and surrounding sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Republic Estate site are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and the neighbouring site Republic Estate site are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12/13: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-31 – Riverside South

Site Name	Riverside South							
Site Capacity	1650							
Site Source	Existing allocation							
Site Status	Consented for office development, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	R	I	P	LT	The site has potential to provide approximately 1,650 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site is situated in a least deprived area (10-20%) and has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities.
IIA2: Human Health	+	H	D	R	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is moderate with the site being situated in the top 30-50% of most deprived neighbourhoods nationally. There is limited information on the level of additional community infrastructure. However, it is expected the scheme will deliver a new community centre and retail complexes which will promote active and healthy lifestyles.
IIA3: Economy & Town Centres	+	H	D	R	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area and Canary Warf Major Centre. This will likely improve access for residents to employment opportunities. There is an allowance for employment floorspace as part of the development of the site, and so it is likely that the site will improve connectivity between business clusters and the housing market. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area.
IIA4: Employment & Skills	++	H	D	R	I	P	LT	Riverside South is well located to existing employment areas including the Isle of Dogs Activity Zone. The proposal of mixed-use development to include employment floorspace in a range of sizes will ensure an increase in the number of jobs and provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has capacity to provide approximately 1,650 homes, which will provide a net increase in the number of dwellings within the borough. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, and it is expected that the site will maximise the provision of family homes. It is important that affordability is taken into account, particularly considering the significant barriers to housing (10-20% most deprived with house prices exceeding London Average) within the locality.

Site Name	Riverside South							
Site Capacity	1650							
Site Source	Existing allocation							
Site Status	Consented for office development, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	D/I	L	R/I	P/T	LT	Currently, the site sits within the 10-20% least deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community. Additionally, the development will provide appropriate riparian lifesaving infrastructure along the riverside path, improving user safety.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site has good access to public transport, as reflected in a PTAL score of 5, the site is situated within reasonable proximity to bus stops, underground and overground stations, as well as the national and London cycle networks. Improvements to cycling and walking connections to, from and within the site are expected including to the wider area's employment and amenity spaces. The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to public realm are expected to increase uptake of active modes of transport.
IIA8: Accessibility	++	L	D	L	I	P	LT	The existing site has good access to facilities and services and the proposal includes further provision for community facilities and services. Improvements to the legibility of the site will improve the accessibility of the site. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the southwest of the site so there is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI.
IIA10: Landscape & Townscape	+/-	M	D/I	L	I	P	LT	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, furthermore it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade II Historic Lock south of the site, the Grade II listed building also south of the site and a Grade II listed gate North-East of the site. Two conservation areas are located within 0.4km North of the site. It is therefore anticipated that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting

Site Name	Riverside South							
Site Capacity	1650							
Site Source	Existing allocation							
Site Status	Consented for office development, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	-	H	D	L	I	P	LT	The site is located within an area of Flood Zone 3 and a flood risk zone, and is directly adjacent to the River Thames. The site is low lying and therefore has a greater probability of flooding. However, development proposals must include the raising of flood defences in line with the Thames Estuary 2100 Plan. Along the riverside, development should be set back from the water by a minimum of 16m to allow adequate access to flood defences for future maintenance and upgrading.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located adjacent to the River Thames. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a low-medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. At this stage, specific climate resilience design measures are unknown.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	Riverside South							
Site Capacity	1650							
Site Source	Existing allocation							
Site Status	Consented for office development, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Westferry and Park Place and 10 Bank Street as well as other developments within Canary Warf</p> <p>IIA1/2: If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Westferry and Park Place and 10 Bank Street sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Westferry and Park Place and 10 Bank Street sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring sites Westferry and Park Place and 10 Bank Street.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Westferry and Park Place.</p> <p>IIA14: If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Westferry and Park Place and 10 Bank Street sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Westferry and Park Place and 10 Bank Street sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Westferry and Park Place and 10 Bank Street sites are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							



Westferry Printworks

Table G-32 – Westferry Printworks

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	L	I	P	LT	The site has potential to provide approximately 950 homes. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide open space and additional educational infrastructure through a secondary school.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver open space which will promote active and healthy lifestyles and reduce social isolation.
IIA3: Economy & Town Centres	+	M	D	R	I	P	LT	The site is within the most deprived in terms of income. The site is expected to deliver mixed use development including a range of employment spaces to meet the needs of various sizes of businesses. The site is also situated in close proximity to the Isle of Dogs Activity Area, which will improve connectivity between residential uses and business clusters. Given that the site is not located in a designated retail centre, imperative that the any uses do not impact on the viability of nearby town centres.
IIA4: Employment & Skills	+	M	D	R	I	P	LT	The site is expected to provide access employment opportunities for residents. This is expected to include a range of employment spaces to meet the needs of various sizes of businesses. The Site is also within close proximity to the Isle of Dogs Activity Area, which will improve access to a range of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide approximately 950 homes, which will work positively towards achieving the borough's housing target. Further details on the level of affordable and accessible housing is required.
IIA6: Crime & Safety	+	L	D/I	L	R	P	LT	The site is within the 30-50% most deprived neighbourhoods nationally with regards to crime. The site is expected to improve public realm and provide additional open spaces which should increase natural surveillance and therefore reduce crime and fear of crime.
IIA7: Sustainable Transport	-	L	D	L	I	P	LT	The site is in good proximity to local bus stops and rail links, however there is limited access to underground links, and poor connectivity to cycle networks, this is reflected in the PTAL score of between 1b-2. It is expected that walking and cycling connections to, from and within the site will improve sustainable transport links and reduce car dependency within the local area.

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	L	D	L	I	P	LT	The exiting site has good access to facilities and services, and new community infrastructure is proposed, so residents will be able to live more locally and reduce their need to travel. Development at the site is expected to ensure connectivity to existing infrastructure.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	ST/LT	There are no statutory or non-statutory designated sites located within the site area. Mudflats (priority habitats) are located approximately 0.1km to the south west of the site and the site is adjacent to the Millwall and West India Docks SINC. There is potential for some adverse effects during construction, however increased green space is proposed as part of the development which will improve urban greening and provide GI
IIA10: Landscape & Townscape	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated within the Millwall Inner Cluster TBZ. It is expected that development will respond positively to the existing character of the surrounding built environment and its dockside location, however finalised details of this have not currently been realised. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. The site is adjacent to the Queen Mother Gardens and Sir John McDougall Gardens, it is assumed the built form will respect these open spaces in regards to their scale.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA, and will be visible from some areas of the Chapel House conservation area, the site is outside the buffer zone of the Maritime World Heritage Site, but may impact on its setting. The built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	-	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, the site will also provide an outfall for surface water drainage into the docks.
IIA13: Water Quality	-	H	D/I	L	I	P/T	ST/LT	The site is located adjacent to Millwall Dock. There is potential for increased surface runoff during construction, further polluting this watercourse. Similarly, surface water drainage outfalls may result in increased pollution of the watercourse. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Millharbour South.</p> <p>IIA1/2: If construction of this site and the Millharbour South site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Millharbour South site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Millharbour South site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on the townscape in combination with neighbouring site Millharbour South.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Millharbour South.</p> <p>IIA14: If construction of this site and the Millharbour South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Millharbour South site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Millharbour South site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Millharbour South is likely to result in a cumulative increase in waste.</p>							

Site Name	Westferry Printworks							
Site Capacity	950							
Site Source	Existing allocation							
Site Status	Consented, un-developed.							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12/13: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-33 – Wood Wharf

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	++	H	D	R	I	P	LT	The site will provide up to 3,600 new homes, of which at least 25% will be affordable and the development will include at least 10% wheelchair adaptable homes .In addition, there will be new retail and employment opportunities, healthcare facilities, new parks and open spaces and improvements to the public realm. The site has good existing access to community services and will likely reduce levels of inequalities and provide new facilities which will help to bring communities together and support a changing demographic.
IIA2: Human Health	++	H	D	R	I	P	LT	The site is located in an area with an overall moderate health deprivation (30-50% most deprived). As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and it also expected to deliver further community services and facilities through the provision of new healthcare and new open spaces which will improve access to health services, as well as improve physical and mental health and wellbeing and reduce level of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to be delivered. The site will deliver new community facilities and services and so it is expected that it will facilitate improvements to health and wellbeing. The site is expected to provide a minimum of 1ha of open space, which will improve physical and mental health and wellbeing and reduce levels of loneliness. Public realm improvements including integration into the green grid and the provision of open spaces are expected to deliver further health benefits for the population.
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	The South Quay neighbourhood centre is located at the west of the site. The site also falls within the Isle of Dogs Activity Area and Canary Wharf Major Town Centre, and so the provision of residential and employment space within the site is expected to improve and enhance the connectivity between business clusters and the housing market. It is not anticipated that retail development will be a feature of the site, however it is imperative that any retail development does not detrimentally impact on the vitality of the designated retain centre.
IIA4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to existing employment areas including the Isle of Dogs Activity Area, Canary Warf town centre and primary shopping areas. This will likely improve access for residents to employment opportunities. It is assumed that employment space will be delivered as part of the development of the site, and so will provide additional employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA5: Housing	+	M	D	L	I	P	LT	The provision of 3,600 new homes will help towards meeting LBTH's housing target The site will provide up to 3,600 new homes, of which at least 25% will be affordable and the development will include at least 10% wheelchair adaptable homes The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown.
IIA6: Crime & Safety	+	M	D/I	L	R/I	P/T	ST/LT	The site is situated within a 30-50% most deprived area in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing, public realm and open space improvements are likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
IIA7: Sustainable Transport	++	M	D	L	I	P	LT	The site is well situated in proximity to bus stops, rail station and the cycle network, this is reflected in the site having a PTAL level of between 3-6a. The site is expected to improve walking and cycling connections, which will support new sustainable transport options for future population growth, The site is well located to local facilities and services which will allow residents to live their lives more locally. Improvements to cycle and pedestrian access are expected to be delivered as part of the site.
IIA8: Accessibility	++	H	D	L	I	P	LT	The existing site has access to some facilities and services and the proposal includes further provision for community facilities and services. In addition, the site will be provisioning a new primary school and GP surgery thus increasing the allowance for residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	L	D/I	L	R/I	P/T	MT/LT	The site is within close proximity to a mudflat priority habitat. There is a potential negative effect on ecology as a result, particularly during construction. Green space is proposed as part of the development which will improve urban greening and provide GI, and it is anticipated that improvements will be made to biodiversity and ecology along the water's edge. However, it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain
IIA10: Landscape & Townscape	+/-	M	D	L	R/I	P/T	ST/LT	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Tall Building Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings are currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA11: Historic Environment	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs Archaeological Priority Area. The site is also adjacent to the Coldharbour Conservation Area and sits directly on the grade 1 Blackwall Basin. Any development of the site will need to protect and enhance the setting of heritage assets, including the historic docks and the Maritime Greenwich World Heritage Site. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	+	H	D/I	L	I	P	LT	The site is located within flood zone 2 and 3. The development of the site is supported by a Flood Risk Assessment (FRA) and will or has the capacity to raise site level defences to 6.2m AOD. Accordingly, it is considered flood risk can be adequately mitigated.
IIA13: Water Quality	+/-	H	D	L/R	I	P	ST/LT	Storm water discharge from buildings and promenades would be discharged into the docks where possible. This is more sustainable than discharging into the sewer system as the trunk sewer in Preston's 155 Road is combined. In addition, it would also increase the risk that combined sewer overflows (CSO's) would discharge foul sewerage into the River Thames during storm events. Conditions will ensure that run-off from the road network are appropriately attenuated to ensure that pollutants do not enter the dock system. However, there is potential that construction at the site may result in contamination of this water body as a result of surface runoff. The site will include opportunities for greywater re-use. If implemented, this could contribute to improving the water efficiency of the site.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. The site provides new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+	H	D	R	I	P	T	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. The site will deliver SuDS, green spaces will be used within the development to reduce the UHI effect. The design of the scheme is expected to minimise the effects of solar gains and the UHI effect by virtue of scale, massing and layout.

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	+	H	D	L	I	P	LT	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. Heating will be delivered using a site wide energy network served by a combined heat and power system. Solar PV will be incorporated into the construction of buildings. Energy efficiency design measures will minimise the energy demand of the site.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	M	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites.</p> <p>IIA1/2: If construction of this site and the Canada Square and Churchill Place and Billingsgate Market sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Canada Square and Churchill Place and Billingsgate Market sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Canada Square and Churchill Place and Billingsgate Market sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape and the strategically important skyline in combination with neighbouring sites Canada Square and Churchill Place and Billingsgate Market.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Canada Square and Churchill Place and Billingsgate Market sites.</p> <p>IIA14: If construction of this site and the Canada Square and Churchill Place and Billingsgate Market sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Canada Square and Churchill Place and Billingsgate Market sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Canada Square and Churchill Place and Billingsgate Market sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites, Canada Square and Churchill Place and Billingsgate Market, are likely to result in a cumulative increase in waste.</p>							

Site Name	Wood Wharf							
Site Capacity	3600							
Site Source	Existing allocation							
Site Status	Consented, under construction							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan.</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-34 – 10 Bank Street

Site Name	10 Bank Street							
Site Capacity	575							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	R	I	P	LT	The site has potential to provide approximately 575 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is expected that the site will provide additional facilities and services including health and community facilities. However, the closest secondary school is 1.35km away and requires crossing the river using Canary Wharf underground or ferry links.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and leisure facilities; however, health deprivation is in the top 30-50% nationally. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver pocket parks, which will provide publicly accessible open space, improving wellbeing for the local community.
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	The site is within the 30-50% most deprived nationally in terms of income. The site is located within Canary Warf Major Town Centre and is in close proximity to the Isle of Dogs Activity Area and Canary Warf primary shopping areas. The site will also include retail space within the development. This will improve proximity and availability of town centre uses within the development. The site will include the formation of active frontages and public realm improvements which will support the vitality of units and increase footfall in the area.
IIA4: Employment & Skills	+	M	D	L	I	P	LT	The site is expected to provide access employment opportunities for residents. This is expected to include a range of employment spaces, including office and retail space. The site is well located to existing employment areas including the Canary Warf Major Town Centre, the Isle of Dogs Activity Area and Canary Warf primary shopping areas. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 575 new homes will help towards meeting LBTH's housing target. However, it is unclear what proportion of homes will be made affordable and the size, type and tenure of homes. It is assumed that the site will provide 35% affordable housing, meeting the minimum target.

Site Name	10 Bank Street							
Site Capacity	575							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	I	L	I	P	LT	The site is located within an area of low crime deprivation (10%-20% least deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	L	D	L	I	P	LT	The site has good connectivity via public transport through bus and overground and underground rail. This is reflected in the PTAL score of between 5 and 6a. The site is also close to the national and London cycle networks. The site will also improve the walking and cycling connections to the South Dock from the site and create additional public access routes on the east and west, as well as between Middle and South Docks.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	-	L	I	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the northwest of the adjacent site, Riverside South, so there is a potential negative effect on ecology as a result, particularly from noise and dust spoiling during construction. However, it is unknown whether the site will be in line with BNG targets of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).
IIA10: Landscape & Townscape	+/-	M	D	L	R/I	P	LT	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings is currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Isle of Dogs APA, so it is pertinent to protect and enhance the setting of heritage assets in and around the area, including the Grade 2 Historic Lock south of the Riverside South site, the Grade 2 listed building also south of Riverside South and a Grade 2 listed gate at Wesferry/Park Place. Two conservation areas are located within 0.7km North of the site. It is therefore pertinent that the built form will need to protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. It is unknown whether there will be any enhancements to the public realm which may improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.

Site Name	10 Bank Street							
Site Capacity	575							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA12: Flooding	-	H	D	L	I	P	LT	The site is located within flood zone 2 and 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase. In line with the Integrated Water Management Plan for the Isle of Dogs and South Poplar, the site will also provide an outfall for surface water drainage into the docks.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the Middle and South Docks, thus creating potential for increased surface runoff during construction, further polluting this watercourse. In line with the South Poplar Masterplan area and the Isle of Dogs and South Poplar Integrated Water Management Plan, water management should be considered in the planning and design of development proposals.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site. The site has average access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	Climate and heat risk at the site is medium. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.

Site Name	10 Bank Street							
Site Capacity	575							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Westferry and Park Place and 10 Bank Street.</p> <p>IIA1/2: If construction of this site and the Riverside South and Marsh Wall West sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA5: In combination, this site and the Westferry and Park Place and Riverside South sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on LVMF areas in combination with neighbouring sites Westferry and Park Place and Riverside South.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets.</p> <p>IIA14: If construction of this site, the Westferry and Park Place, Riverside South and Marsh Wall West sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site, Westferry/Park Place, Riverside South and Marsh Wall West sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites, Westferry and Park Place, Riverside South and Marsh Wall West sites are likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA12/13: Surface water discharge should be coordinated with Thames Water to manage discharge and minimise pollutants that are discharged into the watercourse.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Westferry/Park Place

Table G-35 – Westferry/Park Place

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	M	D	R	I	P	LT	This site has potential to provide approximately 550 homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The site has good existing access to some community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. The site will also provide additional community facilities, however the nature of these is currently unknown.
IIA2: Human Health	+	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is in the top 30-50% nationally. There is limited information on the nature of additional community infrastructure that will be delivered to support health and wellbeing, and so further information will be required on whether the provision of services will be adequate for the increasing population. However, the site will deliver pocket parks, which will provide publicly accessible open space and improved public realm, improving wellbeing for the local community.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the 30-50% most deprived nationally in terms of income. The site is located within Canary Warf Major Town Centre and is in close proximity to the Isle of Dogs Activity Area and Canary Warf primary shopping areas. The site will also include commercial space, however at this stage it is not known if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within the 30-50% most deprived nationally in terms of employment. The site is well located to existing employment areas including the Canary Warf Major Town Centre, the Isle of Dogs Activity Area and Canary Warf primary shopping areas. It is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+	H	D	R	I	P	LT	The provision of 550 new homes will help towards meeting LBTH's housing target. However, it is currently unclear what proportion of homes will be made affordable and the size, type and tenure of homes. It is assumed that the site will provide 35% affordable housing, meeting the minimum target.
IIA6: Crime & Safety	+	M	I	L	I	P	LT	The site is located within an area of low crime deprivation (10%-20% least deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development. However, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	H	D	L	I	P	LT	The site has good connectivity via public transport through bus and overground and underground rail. This is reflected in the PTAL score of between 5 and 6. The site is also close to the national and London cycle networks. The site will also improve walking and cycling connections between the site and Middle Dock.
IIA8: Accessibility	+	H	D	L	I	P	LT	The existing site has good access to a range of facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel by car as multiple public transport options are nearby, including bus stops, underground (of which Canary Wharf is wheelchair accessible and has 14 Electric Vehicle (EV) charging points), rail and ferry. The national and London cycle networks are also nearby.
IIA9: Biodiversity & Natural Capital	-	M	D	L	R/I	P/T	ST/LT	Mud flat priority habitats are located directly to the southwest of the adjacent site, Riverside South so there is a potential negative effect on ecology as a result, particularly from noise and dust spoiling during construction. Limited information on the provision of GI is known at this stage and whether the site will be in line with BNG targets of BNG benchmark of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unclear.
IIA10: Landscape & Townscape	+/-	M	D	L	R/I	P	LT	The Canary Wharf Area Strategically Important Skyline is situated to the East and North of the site, and the site itself is within the boundaries of the Tall Buildings Zone. Development of the site is therefore expected to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of buildings is currently unknown. While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this site will enhance the quality and condition of the townscape and landscape.
IIA11: Historic Environment	--	H	D	R	R/I	P/T	ST/LT	The site is situated within the Isle of Dogs APA, so it is pertinent to protect and enhance the setting of heritage assets in and around the area as the proposed location sits directly on a Grade 2 listed gate. Two conservation areas are located within 0.4km North of the site. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Development of the site may also result in damage to, or loss of, the Grade 2 listed gate. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	This site is located within flood zone 2 and 3 and a flood risk zone. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	-	M	D	L	R/I	P/T	ST/LT	The site is located in close proximity to the River Thames and sits directly next to the North Dock, thus creating potential for increased surface runoff during construction, further polluting this watercourse. No details have been provided on how water quality will be protected through development.

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	D/I	L	R	T/P	ST/LT	Air quality is generally good at the site, however, levels of NO ₂ are >28-43µ/m ³ . The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a low-medium overall climate risk and heat risk rating. However, the site is located within an area of flood risk and flood zone 2 and 3. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Riverside South.</p> <p>IIA1/2: If construction of this site and the Westferry and Park Place and 10 Bank Street sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA5: In combination, this site and the Riverside South site will significantly increase housing stock.</p> <p>IIA10: In combination with construction at the Riverside South site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Riverside South.</p> <p>IIA14: If construction of this site and the Riverside South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Riverside South site are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site, Riverside South, are likely to result in a cumulative increase in waste.</p>							

Site Name	Westferry/ Park Place							
Site Capacity	550							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Alternative Sites RAG Analysis

Table G-36 - Alternative Sites RAG Analysis results

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA1 Population Density	Red	Red	Red	Red	Amber	Red	Red	Red	Red	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red
IIA1 Higher Education	Amber	Amber	Amber	Green	Amber	Amber	Green	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green
IIA1 Secondary Schools	Amber	Amber	Green	Amber	Green	Amber	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green
IIA1 Primary Schools	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA1 IMD Overall deprivation (LSOA)	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red
IIA2 Open Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Children Centres	Green	Red	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Community Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Allotments	Green	Green	Green	Red	Green	Red	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Red	Green
IIA2 IMD Health (LSOA)	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Red	Amber	Amber	Amber	Amber	Amber	Amber
IIA2 Life Expectancy Male	Red	Red	No data	Green	Amber	No data	Red	Red	Red	Red	Red	No data	Amber	Green	Green	Green	Green	No data	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA2 Life Expectancy Female	Amber	Amber	No data	Green	Green	No data	Amber	Amber	Red	Red	Amber	No data	Green	Amber	Amber	Amber	Amber	No data	Green
IIA2 Sport Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA2 Healthcare Facilities	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Town Centres	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Neighbourhood Parade	Red	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green
IIA3/4 Primary Shopping Areas	Green	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Red	Green	Green	Red	Green	Green
IIA3/4 Local Industrial Location	Green	Green	Red	Red	Red	Green	Green	Red	Green	Red	Red	Green	Red	Green	Green	Green	Red	Red	Green
IIA3/4 Tower Hamlets Activity Areas	Amber	Amber	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Green	Amber
IIA3/4 Central Activities Zone	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA3/4 IMD Income (LSOA)	Red	Red	Amber	Amber	Red	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red
IIA3/4 IMD Employment (LSOA)	Amber	Amber	Amber	Green	Amber	Amber	Amber	Amber	Amber	Red	Amber	Amber	Amber	Red	Red	Red	Red	Green	Red

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA3/4 Strategic Industrial Locations	Green	Green	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Green	Green	Green	Green	Red	Red
IIA5 IMD Barriers to housing (LSOA)	Red	Amber	Red	Red	Red	Red	Amber	Red	Red	Amber	Red	Red	Red	Red	Red	Red	Amber	Red	Red
IIA5 House Price	Amber	Amber	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red
IIA6 Crime Rate	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA6 IMD Crime (LSOA)	Red	Red	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Amber
IIA7/8 London Cycle Network	Green	Red	Green	Red	Green	Red	Red	Red	Red	Red	Green	Green	Green	Red	Red	Green	Red	Red	Red
IIA7/8 Tube Stations	Green	Green	Green	Red	Green	Green	Green	Green	Red	Red	Green	Red	Green	Green	Green	Green	Green	Green	Green
IIA7/8 Train Stations	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA7/8 PTAL	Amber	Amber	Red	Red	Amber	Green	Amber	Green	Amber	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Amber
IIA7/8 Bus Stops	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Amber	Green	Green
IIA7/8 National Cycle Network	Red	Red	Green	Red	Green	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red
IIA7/8 EV Charger Points	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate	
IIA9 Priority Habitat Inventory	Amber	Amber	Amber	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Amber	Red
IIA9 SAC	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SPA	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SSI	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 LNR	Green	Green	Amber	Green	Green	Green	Green	Green	Green	Amber	Green	Green	Green	Amber	Amber	Amber	Amber	Amber	Amber	Amber
IIA9 NNR	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA9 SINC	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber	Amber	Amber	Amber	Amber	Red	Red	Red	Red	Red	Red	Red
IIA10 Green Belt	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Metropolitan Open Land	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Local Open Spaces	Green	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Green	Red	Green	Green	Green
IIA10 London View Management Framework	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Tall Building Zone	Green	Green	Red	Red	Green	Red	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Red	Green
IIA10 London Squares	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA10 Strategically Important Skyline	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA11 Listed Buildings	Green	Green	Green	Green	Amber	Green	Amber	Green	Green	Green	Red	Red	Red	Amber	Green	Green	Green	Green	Green
IIA11 Scheduled Monuments	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Heritage at risk	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Conservation Areas	Red	Red	Green	Green	Red	Green	Green	Red	Red	Green	Red	Red	Red	Green	Green	Green	Red	Red	Amber
IIA11 Parks and Gardens	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA11 Archaeological Priority Area	Red	Red	Red	Red	Red	Red	Red	Red	Red	Green	Red	Red	Green	Red	Green	Green	Green	Red	Red
IIA12 Flood Zone	Green	Red	Red	Red	Red	Red	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Red	Red
IIA12 Flood Risk Area	Amber	Amber	Amber	Amber	Amber	Amber	Green	Green	Amber	Green	Green	Amber	Green	Green	Green	Green	Green	Amber	Amber
IIA13 Water Spaces	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA13 Statutory Main River	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
IIA14 NO2	Amber	Green	Green	Green	Red	Green	Green	Amber	Green	Amber	Amber	Amber	Amber	Amber	Green	Green	Green	Green	Green
IIA14 PM10	Green	Green	Green	Green	Amber	Green	Green	Green	Green	Amber	Amber	Green	Amber	Green	Green	Green	Green	Green	Green
IIA14 Air Quality	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green

Site Name	Neptune Wharf	Hamlet Industrial Estate	Millharbour South	Orchard Wharf	Tobacco Dock	Canada Square and Churchill Place	London Chest Hospital	LEB Building	72-90 Chrisp Street	TH Car Pound	Anchor Retail Park	Republic Estate	Watney Market	Devons Road (A)	Devons Road (B)	Devons Road (C)	Devons Road (D)	Hertsmere House	Samuda Estate
IIA15 Climate Risk	Red	Red	Red	Green	Red	No data	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber
IIA15 Heat Risk	Amber	Amber	Red	Amber	Red	No data	Amber	Red	Red	Red	Red	Red	Red	Red	Red	Red	Amber	Amber	Amber
IIA17 Safeguarded Wharves	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Alternative Sites Assessment Summaries

Neptune Wharf

Table G-37 - Neptune Wharf

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide around 100 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. At this stage, it is unknown whether these units will be accessible and wheelchair adaptable, and the number of homes which will be affordable, the area is located within the 30-50% most deprived neighbourhoods and so affordability will be a key consideration. The site has access to some community facilities which may help to reduce levels of inequalities. It is not clear on whether the site will provide any additional facilities. The site is not located within close proximity to secondary and higher educational institutions. The site was originally allocated to deliver a school, the site is now earmarked for housing. Therefore, further consideration as to the range and access to educational services will need to be considered to ensure that there is sufficient provision for communities.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the site. The site is adjacent to the Hackney Wick neighbourhood centre, and so consideration of maintaining the vitality and vibrancy of the existing centre will be necessary.
I/A4: Employment & Skills	+	M	D	R	I	P	LT	The site is well located within 350m of a locally significant industrial site, which may improve access for residents to employment opportunities. The potential to include employment space could provide new jobs, however details of this are not currently realised. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide approximately 100 new homes, which will contribute somewhat to the borough's housing targets, it will fall significantly below the threshold. No information is currently available on the level of affordable housing, however affordability

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								issues are apparent in the local area, therefore affordable housing must be a main consideration in the delivery of the site.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	?	N/A	N/A	N/A	N/A	N/A	N/A	Access is available to the site via public transport through bus, Overground, underground and rail. The site currently has a PTAL score of 2. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by a large increase in population. This may conversely increase the need to travel. Details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. It is unknown whether additional greenspace will be included within the site, or if BNG targets will be met.
IIA10: Landscape & Townscape	+	M	D	L	I	P	LT	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development will likely improve townscape and landscape setting.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site lies within the Fish Island Conservation Area and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. At this stage it is not clear whether development will include measures to enhance and restore the local historic environment.
IIA12: Flooding	--	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in Flood Zones 2 and 3, no details are currently understood relating to flood risk measures for the site.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is east-adjacent to a main river. No details are currently known relating to any measures to mitigate against water quality impacts.

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	I	L	R	P/T	ST/LT	Air quality at the site is good with low levels of NO ₂ and PM ₁₀ . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	Overall climate risk is high and overall heat risk is medium. Development specific climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Neptune Wharf							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater</p> <p>IIA1/2: If construction of this site and the other allocated sites at Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites.</p> <p>IIA14: If construction of this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites were to happen concurrently, there is potential for an increased deterioration in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Hepscoot Road, Hackney Wick Station, Hamlet Industrial Estate and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities. This should take into consideration the removal of the school from the development.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15/16: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices. The application of policies CG1, CG2, CG3, CG4 and CG5 will help to reduce the impacts of GHGs and increase climate resilience.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Hamlet Industrial Estate

Table G-38 - Hamlet Industrial Estate

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+/-	L	D	R	I	P	LT	The site has potential to provide around 100 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. It is expected that an affordable housing threshold of 50% may be delivered, which is key given the area is located within the 30-50% most deprived neighbourhoods. At this stage, it is unknown whether these units will be accessible and wheelchair adaptable. The site has access to some community facilities which may help to reduce levels of inequalities. It is not clear on whether the site will provide any additional facilities. The site is not located within close proximity to secondary and higher educational institutions. Therefore, further consideration as to the range and access to healthcare and educational services will need to be considered to ensure that there is sufficient provision for communities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The finer details of the development are not yet known, however the site is allocated for mixed use development which will include employment and residential floorspace, as well as restaurants and cafes. The site is adjacent to the Hackney Wick neighbourhood centre, and so consideration of maintaining the vitality and vibrancy of the existing centre will be necessary.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is well located within 300m of a locally significant industrial site, which may improve access for residents to employment opportunities. The existing uses of the site comprise of light industrial units, whilst details are not currently available, this may lead to a loss of jobs. New employment is however expected to be created through the provision of employment floorspace, however the details of this are not currently fully understood. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	+/-	L	D	R	I	P	LT	The site has potential to provide approximately 100 new homes, which will contribute somewhat to the borough's housing targets, it will fall significantly below the threshold. No information is currently available on the level of affordable housing, however due to affordability issues prevalent in the local area, affordable housing must be a main consideration in the delivery of the site.

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). Active frontages and increased access will improve public use and improve natural surveillance. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	?	N/A	N/A	N/A	N/A	N/A	N/A	Access is available to the site via public transport through bus, overground, underground and rail. The site currently has a PTAL score of 2. Public transport access, and improvements to walking and cycling should be the main consideration in the delivery of the site. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	L	D	L	I	P	LT	The existing site has fairly good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretched by population increases. This may conversely increase the need to travel. The site will deliver improved access to the lower-level towpath along the western bank of the Lee Navigation Canal; however, details are currently not available regarding any potential improvements to public realm. Any improvements should seek to improve legibility.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in close proximity to a number of SINCs. There is potential for some adverse effects on some small-scale habitats and species during construction. It is unknown whether additional greenspace will be included within the site, nor are there any details on BNG.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not situated within any designations relating to townscape nor landscape. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development will likely improve townscape and landscape setting.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site lies within the Fish Island Conservation Area and is situated with the boundary of the Lea Valley Archaeological Priority Area. During construction, there is potential for adverse effects on the setting of heritage assets from construction traffic, emissions and noise and vibration. Excavation works may result in the loss of buried archaeological assets. It is assumed the site will be designed to be in-keeping with the designated heritage assets and their setting.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located in Flood Zones 2 and 3, no details are currently understood relating to flood risk measures for the site.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is east-adjacent to a main river. No details are currently known relating to any measures to mitigate against water quality impacts.

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA14: Air Quality	+/-	M	D	L	R/I	P/T	ST/LT	Air quality is good at the site, with low levels of NO ₂ and PM ₁₀ . The site has good access to local public transport and community facilities and could allow residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. Consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	Overall climate risk is high and overall heat risk is medium and the site is at risk of flooding. Climate resilience measures are not known at this stage. Measures to reduce the risk of overheating will need to be considered. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	L	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. It is not clear whether the site will encourage sustainable use of materials.

Site Name	Hamlet Industrial Estate							
Site Capacity	100							
Site Source	New allocation - LLDC Allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby site Hepscoth Road, Hackney Wick Station, Neptune Wharf and Sweetwater</p> <p>IIA1/2: If construction of this site and the other allocated sites at Hepscoth Road, Hackney Wick Station, Neptune Wharf and Sweetwater were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Hepscoth Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Hepscoth Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Hepscoth Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites.</p> <p>IIA14: If construction of this site and the Hepscoth Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and other allocated sites in the vicinity is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Hepscoth Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Hepscoth Road, Hackney Wick Station, Neptune Wharf and Sweetwater sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-39 – Millharbour South

Site Name	Millharbour South							
Site Capacity	320							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	+	M	D	L	I	P	LT	The site has potential to provide around 320 new homes, this is well below the threshold, but will work towards achieving the borough's housing target. The area is within the 30-50% most deprived neighbourhoods. The site should seek to deliver at least 35% affordable housing and wheelchair accessible units. The site has good access to community facilities and is intended to provide further community infrastructure which will help to reduce levels of inequalities. Further consideration as to the range and access to healthcare and educational services will need to be considered to ensure that there is sufficient provision for communities.
I/A2: Human Health	++	M	D	L	I	P	LT	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high. The site will lead to additional community facilities, including open spaces which are likely to improve local health and wellbeing. A green grid is proposed which will promote active transport modes and support sustainable and healthy living for residents.
I/A3: Economy & Town Centres	+	M	D	L	I	P	LT	Finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development to include employment space and retail offering which may improve the footfall to the Crossharbour district centre, therefore improving vitality. There are some businesses currently located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units may be a key concern.
I/A4: Employment & Skills	++	H	D	L	I	P	LT	The site is well located to the Isle of Dogs activity area, which will improve access for residents to employment opportunities. The site is within the 30-50% most deprived in terms of income and employment, and so ensuring sufficient access to a range of employment opportunities is imperative, a range of sizes of employment floorspaces are proposed to serve small to medium enterprises and therefore respond to changing demands in the employment market. There are some businesses located across the site and it could result in a net loss of jobs. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide 320 new homes. which will contribute to the borough's housing targets, however, it will fall significantly below the threshold. Significant affordability issues are apparent in the local area, therefore affordable housing must be a main consideration in the delivery of the site.

Site Name	Millharbour South							
Site Capacity	320							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	D/I	L	R	P	LT	The site is located within the 30-50% most deprived neighbourhoods in terms of crime. Improvements to public open spaces, provision of walking and cycling links and the prioritisation of active frontages are expected to increase natural surveillance and therefore improve crime rates and fear of crime. There is limited detail on whether designing out crime principles will be applied as part of the development, or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	+/-	M	D	L	I	P	LT	The site is within close proximity to Tube and Train Stations, and easily access from bus stop within the site's proximity. The site is also served by both the National and London Cycle Network. Despite this, within the site there appear to be significant variances, as reflected in a PTAL score of 1b-5. Improvements and enhancements to walking and cycle links will help to facilitate a modal shift towards more sustainable modes.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services, and new community infrastructure is proposed, so residents will be able to live more locally and reduce their need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R/I	P/T	ST/LT	The site is less than 0.8km from the Mudchute Park Farm Local Nature Reserve and the site is adjacent to the Millwall and West India Docks SINC. There are no designated sites within the site's boundary. There is potential for some adverse effects during construction, however increased green space is proposed as part of the development which will improve urban greening and provide GI
IIA10: Landscape & Townscape	+	M	D	L	I	P	ST/MT	While there are likely to be temporary negative effects to the local landscape and townscape setting during construction, improvements to public realm at this Site will enhance the quality and condition of the townscape and landscape. The site is located within the Millwall Inner Dock Cluster Tall Buildings Zone, and so it is expected that the built form of development will respond positively to the surrounding built environment.
IIA11: Historic Environment	+/-	M	D/I	L	R/I	P/T	ST/LT	The site is located within the Isle of Dogs Archaeological Priority Area and is located close to the Maritime Greenwich world heritage site. It is therefore anticipated that the built form will protect and enhance the setting of heritage assets. Enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets
IIA12: Flooding	-	H	D	L	I	P/T	ST/LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to Millwall Dock. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.

Site Name	Millharbour South							
Site Capacity	320							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. It is expected that the development could demonstrate potential to connect to the Barkantine Energy Centre and utilise the low carbon heat network. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Westferry Printworks.</p> <p>IIA1/2: If construction of this site and the Westferry Printworks site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Westferry Printworks site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Westferry Printworks site will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects on townscape in combination with neighbouring site Westferry Printworks.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Westferry Printworks site.</p> <p>IIA14: If construction of this site and the Westferry Printworks site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Westferry Printworks site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Westferry Printworks site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Westferry Printworks is likely to result in a cumulative increase in waste.</p>							

Site Name	Millharbour South							
Site Capacity	320							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-40 – Orchard Wharf

Site Name	Orchard Wharf							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 350 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The proposed site is located close to London City Island town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 350 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (30%-50% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	--	M	D	L	R	P	LT	The site is not well located for public transport use. There is one bus stop in close proximity to the site and the closest overground rail station is 650m away. The site has a PTAL score of between 0 and 1b. This is likely to increase the need for residents to travel by car to access local services and facilities. It is also unclear if any additional public transport provision will be proposed as part of the site.

Site Name	Orchard Wharf							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	--	M	D	L	R	P	LT	The site is not well located for public transport use or local facilities and services. The site has a PTAL score of between 0 and 1b. Therefore, there is potential for the exclusion of social groups who rely on public transport. It is unclear if the site includes new facilities or services to meet the needs of the growing population in this area.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat. There is potential for some adverse effects on some small scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the BNG target of 2.5 biodiversity unit (BU) per hectare or 30% gain is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to Local Open Space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting. The site also borders the tall building zone, and there is potential for tall buildings to occur at this site, altering the view. However, this is currently uncertain.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Limmo APA. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within a flood risk area and within flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to the River Thames. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
IIA14: Air Quality	+/-	M	D/I	L	R	P/T	ST/LT	The site provides access to bus and train services, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the

Site Name	Orchard Wharf							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the nearby sites of Blackwall Trading Estate and Leamouth Road Depot and Reuters.</p> <p>IIA1/2: If construction of this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA10: In combination with construction at the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites.</p> <p>IIA14: If construction of this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Blackwall Trading Estate and Leamouth Road Depot and Reuters sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites of Blackwall Trading Estate and Leamouth Road Depot and Reuters is likely to result in a cumulative increase in waste.</p>							

Site Name	Orchard Wharf							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12/13: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-41 – Tobacco Dock

Site Name	Tobacco Dock							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain how many homes would be provided at the site. Additionally, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however it's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The proposed site is located close to multiple town centres, including Watney, Wapping Lane and Thomas Moore Street, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	+	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. It is currently uncertain if the site will include any additional retail space.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently unclear how many homes the site will provide. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (30%-50% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, Overground, underground and rail. The site has a PTAL score of between 2 and 4. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to transport, facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.

Site Name	Tobacco Dock							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small scale habitats and species during construction, as a result of noise and dust spoiling. No information has been provided on provision of GI. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to multiple areas of Local Open Space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape and townscape setting.
IIA11: Historic Environment	--	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity, including the Shadwell Roman Settlement Scheduled Monument.. The site is located within the Shadwell Roman Settlement archaeological priority area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. Development of the site may also result in damage to, or loss of, the scheduled monument.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	M	D/I	L	R	P/T	ST/LT	The site provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing

Site Name	Tobacco Dock							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with the nearby site of London Dock.</p> <p>IIA1/2: If construction of this site and the London Dock site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA10: In combination with construction at the London Dock site, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the London Dock site.</p> <p>IIA14: If construction of this site and the London Dock site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the London Dock site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site of London Dock is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Canada Square/Churchill Place

Table G-42 – Canada Square/Churchill Place

Site Name	Canada Square/Churchill Place							
Site Capacity	250							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site will provide 250 new homes, which will not make a significant contribution to meeting the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities, and the life expectancy is higher than the national average for both males and females and health deprivation is low. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The proposed site is located in a town centre and is adjacent to a primary shopping area, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if Churchill Place Shopping Mall will be lost as a result of the site and if the site will include any additional retail space.
IIA4: Employment & Skills	+/-	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document. The site does however remove the opportunity for potential employment space in this location.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site will provide 250 new homes, which will not make a significant contribution to meeting the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of low crime deprivation (lowest 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
IIA7: Sustainable Transport	-	L	D	L	I	P	LT	Access is readily available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 6a and 5. There are no plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services, shown by the site having a PTAL scores ranging between 6a and 5. The site will allow residents to live their lives more locally and reduce the need to travel.

Site Name	Canada Square/Churchill Place							
Site Capacity	250							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA10: Landscape & Townscape	-	L	D/I	L	R	T	ST	The site is located next to designated open space. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to enhance the existing and provide further open spaces and the public realm and improve the quality and condition of the townscape and landscape.
IIA11: Historic Environment	-	L	I	R	I	P	LT	The site is located within an APA, and 0.3km from Coldharbour Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is partially located within Flood Zones 2 and 3 and therefore is within a Flood Risk Area. Development will therefore need to comply with any flood mitigation and adaptation measures.
IIA13: Water Quality	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to a waterway leading from the River Thames. There is potential that construction at the site may result in contamination of this water body as a result of surface runoff. Currently, no water quality measures are known to be included within the development.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Canada Square/Churchill Place							
Site Capacity	250							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 250 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites of Wood Wharf and Billingsgate Market.</p> <p>IIA1/2: If construction of this site and the Wood Wharf and Billingsgate Market sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Wood Wharf and Billingsgate Market sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Wood Wharf and Billingsgate Market sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Wood Wharf and Billingsgate Market sites.</p> <p>IIA14: If construction of this site and the Wood Wharf and Billingsgate Market sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Wood Wharf and Billingsgate Market sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites of Wood Wharf and Billingsgate Market is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/5/8: Units within the site should be made accessible and wheelchair adaptable.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum urban greening factor UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12/13: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

London Chest Hospital

Table G-43 - London Chest Hospital

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 290 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high so affordability needs to be a key consideration. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, however, health deprivation is high (30%-50% of most deprived neighbourhoods) and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located within close proximity to a primary shopping area, neighbourhood parade and town centre. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 290 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of medium crime deprivation (top 30-50% of most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site has good access to the site via public transport through bus, overground, underground and rail. However, the underground rail is located 610m from the site. This is reflected by the site having a PTAL scores ranging between 2 and 4. It is uncertain if there are plans for additional transport provision.

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located 60m south of Local Open Space at Victoria Park. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	--	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity and is located within St James' Cemetery and Bonner Manor Archaeological Priority Area, and within the Victoria Park Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. The site is also likely to result in the demolition of existing listed buildings at the site, and alterations to the remaining main hospital listed building. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	-	L	D	L	I	T	ST	The site is located 50m south of the Grand Union Canal. There is potential for increased surface runoff during construction, further polluting this watercourse.
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors and schools surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Marian Place Gasworks and The Oval.</p> <p>IIA1/2: If construction of this site and the Marian Place Gasworks and The Oval site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA5: There is potential for cumulative effects on housing as a result of this site in combination with Marian Place Gasworks and The Oval.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Marian Place Gasworks and The Oval site.</p> <p>IIA14: If construction of this site and the Marian Place Gasworks and The Oval site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Marian Place Gasworks and The Oval site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Marian Place Gasworks and The Oval is likely to result in a cumulative increase in waste.</p>							

Site Name	London Chest Hospital							
Site Capacity	290							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: Phase 1 habitat surveys should be undertaken to determine if there are any species residing in the areas of priority habitat.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-44 - LEB Building

Site Name		LEB Building						
Site Capacity		190						
Site Source		New allocation						
Site Status		New allocation						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not meet the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high so affordability needs to be a key consideration. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high (30%-50% of most deprived neighbourhoods) and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is located adjacent to a primary shopping area and town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas. It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus, overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6b. It is uncertain if there are plans for additional transport provision.
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.

Site Name	LEB Building							
Site Capacity	190							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located adjacent to areas of priority habitat for deciduous woodland. There is potential for some adverse effects on some small-scale habitats and species during construction, as a result of noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located 20m from Local Open Space at Bethnal Green Gardens. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity, including listed buildings and the registered park and garden of Bethnal Green Gardens. The site is also located within Bethnal Green Archaeological Priority Area, and within Bethnal Green Gardens Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium-high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing

Site Name	LEB Building							
Site Capacity	190							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with nearby sites of Anchor Retail Park and Whitechapel North.</p> <p>IIA1/2: If construction of this site and the Anchor Retail Park and Whitechapel North sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Anchor Retail Park and Whitechapel North sites will significantly increase the number of business and jobs.</p> <p>IIA10: In combination with construction at the Anchor Retail Park and Whitechapel North sites, temporary adverse impacts on landscape and townscape during the construction phase will be more severe in extent.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Anchor Retail Park and Whitechapel North sites.</p> <p>IIA14: If construction of this site and the Anchor Retail Park and Whitechapel North sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Anchor Retail Park and Whitechapel North sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites of Anchor Retail Park and Whitechapel North is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with Policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-45 – 72-90 Chrisp Street

Site Name		72-90 Chrisp Street						
Site Capacity		150						
Site Source		New allocation						
Site Status		New allocation						
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not make a significant contribution to meeting the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. The site has high levels of population density (higher than the 15,695p/h). The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. Additional housing may therefore put strains on existing community facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is well located, in close proximity to a number of town centres, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
IIA4: Employment & Skills	+	M	D	L	I	P	LT	The site is well located close to Empson Street SIL, Canary Wharf major centre, and the Isle of Dogs Activity Area, providing opportunities for access to employment. However, it is unclear if there will be any provision for additional employment within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 190 homes, which will not make a significant contribution to meeting the borough's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
IIA6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
IIA7: Sustainable Transport	+	L	D	L	I	P	LT	The site is well connected via public transport through bus and Overground rail. However, the site is located more than 800m from the closest tube station. This is reflected in the site's PTAL score, ranging between 2 and 4. It is uncertain if there are plans for additional transport provision.

Site Name	72-90 Chrisp Street							
Site Capacity	150							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to Local Open Space at Alton Street. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is located within Lea Valley archaeological priority area, and within Lansbury Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within a flood risk area and an area of flood zone 2, with the eastern border of the site located in an area of flood zone 3. Any flood risk measures for the site are currently unknown and are likely to be determined during the design phase.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has existing good air quality and provides good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	--	H	D	L	I	P	LT	The site is located in an area which has a high overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	72-90 Chrisp Street							
Site Capacity	150							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	H	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with Chrisp Street and Teviot Estate.</p> <p>IIA1/2: If construction of this site, Chrisp Street, and Teviot Estate were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site, the Chrisp Street, and Teviot Estate sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site, Chrisp Street, and Teviot Estate sites will significantly increase housing stock.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from this site, Chrisp Street and Teviot Estate.</p> <p>IIA14: If construction of this site, Chrisp Street and Teviot Estate were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site, Chrisp Street and Teviot Estate is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring sites of Chrisp Street and Teviot Estate is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA12: The application of SuDS techniques (in line with Policy CG7) should be demonstrated by developments to reduce the risk of run-off and surface water flooding.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Tower Hamlets Car Pound

Table G-46 – Tower Hamlets Car Pound

Site Name	Tower Hamlets Car Pound							
Site Capacity	120							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 120 homes, which will not make a significant contribution to meeting the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is high, so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high (10%-20% of most deprived neighbourhoods) and life expectancy is worse than the national average for males and females. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is well located, adjacent to Limehouse town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail space.
I/A4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located away from employment areas and has a high level of employment deprivation (10% - 20% most deprived). It is unclear if there will be any provision for additional employment within the site. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is likely to provide 120 homes, which would work towards but not meet LBTH's housing target. It is also unclear what proportion of homes will be made affordable and the size, type and tenure of homes.
I/A6: Crime & Safety	+	L	I	L	R	P	MT	The site is located within an area of high crime deprivation (10%-20% most deprived neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development, however, developing the land from its existing use and providing housing and public realm improvements is likely to help to reduce crime and create a safer community.
I/A7: Sustainable Transport	+	M	D	L	I	P	LT	The site is well connected via public transport through bus and Overground rail. However, the site is located more than 800m from the closest tube station. Despite this, the site has a PTAL score ranging between 5 and 6b. It is uncertain if there are plans for additional transport provision.

Site Name	Tower Hamlets Car Pound							
Site Capacity	120							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	R	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	There are no designated sites within the site. There is an area of priority habitat 160m from the site. Construction works have the potential to negatively impact this habitat and the species within it from noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	+/-	H	D/I	R	R/I	P/T	ST/LT	The site is located in close proximity to local open space, and the London Square of York Square Gardens. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is also located within York Square Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Tower Hamlets Car Pound							
Site Capacity	120							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with Watney Market.</p> <p>IIA1/2: If construction of this site and Watney Market were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Watney Market site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Watney Market site will significantly increase housing stock.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Watney Market site.</p> <p>IIA14: If construction of this site and the Watney Market site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Watney Market site is likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Brick Lane and Pedley Street site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Watney Market is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained or newly created habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Anchor Retail Park

Table G-47 – Anchor Retail Park

Site Name	Anchor Retail Park							
Site Capacity	325							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+/-	M	D	R	I	P	LT	The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
IIA3: Economy & Town Centres	-	L	D	R	R	P	LT	The proposed site does not propose mixed use development such as employment space or retail and removes the current retail provision within the site.
IIA4: Employment & Skills	+/-	M	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site does however remove the current retail provision within the site. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	-	L	D	R	I	P	LT	The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 5 and 6. It is not clear whether there will be plans for additional sustainable transport provision.

Site Name	Anchor Retail Park							
Site Capacity	325							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
IIA11: Historic Environment	-	L	I	R	I	P	LT	The site has a number of heritage assets within its vicinity and is located within an Archaeological Priority Area, and St Peter's and Stepney Green Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has good access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.

Site Name	Anchor Retail Park							
Site Capacity	325							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 325 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel North.</p> <p>IIA1/2: If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Whitechapel North site.</p> <p>IIA14: If construction of this site and the Whitechapel North site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Whitechapel North site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel North site is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/5/8: Units within the site should be made accessible and wheelchair adaptable.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Table G-48 – Republic Estate

Site Name	Republic Estate							
Site Capacity	300							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+/-	M	D	R	I	P	LT	The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities, and if so whether these will be open to the public.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits, however not to the threshold required to meet the borough's housing target. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It is not clear whether the current provision will meet the needs of the population of this housing allocation.
IIA3: Economy & Town Centres	+/-	L	D	R	I	P	LT	The proposed site does not propose mixed use development such as employment space or retail. The site will improve and enhance connectivity between business clusters and the housing market however removes the opportunity for potential employment space in this location.
IIA4: Employment & Skills	+/-	L	D	R	I	P	LT	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone. The site does however remove the opportunity for potential employment space in this location. However, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	-	L	D	R	I	P	LT	The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. At this stage it is not known how many units will be accessible and wheelchair adaptable.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development.
IIA7: Sustainable Transport	-	L	D	L	I	P	LT	Some access is available to the site via public transport through bus, Overground, underground and rail. This is reflected by the site having a PTAL scores ranging between 3 and 4. There are no plans for additional transport provision.
IIA8: Accessibility	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has average access to facilities and service, reflected by the site having a PTAL scores ranging between 3 and 4. At this stage it is not known how many units will be accessible and wheelchair adaptable, and if any accessible provision will be included as part of the site.

Site Name	Republic Estate							
Site Capacity	300							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA9: Biodiversity & Natural Capital	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
IIA11: Historic Environment	-	L	I	R	I	P	LT	The site has a number of heritage assets within its vicinity and is located within an Archaeological Priority Area, and adjacent to Naval Row Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site has average access to local public transport and will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction, and consideration would need to be given as to how to minimise disruption to the local residents.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a low overall climate risk and heat risk rating and is likely to have some resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, not all climate resilience measures are known at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.

Site Name	Republic Estate							
Site Capacity	300							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA18: Efficient use of Land	+/-	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will provide 300 new homes, which is below the threshold to reach the borough's housing target. It is also not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Reuters and Aberfeldy Estate.</p> <p>IIA1/2: If construction of this site and the Reuters and Aberfeldy Estate sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Reuters and Aberfeldy Estate sites.</p> <p>IIA14: If construction of this site and the Reuters and Aberfeldy Estate sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Reuters and Aberfeldy Estate sites is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Reuters and Aberfeldy Estate sites is likely to result in a cumulative increase in waste.</p>							
Mitigation and Enhancement Measures	<p>IIA1/5/8: Units within the site should be made accessible and wheelchair adaptable.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy C11 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA8/9/11: A lighting strategy should be prepared to minimise light spill onto retained habitat features.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Watney Market

Table G-49 – Watney Market

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	It is currently uncertain how many homes would be provided at the site. Additionally, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for wheelchair adaptable homes. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, health deprivation is high and life expectancy is worse than the national average for males. It's unlikely that the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The finer details of the development are not yet known. It is assumed that there could be potential to provide a mixed-use development which may include employment space and retail offering, which may help to improve the viability of the town centre. However, there are a number of small businesses located across the site and it is not clear whether these will be re-provisioned elsewhere and whether existing business owners will be compensated and/or given opportunities to buy or rent new units. Affordability of new units will be a key concern.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is well located to existing employment areas including the City Fringe Activity Area and the Central Activity Zone as well as primary shopping areas. This will likely improve access for residents to employment opportunities. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	It is unclear how many homes will be provided at the site. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is currently located within an area of high crime deprivation (top 10-20% of neighbourhoods nationally). There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	+	M	D	L	I	P	LT	Access is readily available to the site via public transport through bus and overground and underground rail. Access to the national cycle network is also nearby. This is reflected by the site having a PTAL scores ranging between 6a. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	?	N/A	N/A	N/A	N/A	N/A	N/A	The closest designated sites are priority habitats are located 0.25km south of the site in St George's gardens and whilst it does not fall within the boundary of this site, there is potential for some adverse effects on deciduous woodland found there. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher).is unknown.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not located within any LVMF or tall building areas, however, there are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage it is uncertain if the site aims to achieve high quality sustainable design for buildings, spaces and the public realm and improve the quality and condition of the townscape and landscape.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has a number of heritage assets within its vicinity and is located within close proximity to an APA and is located on the border of a Conservation Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. At this stage it is not clear whether development will include measures to enhance and restore the local historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	Air quality at this site is considered at moderate levels (>28-43µ/m ³ for NO ₂ and PM ₁₀). The site has fairly good access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is located in an area which has a high overall climate risk and heat risk rating. Development specific climate resilience are not known at this stage. Measures to reduce the risk of overheating will need to be considered. However, it is assumed that the site will

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is predominantly on previously developed land. The density of housing is not currently known nor is it clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Whitechapel South.</p> <p>IIA1/2: If construction of this site and the Whitechapel South site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Whitechapel South site will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Whitechapel South site will significantly increase housing stock.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from this site.</p> <p>IIA14: If construction of this site and the Whitechapel South site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Whitechapel South site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Whitechapel South is likely to result in a cumulative increase in waste.</p>							

Site Name	Watney Market							
Site Capacity	TBC							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA3/4: The loss of businesses should be avoided, however, in line with Policy EG4 it is assumed that there will be no net loss in employment space. Where businesses will be lost, discussions with owners should be undertaken to ensure suitable alternative locations are identified. Alternative units should where possible be equivalent in size, layout, rent and connectivity to the existing site and considered suitable by the occupier.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: Phase 1 habitat surveys should be undertaken to determine if there are any habitats/ species residing in St George's Gardens.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with policy DV4.</p>							

Table G-50 - Devons Road

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	+	H	D	R	I	P	LT	The site has potential to provide at least 2,100 new homes, which will work positively towards achieving the borough's housing target. However, at this stage, it is not known how many of these units will be affordable and whether there will be provision made for student accommodation or wheelchair adaptable homes. Overall deprivation is very high so affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. It is not clear on whether the site will provide any additional facilities. At this stage it is not clear whether development would result in the loss of this open space.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, the site is located in the 30-50% most deprived area nationally. It is unknown if the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	L	D	L	I	P	LT	The site is well located, adjacent to Devons Road neighbourhood town centre, providing opportunities for residents to live locally and improved connectivity between the housing market and town centres. It is currently uncertain if the site will include any additional retail or business space.
IIA4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is in the 10-20% least deprived nationally in terms of employment. The site is located adjacent to a strategic industrial location, offering opportunities for access to employment. At this stage it is not known if the site will offer additional facilities that offer employment options. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 2,100 new homes will help towards meeting LBTH's housing target. Further details will be required regarding the affordability of units, and the number of wheelchair accessible homes. The size, type and tenure of housing will need to take into account different groups in the community, however this is currently unknown. It is important that affordability is taken into account, particularly considering the significant barriers to housing within the locality.

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA6: Crime & Safety	+	L	D/I	L	I	P	LT	The site is located in the 10%-20% most deprived area nationally for crime. There is limited detail on whether designing out crime principles will be applied as part of the development, however, providing housing is likely to improve footfall and therefore provide additional natural surveillance, in turn reducing crime and creating a safer community.
IIA7: Sustainable Transport	+	L	D	L	I	P	LT	The site has average access to bus stops, rail station, the underground and the cycle network. This is reflected in the site having a PTAL level of between 2 and 4. The site is well located to local facilities and services which will allow residents to live their lives more locally.
IIA8: Accessibility	+	L	D	L	I	P	LT	The existing site has good access to facilities and services. The site will allow residents to live their lives more locally and reduce the need to travel. Details on additional services and facilities are unknown at this stage.
IIA9: Biodiversity & Natural Capital	-	L	D/I	L	R/I	T	ST/LT	The site is adjacent to Tower Hamlets Cemetery Park local nature reserve and areas of deciduous woodland. Construction works have the potential to negatively impact small scale habitats and species from noise and dust spoiling. At this stage BNG is assumed but whether the site meets the target of 2.5 biodiversity unit (BU) per hectare or 30% gain (whichever is higher) is unknown.
IIA10: Landscape & Townscape	+/-	M	D/I	R	R/I	P/T	ST/LT	The site is adjacent to local open space, there are likely to be temporary negative effects to the local landscape and townscape setting during construction. However, as the site currently has low townscape value, there is potential for the redevelopment of the site to result in positive effects on the public realm, improving the landscape setting.
IIA11: Historic Environment	+/-	H	D/I	R	R/I	P/T	ST/LT	The site has a number of heritage assets within its vicinity. The site is adjacent to Lea Valley Archaeological Priority Area. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets. However, the site may enhance the public realm, improving the setting of the historic environment.
IIA12: Flooding	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R	P/T	ST/LT	The site provides access to local public transport, providing the opportunity to reduce the need for private car usage, improving air quality. Public realm improvements may also include GI which could reduce exposure to the effects of urban air pollution. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating and is likely to have diminishing resilience to climate change. The addition of more GI and open space will help to reduce the UHI effect. However, climate resilience measures are

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								unknown at this stage. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	R	I	P	LT	The development is located on previously developed land and will support the protection of the borough's green spaces. The site will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring site Bow Common Lane.</p> <p>IIA1/2: If construction of this site and the Bow Common Lane site were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA5: There is potential for cumulative effects on housing as a result of this site in combination with Bow Common Lane.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archelogy from both this site and the Bow Common Lane site.</p> <p>IIA14: If construction of this site and the Bow Common Lane site were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA16: The construction of both this site and the Bow Common Lane site is likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Bow Common Lane is likely to result in a cumulative increase in waste.</p>							

Site Name	Devons Road							
Site Capacity	2100							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1: Housing should deliver at least 35% affordable home and include provision of housing to meet the needs of all population groups as set out in the Homes for the Community policies.</p> <p>IIA1/2: Further assessment as part of scheme level design, should incorporate an evaluation of the provision of healthcare and education, to ensure that the current supply is sufficient in supporting new communities. The application of Policy CI1 may also help to mitigate impacts on existing community facilities.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help manage adverse effects on the skyline and preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented onsite during both construction and operation.</p> <p>IIA14/15/16: Development should look to incorporate renewable energy generation methods (in line with Policy CG1), such as solar panels and use of low carbon heat networks, to reduce operational GHG emissions. The site should consider undertaking BREEAM Infrastructure to ensure that sustainability is integral to development.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Hertsmere House

Table G-51 – Hertsmere House

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has the potential to provide 350 new homes. However, at this stage, it is not known how many of these units will be affordable, and whether there will be provision made for wheelchair adaptable homes. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities. At this stage, details on any additional facilities are not available.
IIA2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities; however, it is unknown whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
IIA3: Economy & Town Centres	+	M	D	L	I	P	LT	The site is situated within the Isle of Dogs Activity Area and so there is likely good accessibility to employment opportunities, which is reflected in good levels of employment and income for the area. The finer details of the development are not yet known; however, it is assumed that the site will include some employment space which will provide further jobs for future residents and enhance connectivity between business clusters and the housing market. The site is located outside of a designated retail centre, and so any development should not impact on the vitality of nearby retail centres.
IIA4: Employment & Skills	+	M	D	L	I	P	LT	The site is situated within the Isle of Dogs Activity Area and so there is likely good accessibility to employment opportunities, which is reflected in good levels of employment and income for the area. The finer details of the development are not yet known; however, it is assumed that the site will include some employment space which will provide further jobs for future residents. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
IIA5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to deliver 350 homes, which will contribute somewhat to the borough's housing targets, however it will fall below the threshold. No details are currently available on the level of affordable housing. The provision of sufficient affordable housing is imperative given the significant barriers to housing which exist within the site. Currently, no details are known on the provision of accessible homes.
IIA6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is not considered to be within the most deprived neighbourhoods from a crime perspective. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.
IIA7: Sustainable Transport	-	N/A	N/A	N/A	N/A	N/A	N/A	There is an average provision of public transport at the site, as reflected in a PTAL score between 3-4. The site is in close proximity to bus stops, underground and overground rail

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								links. A section of the London Cycle Network runs to the south of the site. It is not clear whether there will be plans for additional sustainable transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services and will allow residents to live their lives more locally and may reduce the need to travel. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	+/-	M	D	L	R/I	P/T	ST/LT	The site is around 0.8km from the Russia Dock Woodland. There is a potential negative effect on ecology as a result, particularly during construction. The site is also located in close proximity to a number of SINC. Green space is proposed as part of the development which will improve urban greening and provide GI; however, it is unknown whether the site will be in line with BNG targets
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Canary Wharf Area Strategically Important Skyline, and the Canary Wharf Cluster Tall Building Zone. Development will need to provide an appropriate transition in building heights to respect the existing character of the site and avoiding adverse effects on the skyline. Full details of the scale of development is currently unknown. There are likely to be temporary negative effects to the local landscape and townscape setting during construction. Improvements to public realm are currently unknown.
IIA11: Historic Environment	+/-	L	D/I	L	R/I	P/T	ST/LT	The site is situated in the Isle of Dogs APA. The site is also adjacent to the West India Dock Conservation Area and the Narrow Street Conservation Area. Any development of the site will need to protect and enhance the setting of heritage assets, this will depend on the scale, massing, layout and materials that are proposed. However, details on this, and any potential enhancements to public realm are expected to improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site, and there is fairly good access to local public transport. It is unknown whether the site will provide new facilities allowing resident to live their lives more locally and reduce the need for private car usage. There are likely to be temporary negative effects on air quality due to dust generation and emissions from construction.
IIA15: Climate Change & Resilience	+/-	M	D	L	I	P	LT	The site is located in an area which has a medium overall climate risk and heat risk rating. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	+	L	D	L	I	P	LT	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Northquay and Westferry and Park Place.</p> <p>IIA1/2: If construction of this site and the Northquay and Westferry and Park Place sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Northquay and Westferry and Park Place sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Northquay and Westferry and Park Place sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites Northquay and Westferry and Park Place.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Northquay and Westferry and Park Place sites.</p> <p>IIA14: If construction of this site and the Northquay and Westferry and Park Place sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Northquay and Westferry and Park Place sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Northquay and Westferry and Park Place sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Northquay and Westferry and Park Place sites are likely to result in a cumulative increase in waste.</p>							

Site Name	Hertsmere House							
Site Capacity	350							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							

Samuda Estate

Table G-52 – Samuda Estate

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
I/A Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
I/A1: Population & Equalities	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has potential to provide 850 new homes, which will work positively towards achieving the borough's housing target. At this stage, it is not known how many of these units will be accessible and wheelchair adaptable. The ward sits in the most deprived decile; therefore, affordability needs to be a key consideration. The site has good existing access to community services which may help to reduce levels of inequalities by bringing communities closer to these facilities and will support a changing demographic.
I/A2: Human Health	?	N/A	N/A	N/A	N/A	N/A	N/A	As housing is a key determinant of health, the delivery of this is likely to provide health benefits. The site does have good access to healthcare and community facilities, and life expectancy is similar to the national average for both men and women. It is not clear whether the current provision will meet the needs of the new population. There is limited information of the type of housing and the additional provisions the site may make e.g. public realm, employment, health facilities.
I/A3: Economy & Town Centres	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is well located to existing employment areas, as it is in close proximity to the Isle of Dogs activity area. This will likely improve access for residents to employment opportunities. The site is located near to the South Quay neighbourhood centre, and it is imperative that any development does not lead to a negative impact on the centre. The site provides an opportunity to provide mixed use development which would further improve connectivity between business clusters and the housing market, however details of how this could be delivered are not currently apparent.
I/A4: Employment & Skills	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is within close proximity to the Isle of Dogs Activity Area and the South Quay Neighbourhood centre, which are likely to improve access for residents to employment opportunities. The site is currently in the most deprived decile in terms of income and employment, and so it is important to ensure sufficient opportunities for a wide range of jobs is provided to avoid stagnation of the labour market. It is currently unclear as to whether any employment space within the site will be provisioned within redevelopment, affordability of new units may be a key concern. Additionally, construction of the site is likely to result in additional local jobs for residents, as outlined in the Tower Hamlets Planning Obligations Supplementary Planning Document.
I/A5: Housing	?	N/A	N/A	N/A	N/A	N/A	N/A	The provision of 850 new homes will help towards meeting LBTH's housing target. It is assumed that the site will meet the minimum 35% target of affordable homes, however, the size, type and tenure of housing is not currently known.
I/A6: Crime & Safety	?	N/A	N/A	N/A	N/A	N/A	N/A	Most of the site area lies within the 20% most deprived neighbourhoods in terms of crime. There is limited detail on whether designing out crime principles will be applied as part of the development or whether there will be improvements to the public realm, to support crime reductions.

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
IIA7: Sustainable Transport	?	N/A	N/A	N/A	N/A	N/A	N/A	The site has average access to public transport, as reflected in a PTAL score between 2-3, the site is situated within reasonable proximity to bus stops and underground and overground stations. The site is not currently served by active transport links via the National or Local Cycle Network. It is not clear whether there will be plans for additional sustainable or active transport provision.
IIA8: Accessibility	+	M	D	L	I	P	LT	The existing site has good access to facilities and services. However, it is not clear whether additional services will be provided on-site and the current capacity of these facilities. There is potential for essential services to be stretch by a large increase in population. This may conversely increase the need to travel.
IIA9: Biodiversity & Natural Capital	-	L	I	L	R/I	P/T	ST/LT	The site is located adjacent to a mudflat priority habitat to the East. The Mudchute Park Farm Local Nature Reserve is situated less than 0.3km to the South West of the site. There are also a number of SINC's located in close proximity to the site. There is a potential negative effect on ecology as a result, particularly during construction. Currently, there are no details as to whether GI will be included within proposals, and whether the site will be in line with BNG targets.
IIA10: Landscape & Townscape	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be temporary negative effects to the local landscape and townscape setting during construction. At this stage the design details are unknown, however, it is assumed that the development is likely to improve townscape and landscape setting. An area of local space is found west adjacent to the site, and any proposal coming forward will need to be designed with the preservation of the existing built form and density in mind.
IIA11: Historic Environment	?	N/A	N/A	N/A	N/A	N/A	N/A	The site is situated within the Isle of Dogs archaeological priority area. Consideration should be given to ensure there is no impact on the setting of the historic docks and Maritime Greenwich World Heritage Site to the South, the Coldharbour Conservation Area to the North. It is therefore anticipated that the built form will need protect and enhance the setting of heritage assets which will depend on the scale, massing, layout and materials that are proposed. It is unknown whether there will be any enhancements to the public realm which may improve the setting of the local historic environment. During construction there is potential for adverse effects on the setting of neighbouring heritage assets from construction traffic, emissions and noise and vibration. Excavation works required may result in the loss of buried archaeological assets.
IIA12: Flooding	--	H	D	L	I	P	LT	The site is located within flood zone 2 and 3, any flood risk measures are expected to be in line with the borough's Strategic Flood Risk Assessment.
IIA13: Water Quality	-	L	D/I	L	R/I	P/T	MT/LT	The site is located in close proximity to the River Thames, there is potential for increased surface runoff during construction, further polluting this watercourse.
IIA14: Air Quality	+/-	L	D/I	L	R/I	P/T	ST/LT	Air quality is generally good at the site. The site has average access to local public transport and will provide new facilities allowing residents to live their lives more locally and reduce the need for private car usage. However, there will be temporary negative effects on air quality due to dust generation and emissions from construction. There are a number of

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
								existing residential receptors surrounding the site which would be negatively impacted during construction.
IIA15: Climate Change & Resilience	-	H	D	L	I	P	LT	Climate and heat risk at the site is medium/medium-high. The site is also located within an area of flood risk and flood zone 2 and 3. Therefore, it is likely to have diminishing resilience to climate change. At this stage, development specific climate resilience measures are unknown. It is assumed that the site will adhere to the London Plan, Policy G5 – Urban Greening. This will provide opportunities for increased climate resilience at the site.
IIA16: GHG Emissions	?	N/A	N/A	N/A	N/A	N/A	N/A	There are likely to be significant GHG emissions associated with the construction phase from embedded carbon within building materials as well as carbon emissions from construction traffic and construction plant. At this stage, it is not clear whether the development will utilise renewable energy sources or low carbon heat networks once operational. Further design details are required.
IIA17: Waste	?	N/A	N/A	N/A	N/A	N/A	N/A	Demolition, excavation, and construction of the site are likely to result in the generation of a significant amount of waste. At this stage it is not clear if the existing buildings and structures at the site will be re-used or recycled and whether recycled materials will be supported as part of construction.
IIA18: Efficient use of Land	?	N/A	N/A	N/A	N/A	N/A	N/A	The development is located on previously developed land and will support high density housing which will help to make the best use of the site. However, it is not clear whether the site will encourage sustainable use of materials.
Potential Cumulative/ Synergistic Effects	<p>IIA1/2: There is potential for cumulative negative effects on existing services, due to the potential significant increase in population from the delivery of this site in combination with neighbouring sites Limeharbour and Crossharbour.</p> <p>IIA1/2: If construction of this site and the Limeharbour and Crossharbour sites were to happen concurrently, there is potential for a cumulative increase in disturbance to existing local residents.</p> <p>IIA3/4: In combination, this site and the Limeharbour and Crossharbour sites will significantly increase the number of business and jobs.</p> <p>IIA5: In combination, this site and the Limeharbour and Crossharbour sites will significantly increase housing stock.</p> <p>IIA10: There is potential for cumulative negative effects within the Tall Building Zone areas in combination with neighbouring sites Limeharbour and Crossharbour.</p> <p>IIA11: There is potential for cumulative increase in the loss of heritage assets and buried archeology from both this site and the Limeharbour and Crossharbour site.</p> <p>IIA14: If construction of this site and the Limeharbour and Crossharbour sites were to happen concurrently, there is potential for an increased worsening in air pollution from construction plant emissions, dust and construction traffic.</p> <p>IIA15: The increase in GI provided by both this site and the Limeharbour and Crossharbour sites are likely to increase resilience to the UHI effect.</p> <p>IIA16: The construction of both this site and the Crossharbour and Limeharbour sites are likely to result in a significant cumulative increase in embodied carbon.</p> <p>IIA17: Demolition, excavation, and construction of this site and neighbouring site Limeharbour and Crossharbour sites are likely to result in a cumulative increase in waste.</p>							

Site Name	Samuda Estate							
Site Capacity	850							
Site Source	New allocation							
Site Status	New allocation							
IIA Objective	Significance	Magnitude	Nature of effect	Spatial Extent	Reversibility	Permanence	Duration	Description of potential Effects
Mitigation and Enhancement Measures	<p>IIA1/2: Further assessment as part of the scheme level design should incorporate an evaluation of the provision of healthcare and education facilities to ensure the current supply is sufficient in supporting new communities.</p> <p>IIA3/4: Development should make efficient use of space and deliver development in line with Policy EG1 to maximise employment opportunities. To ensure that the development does not have a negative impact on existing town centres, development should be in line with policies protecting town centres TC1-TC8.</p> <p>IIA6: Development should incorporate designing out crime principles identified in Policy PS4.</p> <p>IIA7: Development should prioritise the provision of sustainable transport infrastructure through compliance with policy MC1, and development should be designed in line with the principles as set out in policy MC2 to promote active transport.</p> <p>IIA9: In line with policy BO1, the site must achieve a minimum UGF and BNG targets set out within the Plan (2.5 biodiversity units per hectare or a 30% gain in habitat value for wildlife).</p> <p>IIA10: The application of Policy PS8 will help preserves or enhance visual connections between the public realm and open spaces.</p> <p>IIA11: Development should be in line with policies PS6 and PS7.</p> <p>IIA12/13: The application of policies CG6, CG7 and CG8 will help mitigate flood risk and water quality impacts.</p> <p>IIA14: A Dust Management Plan should be prepared as part of the CEMP. The application of Policy CG9 will help to ensure that measures to improve air quality should be implemented on-site during both construction and operation.</p> <p>IIA15: Development should incorporate design measures which will reduce the effects of climate change to infrastructure, residents and visitors. This could include measures such as zonal heating systems, water saving initiatives and energy monitoring devices.</p> <p>IIA17: A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.</p> <p>IIA17/18: Development should support the use of sustainable sourced and/or recycled materials in line with Policy DV4.</p>							



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London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix H - Equalities Impact Assessment



London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix H - Equalities Impact Assessment

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1 Introduction

1.1 Background and context

- 1.1.1. The London Borough of Tower Hamlets (LBTH) is currently preparing a New Local Plan (NLP), which will replace The Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits adopted in 2020¹. The new Tower Hamlets NLP will comprise five sub-areas, as planning functions for the London Legacy Development Corporation (LLDC) in the north-east of LBTH are expected to be returned to LBTH in 2024. The sub-areas are City Fringe, Central Area, Lower Lea Valley, Isle of Dogs and South Poplar, and Hackney Wick and Fish Island (current LLDC area).
- 1.1.2. An Integrated Impact Assessment (IIA) has been undertaken to ensure that sustainability aspects are incorporated into the NLP. The IIA enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. This process also helps to simplify outcomes and recommendations for policymakers.
- 1.1.3. As part of the IIA, an Equality Impact Assessment (EqIA) has been undertaken to assess from an equality perspective the impacts and likely effects of policies in the NLP on different groups protected by equalities legislation, notably the Equalities Act 2010. It will also seek to identify whether such policy categories might have an adverse impact on equality of opportunity.
- 1.1.4. The outcomes of the EqIA have informed the IIA.

¹ Tower Hamlets Council (2020) Tower Hamlets Local Plan 2031. Available at: https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH_Local_Plan_2031_accessibility_checked.pdf

2 Legislation

- 2.1.1. The Equality Act 2010² came into force on 1 October 2010 and brought together over 116 separate pieces of legislation into a single Act. The Act provides a legal framework to protect the rights of individuals that share defined "protected characteristics" and advance equality of opportunity. In addition, the Act states that, when making decisions, an authority must consider methods to reduce any inequalities which may arise for those from a disadvantaged socio-economic background.
- 2.1.2. Those "protected characteristics" which identify the vulnerable groups who may be disproportionately impacted upon or discriminated against are outlined in **Table 2-1**. Protection extends to those who are perceived to have these characteristics or who suffer discrimination because they are associated with someone who has that characteristic, e.g. cares for someone with a disability.

Table 2-1 – Protected groups listed under the Equality Act 2010

Protected Characteristic	People and Aspects Included
Sex	Men, women, married and single people; parenting, caring, flexible working and equal pay concerns.
Religion or belief	People who have a religious belief; people who are atheist or agnostic; people who have a philosophical belief which affects their view of the world or the way they live.
Age	Children (0-16), young people (17-25), working age people (15-64) and elderly people (65 and over).
Disability	People with physical, mental, sensory, visible or hidden impairment (e.g. cancer, HIV, dyslexia).
Race	People from various ethnic groups, as for the Census categories, e.g. White British, Chinese, British Asians, Travellers, Gypsies, Roma, those who are of Caribbean origin, people of mixed heritage, White Irish communities, and people of other nationalities who reside in Britain.

² The Stationary Office, Equality Act 2010. Available at: http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf (Accessed: 17 January 2022)

Protected Characteristic	People and Aspects Included
Sexual orientation	Heterosexual and bisexual men and women, gay men and lesbians.
Gender reassignment (transgender)	Anyone who is proposing to undergo, is undergoing or has undergone a process for the purpose of reassigning their sex. This applies to anyone at any stage in the transition process, from proposing to reassign their sex, undergoing a process of reassignment, or having fully transitioned.
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby - protection against maternity discrimination (including as a result of breast feeding).
Marriage and civil partnership	People who are married or are civil partners.
Deprivation *	People at risk of socio-economic disadvantage. This also includes young people leaving the system.

** Although it is not included as a protected characteristic within the Equality Act 2010, deprivation has been included in the assessment as the Act also requires due regard to reducing the inequalities of outcome which result from socio-economic disadvantage.*

3 Equality Impact Assessment

3.1 What is EqIA?

- 3.1.1. An EqIA considers the impact of a project or policy on persons or groups of persons who share characteristics which are protected under section 4 of the Equality Act 2010 ("protected characteristics") and might also include others considered to be vulnerable within society such as low-income groups. It is an information gathering tool which enables decision makers within public bodies to implement their equality duty under the Equality Act 2010.
- 3.1.2. An EqIA guides decision makers and designers to:
- Consider the effects of existing and proposed policy or practice on people who share a "protected characteristic"; and
 - Identify opportunities to improve equality of opportunity and eliminate discrimination.
- 3.1.3. An EqIA should be carried out before making decisions, to inform and shape the outcomes. They should be updated throughout the decision-making process as necessary, as policy or practices are developed.
- 3.1.4. There are three stages to an EqIA: screening, full assessment and outcome monitoring. The screening stage determines which protected characteristics are likely to experience disproportionate impacts, and therefore require consideration within the EqIA. This considers the nature of the public function being exercised and available information on users and impacts. This document represents the assessment on those groups identified.

4 Social Profile

4.1 Introduction

- 4.1.1. A social profile for LBTH has been compiled from publicly available data to provide context for the assessment. This comprises information on the following:
- Protected characteristic groups;
 - Local communities; and
 - Sensitive receptors, local community facilities and public transport.

4.2 Local Community and Facilities

LBTH Community and Character

- 4.2.1. LBTH is an East London borough, comprising much of the 'traditional' East End. It was formed in 1965 from the merger of the former metropolitan boroughs of Stepney, Poplar, and Bethnal Green, named after the historic Tower Division. The borough now contains much of the regenerated London docklands area.
- 4.2.2. LBTH is a world-class hub for financial, professional, and technical sectors, and is home to London's financial district, Canary Wharf. The boroughs total economic output is higher than any of the core UK cities outside of London at £29.7b.
- 4.2.3. All new development must drive up the quality of design, constructed to the highest safety standards and improve the Borough's built environment and liveability.

LBTH Local Community Facilities

- Homes:
 - The Office for National Statistics (ONS) reports that the median price paid for homes at the end of December 2022 was £500k³.
 - As of 2022 the median house price in the borough was ten times the median income level⁴.
 - In 2019 there were 19,826 households on the Tower Hamlets housing register. This is the third highest waiting list in London after Newham and Lambeth, and the eighth highest nationally⁵.
- Businesses:

³ [Median house prices for administrative geographies: HPSSA dataset 9 - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

⁴ [House price to workplace-based earnings ratio](#)

⁵ [Housing Borough profile \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)

- There are 17,000 businesses across the entire borough; and
- 278,000 jobs are generated by their presence⁶.
- Social infrastructure:
 - The Borough has three NHS hospitals; and
 - There are 60 nursery schools, 69 primary schools, 18 secondary schools, 13 sixth form colleges and six special schools.

Key Borough Concerns

4.2.4. LBTH Strategic Plan 2022-2026 highlights eight key priorities for the borough. These consist of:

- Tackling the cost-of-living crisis;
- Providing homes for the future;
- Accelerating education;
- Boosting culture, business, jobs, and leisure;
- Investing in public services;
- Empowering communities and fighting crime;
- Working towards a clean and green future; and
- A council that listens and works for everyone.

4.3 Protected Characteristics Profile

4.3.1. Data from the Office of National Statistics (ONS) has been gathered on the following protected characteristics from Section 4 of the Equality Act 2010:

- Sex;
- Religion;
- Age;
- Disability;
- Race;
- Sexual orientation;
- Pregnancy and maternity;
- Marriage and civil Partnership; and
- Gender reassignment.

4.3.2. Although not a protected characteristic under the Equality Act 2010, the social profile also includes data on deprivation as it provides a measure of a combination of social-economic metrics.

⁶ Tackling the housing crisis https://www.towerhamlets.gov.uk/lgnl/housing/Tackling_the_housing_crisis.aspx

4.3.3. It should be noted that the last Census was taken in 2021. Where there may be some datasets that are not yet available data has been substituted with 2011 census data and other more recent information.

4.4 Sex

4.4.1. The total population Tower Hamlets was recorded in 2021⁷ as 310,300 people. Within the Borough, approximately 50.2 % of the population were recorded as male and 49.8% as female, which is discordant with the wider London population of 48.5% male and 51.5% female. The percentage of the population who are male in the LBTH area is slightly higher than the national average, and the percentage of the population who are female is slightly lower, as shown in **Table 4-1**. Table 4-1 – Sex Profile 2021⁷

Sex	Tower Hamlets	%	London	%	Great Britain	%
All people	310,300		8,796,600		65,121,700	
Male	155,770	50.2%	4,267,500	48.5%	31,874,600	48.9%
Female	154,530	49.8%	4,529,100	51.5%	33,247,100	51.1%

4.5 Religion

4.5.1. As stated in the 2021 Census, of those in LBTH who identify with a religion, the largest group identify as Muslim (39.9%), which is discordant with the national trend. The second largest proportion of the population identify as having no religion (26.6%) as shown in **Table 4-2**.

Table 4-2 – Religion Profile 2021⁷

Religion	Tower Hamlets		England %
	Number in 2021	% Total pop in 2021	
Christian	69,223	22.3	46.3
Buddhist	2,961	1.0	0.5

⁷ <https://www.nomisweb.co.uk/reports/lmp/la/1946157252/report.aspx>

Religion	Tower Hamlets		England %
	Number in 2021	% Total pop in 2021	
Hindu	6,298	2.0	1.8
Jewish	1,341	0.4	0.5
Muslim	123,912	39.9	6.7
Sikh	966	0.3	0.9
Other religion	1,652	0.5	0.6
No religion	82,635	26.6	36.7
Religion not stated	21,318	6.9	6.0

4.6 Age

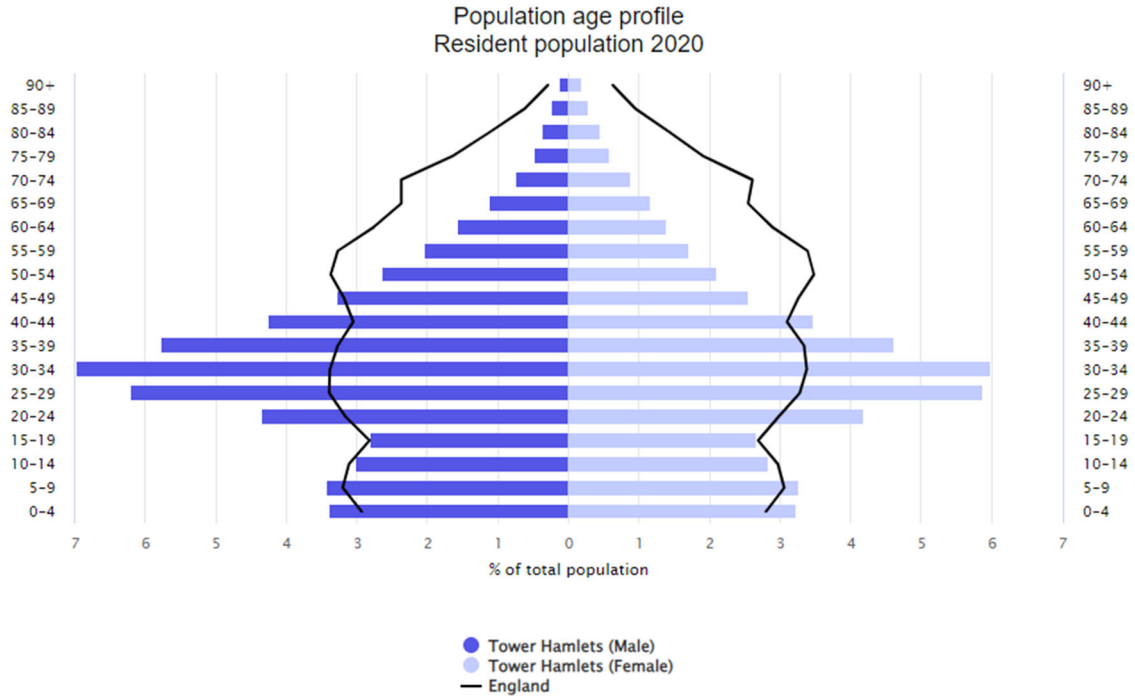
- 4.6.1. As of 2021, the median age in LBTH was 30 years of age, making Tower Hamlets the youngest borough by median age in England and Wales. In accordance with this, 52.9% of the population are aged 16-34.
- 4.6.2. The 2019 Local Authority Health Profiles data on population age shows that Tower Hamlets has a largely differing age structure to England across all age categories (**Table 4-3**). The age category with the greatest difference is 25 to 34 years old, which is 9.5% higher than the average for London and 13.9% higher than England.

4.6.3. Figure 4-1 shows the population pyramid of the LBTH area population in 2020, which is the latest available population profile graphic. Although the data is slightly different to the 2021 data presented in Table 4-3 it still illustrates the general trends.

Table 4-3 – Age Profile 2021⁷

Age	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Aged 4 years and under	19,090	6.2	6.0	5.4
Aged 5 to 9 years	17,658	5.7	6.0	5.9
Aged 10 to 15 years	20,675	6.7	7.2	7.2
Aged 16 to 19 years	15,085	4.9	4.4	4.6
Aged 20 to 24 years	31,988	10.3	6.7	6.0
Aged 25 to 34 years	85,181	27.5	18.1	13.6
Aged 35 to 49 years	69,956	22.5	22.7	19.4
Aged 50 to 64 years	33,199	10.7	16.9	19.4
Aged 65 to 74 years	10,379	3.3	6.5	9.8
Aged 75 to 84 years	5,024	1.6	3.8	6.1
Aged 85 years and over	2,068	0.7	1.6	2.4

Figure 4-1 - Population age profile of the LBTH area in 2020⁸



Projected Population

- 4.6.4. Between the last two censuses (held in 2011 and 2021), the population of Tower Hamlets increased by 22.1%, from around 254,100 in 2011 to around 310,300 in 2021. This means the borough’s population saw the largest percentage increase in England. The population of London increased by 7.7%, while the population of England rose by 6.6%⁹.
- 4.6.5. The total population in the LBTH area is set to increase across most age groups by 2043, with an overall increase of 18.3%¹⁰. This projection is higher than the national trend of an expected 7.3% growth. The age group set to experience the biggest growth in this

⁸ Local Authority Health Profiles (2020) Available at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/12/gid/1938132696/pat/6/par/E12000007/ati/202/are/E09000020/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1> This is the latest age profile graphic available.

⁹ ONS, Census 2021, How life has changed in Tower Hamlets: Census 2021, 2023. [online] available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E09000030>

¹⁰ ONS. 2018. 2018-Based Subnational Population Projections for Local Authorities and Higher Administrative Areas in England. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/dataset/localauthoritiesinenglandtable2> (Accessed 19/01/2022)



timeframe is 75-79 group at 177.6 %. Age groups anticipated to experience decline are 5–9-year-olds (-2.6%), the 10-14 year olds (-2.6%), 35-39 year olds (-7.1%) and the 40-44 year olds (-6.5%). Further detail has been provided in Table 4-4 below. Table 4-4 – Population Projections 2023-2043¹⁰

Age Group	2023	2043	% Increase from 2023-2043
0-4	21,530	23,237	4.6%
5-9	22,170	21,592	2.5%
10-14	21,747	21,178	17.7%
15-19	20,228	22,629	35.2%
20-24	28,853	32,852	18.7%
25-29	40,585	45,059	9.7%
30-34	40,950	43,795	0.3%
35-39	35,693	33,144	2.1%
40-44	28,269	26,426	14.3%
45-49	21,730	25,004	42.2%
50-54	17,433	23,999	69.5%
55-59	14,153	23,111	107.6%
60-64	10,901	20,146	126.2%
65-69	8,621	16,028	137.8%
70-74	6,258	12,713	175.0%
75-79	4,139	9,609	177.6%
80-84	2,769	6,376	143.3%
85-89	1,764	3,686	124.0%
90+	1,012	1,989	136.5%
All ages	348,804	412,571	29.9%

4.7 Disability

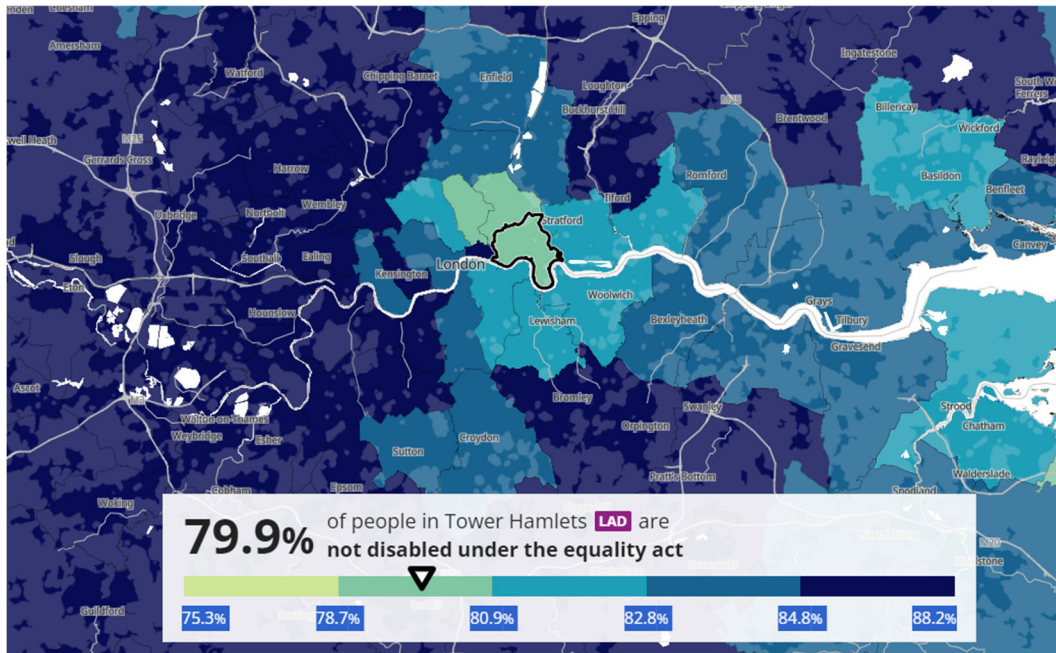
4.7.1. The social model of disability states that people are disabled by barriers in society, not by their impairment or difference. Barriers can be physical, like buildings not having accessible toilets. Or they can be caused by people's attitudes to difference, like assuming disabled people can't do certain things¹¹. **Table 4-5** shows the proportion of the population whose day-to-day activities are limited by a long-term health problem or disability in comparison to those that are not. The proportion of the population of LBTH who are limited in their day-to-day activities is representative of the regional average, at 13% and 13.2% respectively. The national average is slightly higher with 17.3% of the population experiencing some degree of limitation⁷.

Table 4-5 – Proportion of those living with limiting health problems or disability 2021⁷

Day to Day activities	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Limited a Lot	17,599	5.7	5.7	7.3
Limited a little	22,526	7.3	7.5	10.0
Not limited	14,091	4.5	5.2	6.8
No long-term physical or mental health conditions	256,090	82.5	81.5	75.9

¹¹ Social model of disability. Scope [online] available at: <https://www.scope.org.uk/about-us/social-model-of-disability/>

Figure 4-2 - Proportion of the LBTH population classified as disabled under the equality act in comparison to neighbouring boroughs¹².



- 4.7.2. **Figure 4-2** demonstrates the raised proportion of the LBTH population living with disability in comparison to neighbouring boroughs. 79.9% of the Tower Hamlets population live without disability, compared to 82.5% in Newham, and 85.5% in Redbridge.
- 4.7.3. Caring, as defined by the census question, refers to giving unpaid help to someone requiring help due to a health condition or disability or because of old age. 6.4% of LBTH residents aged 5 and over were defined as care providers in 2021. This figure is lower than the London average at 7.3%.
- 4.7.4. As of March 2023, there is an estimated 4,850 (1.4 %) people living with sight loss in the LBTH area. This includes around 3,180 (65.5%) people living with mild sight loss, 1,110 (22.8%) people living with moderate sight loss and 560 (11.5%) people living with severe sight loss. By 2032 there are expected to be 6,520 people in Tower Hamlets living with sight loss, an estimated increase of 34% over the next decade¹³.

¹² Census Maps (2021) <https://www.ons.gov.uk/census/maps/choropleth/health/disability-age-standardised/disability-4a/not-disabled-under-the-equality-act?lta=E06000023&lbd=E09000030> (Accessed: 05/09/2023)

¹³ RNIB Sight Loss Data Tool - statistics on sight loss | RNIB | RNIB

Table 4-6 – Age profile of those living with sight loss 2021¹³

Age	Tower Hamlets		England %
	Number in 2021 living with sight loss	% of Total in 2021 living with sight loss	
0-17	0	23	23
18-49	205	60	49
50-64	150	11	17
65-74	100	4	7
75+	305	3	6

4.7.5. As of 2019, it was estimated that 24,500 (7.9%) people in LBTH suffered from hearing loss¹⁴. NHS projections estimate an increase in those suffering from hearing loss of 5.1% by 2035, totalling a hearing loss prevalence of 13%, which is less than both the regional and national predictions of 19% and 25% prevalence respectively¹⁵.

4.8 Race

4.8.1. The 2021 Census data indicates that the majority of the population in the LBTH area is Asian, Asian British or Asian Welsh (44.4%). This group is represented at a percentage of 23.7% higher than the regional average and 34.8% higher than the national average respectively⁷. The largest sub group within this category is Bangladeshi, who make up 34.6% of the population.

¹⁴ [NHS England » Prevalence of hearing loss by CCG area \(2019 ONS predictions\)](#)

¹⁵ [NHS England » Hearing Loss Data Tool](#)

Table 4-7 – Ethnicity Profile⁷

Ethnic Group	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Asian, Asian British or Asian Welsh	137,856	44.4	20.7	9.6
Black, Black British, Black Welsh, Caribbean or African	22,693	7.3	13.5	4.2
Mixed or Multiple ethnic groups	15,409	5.0	5.7	3.0
White	122,266	39.4	53.8	81.0
Other ethnic group	12,082	3.9	6.3	2.2

4.9 Sexual Orientation

- 4.9.1. In LBTH the vast majority of the population identified as heterosexual at 83.1%. This is marginally lower than the regional and national average of 86.2% and 89.4% respectively. The proportion of the population that identify as gay or lesbian in LBTH is 2.2% higher than the London figure and 2.5% higher than the national figure. Bisexual identification follows a similar pattern in that the proportion is higher in LBTH than it is London and England⁷.
- 4.9.2. Taken together this means that 7.2% of residents identified as part of the LGBTQIA+¹⁶ community. This is significantly higher than the proportions of 4.2% in London and 3.1% in England and Wales¹⁷.

¹⁶ lesbian, gay, bisexual, transgender, queer, questioning, intersex, or asexual

¹⁷ Tower Hamlets, 2021 Census Findings, 2023 [online] available at:

https://www.towerhamlets.gov.uk/Documents/Borough_statistics/Census-2021/2021-Census-key-finding.pptx#:~:text=Overall%20borough%20population,of%20Tower%20Hamlets%20was%20310%2C300.

Table 4-8 – Sexual Orientation Profile 2021⁷

Sexual Orientation	Tower Hamlets		London %	England %
	Number in 2021	% in 2021		
Straight or Heterosexual	210,070	83.1	86.2	89.4
Gay or Lesbian	10,021	4.0	2.2	1.5
Bisexual	6,376	2.5	1.5	1.3
Pansexual	1,161	0.5	0.4	0.2
Asexual	155	0.1	0.0	0.1
Queer	324	0.1	0.1	0.0
All other sexual orientations	90	0.0	0.0	0.0
Not answered	24,688	9.8	9.5	7.5

4.10 Pregnancy and Maternity

- 4.10.1. A maternity is a pregnancy resulting in the birth of one or more children, including stillbirths. In 2016 the maternity rate in the LBTH area was 53.1 (maternities per 1,000 women aged 15 to 44), lower than the maternity rates for London and England, of 62.8 and 61.8 respectively¹⁸. The greatest amount of live births in the LBTH area are from women in the age category 30-34, which is in line with London and England. Births in the under eighteen age group are less prevalent in LBTH than they are in London and England, with only 0.1% of all live births being to mothers aged eighteen and under compared to 0.4% and 0.8% respectively. Table 4-9 shows Live Births by Age of Mother for LBTH, London and England.
- 4.10.2. In the LBTH area 34.7% of all live births occur outside of marriage or civil partnership. This is a lower proportion than the regional and national averages by 1.7% and 12.2% respectively. This indicates that more live births in the LBTH area occur within marriage or civil partnership than outside of it.

¹⁸ ONS (2016) Live births in the UK by area of usual residence of mother. Available at : <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/birthsbyareaofusualresidenceofmotheruk> (Accessed 20/01/2022)

Table 4-9 – Live Births by Age of Mother 2016¹⁸

Age of Mother at Birth	Tower Hamlets		London %	England %
	Number in 2016	% of Total live births in 2016		
Under 18	6	0.1	0.4	0.8
Under 20	63	1.4	1.8	3.2
20 to 24	448	9.8	9.9	14.6
25 to 29	1,285	28.0	23.6	28.0
30 to 34	1,643	35.8	34.9	31.8
35 to 39	922	20.1	23.4	18.1
40 to 44	211	4.6	5.7	4.0
45 and over	20	0.4	0.6	0.3
Total Live Births (Number in 2016)	4,592		128,803	663,157
Total Fertility Rate Total Live Births (Number in 2016)	1.39		1.72	1.81

4.11 Marriage and Civil Partnership

4.11.1. The percentage of the population which is married or in civil partnership in LBTH is 8% lower than the regional average and 12.7% lower than the national average. In line with this the proportion of the population who are divorced is also lower than the regional and national average by 1.5% and 4.1% respectively.

Table 4-10 – Marriage and Civil Partnership Profile 2021⁷

Marriage / Civil Partnership	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Never married and never registered a civil partnership	147,392	58.3	46.2	37.9
Married or in a registered civil partnership	80,955	32.0	40.0	44.7
Separated, but still legally married or still legally in a civil partnership	5,013	2.0	2.3	2.2
Divorced or civil partnership dissolved	12,738	5.0	7.3	9.1
Widowed or surviving civil partnership partner	6,787	2.7	4.2	6.1

4.12 Unemployment and Deprivation

4.12.1. There is a smaller proportion of economically active population in LBTH than in the wider London region and the UK. The proportion of unemployment in LBTH is also marginally higher than the national average by 1%.

Table 4-11 – Employment status in LBTH, London and England

Employment and Unemployment	Tower Hamlets		London %	England %
	Number in 2021	% Total pop in 2021		
Economically active	190,300	76.6	79.8	78.5
In employment	180,900	72.8	76.2	75.6
Unemployed	8,700	4.6	4.4	3.6

4.12.2. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small neighbourhoods in England. IMD is used by local governments to focus programmes in the most deprived areas and develop strategies, such as the NLPR. IMD measures deprivation in small areas / neighbourhoods called Lower Super Output Areas (LSOAs). There 32,844 LSOAs in England.

4.12.3. In the LBTH area, there are 144 LSOAs. In 2019 of the 144 LSOAs¹⁹:

- Two LSOAs are within the top 10% most deprived neighbourhoods;
- 84 LSOAs are within the 20-30% most deprived neighbourhoods;
- 35 LSOA's are within the 40-50% of most deprived neighbourhoods;
- 14 LSOA's are within the 40-50% least deprived neighbourhoods;
- Eight LSOA's are within the 30-20% least deprived neighbourhoods; and
- One LSOA's in LBTH are within the 10% least deprived neighbourhoods.

4.12.4. The most deprived LSOAs in the LBTH area are located in the north of the borough and consist of the wards Lansbury, St. Peter's and Stepney green.

4.12.5. The least deprived LSOAs in the LBTH area are located in the south of the borough and consist of the wards Island Gardens, Canary Wharf and St Katherine's and Wapping.

4.12.6. As of 2013, 32,220 of the total population of LBTH were recipients of both housing benefits and council tax benefits. This is a relatively high proportion of the population in comparison

¹⁹ Indices of Deprivation (2019) Indices of Deprivation: 2015 and 2019- Open Data Blog [online] Available at: http://dclgapps.communities.gov.uk/imd/iod_inex.html (Accessed 25/01/2022)

to alternative London boroughs. For neighbouring borough Newham, only 30,740 residents were in receipt of these benefits²⁰.

4.13 Gender Reassignment

4.13.1. Trans is a general term for people whose gender is different from the gender assigned to them at birth. According to 2021 Census data, only 1% of the LBTH population have a gender identity different from their sex registered at birth. Neighbouring boroughs have similar figures of 1.07% for Hackney and 1.51% for Newham. Outside of the London area these figures are even lower, predominantly <1%.

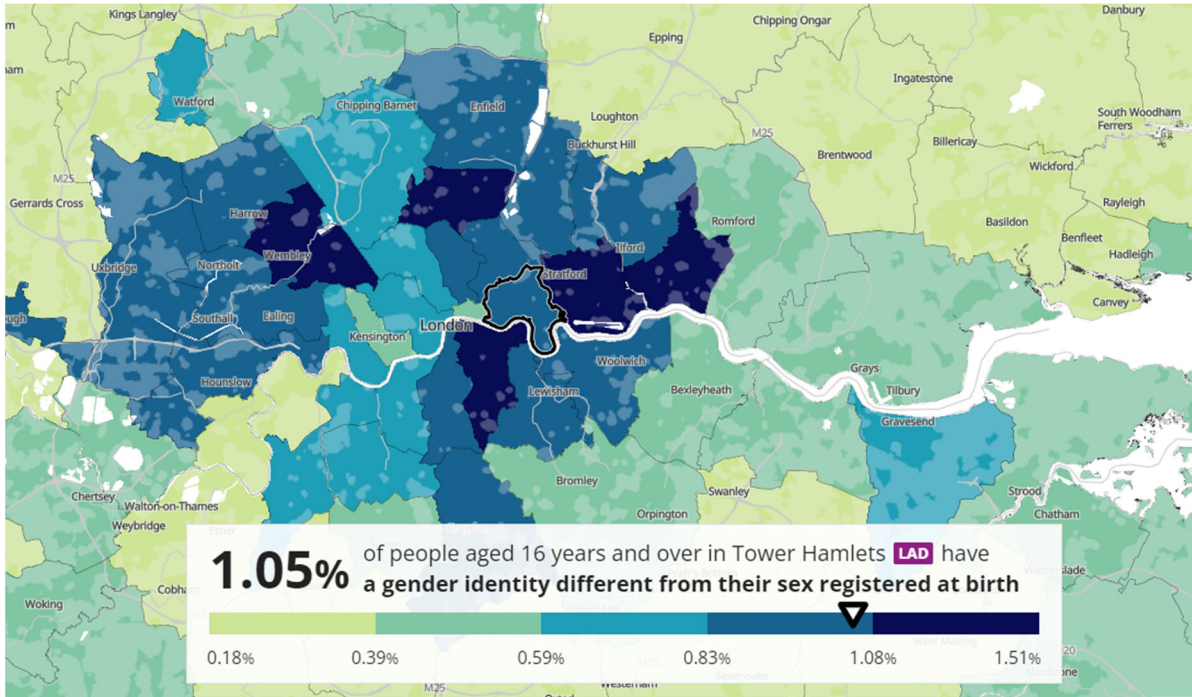
Table 4-12 – Gender Identity in Tower Hamlets and London

Gender Identity	Tower Hamlets	Tower Hamlets %	London	London %
Gender identity the same as sex registered at birth	229,263	90.7	6,479,664	91.2
Gender identity different from sex registered at birth but no specific identity given	1,438	0.6	32,753	0.5
Trans Woman	344	0.1	11,266	0.2
Trans Man	350	0.1	11,480	0.2
Non-binary	350	0.1	5,407	0.1
All other gender identities	161	0.06		0.05

4.13.2. **Figure 4-3** displays a comparison of gender identity across neighbouring London boroughs as well as the wider regional area.

²⁰ Housing Benefit and Council Tax Benefit (2013) <https://www.gov.uk/government/statistics/housing-benefit-and-council-tax-benefit-caseload-statistics-published-from-november-2008-to-present> (Accessed: 05/09/2023)

Figure 4-3 - Portion of the LBTH population with a gender identity different from their sex registered at birth²¹.



²¹ Census Maps (2021) <https://www.ons.gov.uk/census/maps/choropleth/identity/gender-identity/gender-identity-4a/gender-identity-different-from-sex-registered-at-birth?lta=E06000023&lads=E09000030> (Accessed: 05/09/2023)

4.14 Baseline Summary

- As of 2021, LBTH have a population of 310,300, with 50.2% being male and 49.8% being female.
- LBTH is considered a relatively youthful borough with 52.9% of the population being aged 16-34.
- The total population in the LBTH area is set to increase across all age groups between 2018 and 2043, with an overall increase of 0.3%
- Under the Equality Act, 20.1% of the population of LBTH are considered to be disabled. Of this, 5.7% are considered to be limited a lot in engaging with day-to-day activities by their disability.
- The largest ethnic group represented in the borough is Asian, Asian British or Asian Welsh at 44.4% of the total population. Within this, the Bangladeshi community are the largest sub group, making up 34.6%.
- The majority of the population in LBTH identify as heterosexual. 4.% reported being gay or lesbian, and 2.5% bisexual.
- The greatest amount of live births in the LBTH area are from women in the age category 30-34, which is in line with London and England.
- The percentage of the population which is married or in civil partnership in LBTH is 8% lower than the regional average and 12.7% lower than the national average.
- 76.6% of the total population in LBTH were classed as economically active compared to 4.6% who were unemployed in 2021.
- Two LSOAs in LBTH fall within the top 10% most deprived neighbourhoods in the UK. These are Lansbury and St. Peter's.
- According to 2021 Census data, only 1% of the LBTH population have a gender identity different from their sex registered at birth.
- As detailed schemes and interventions come forward framed by the New Local Plan, these should be assessed in more detail to understand the potential impacts on specific local populations and vulnerable groups.

5 Impact Assessment

5.1 Introduction

5.1.1. The New Local Plan sets out the vision for future development in the Borough over a 20-year period and includes the planning policies to help achieve this vision. It can do so by identifying locations that are suitable for good growth as well as for conservation and by setting clear guidelines for appropriate land uses, the form and design of development. The aim is to achieve good accessible placemaking that protects and improves resident's health and well-being, provides good quality homes, enhancing the economy and the environment.

Policies

5.1.2. The following proposed policies have been assessed from an equality perspective.

5.1.3. Policies have been split by their themes under the following categories:

- Delivering the Local Plan;
- Homes for the Community;
- Clean Green Future;
- People, Places and Spaces;
- Inclusive Economy and Good Growth;
- Town Centres;
- Community Infrastructure;
- Biodiversity and Open Space;
- Movement and Connectivity; and
- Reuse, Recycling and Waste.

5.2 Assessment methodology

5.2.1. The impact assessment will assess the proposed policies, based on their potential to directly or indirectly cause likely disproportionate impacts on people with the protected characteristics outlined previously. Impacts have also been considered with impact on those with levels of deprivation, as an indicator of socio-economic disadvantage.

5.2.2. Impacts on protected characteristic groups in particular are identified as positive, neutral or negative. Mitigation or recommendations are provided for each policy where this is applicable. Where the impact is deemed positive or neutral, any recommendations will outline how to ensure there is no negative impact or opportunities to further advance equality and inclusivity.

5.2.3. **Table 5-1** below provides the assessment key to the assessment **Table 5-2** below.

Table 5-1 – Assessment Key

Symbol	Impact
+	Positive
0	Neutral
-	Negative

5.3 Assessment Summary

- 5.3.1. Overall, the policies will likely result in positive impacts on protected characteristic group members in the Borough. The policies aim to address a wide range of issues, identified by the key themes above. An overall neutral impact has been given where positive impacts will affect the general public equally and not specifically those from protected characteristic groups.
- 5.3.2. The main protected characteristic groups that will particularly benefit include:
- Age – older people who have reduced mobility and require access to health and other services. Also, children who are likely to benefit from air quality improvements that numerous policies look to achieve;
 - Disability – people with a variety of disabilities will benefit from a more accessible environment; and
 - Deprivation – people from low-incomes who require access to employment, education and housing and people with underlying health issues.
 - Sex, Gender reassignment and Race – women and girls, gender diverse people, and people from a range of different diverse backgrounds will benefit from inclusive design, creation of safer and inclusive spaces and greater community engagement.
- 5.3.3. Some protected characteristics may be disproportionately adversely affected by the proposed policies. These include:
- Age, Disability and Pregnancy and maternity – The inclusion of public realm improvements and subsequent street furniture, addition of EV charging points and reduction in car parking and motorised vehicles could act as an obstacle to these groups.
 - Deprivation – Low income groups may be disproportionately affected by the development of large-scale purpose-built shared living as it has the potential to compromise the generation of affordable housing throughout the borough. Additionally, there is potential for low levels of engagement from the community in which estate regeneration schemes are proposed.

5.3.4. The assessment concludes that there will likely be a neutral impact for the following protected characteristic groups, assuming no unforeseen barriers emerge:

- Religion or belief;
- Sexual orientation; and
- Marriage and civil partnerships.

Table 5-2 – Summary of Policies and Equality Effects

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
Delivering the Local Plan													
DV1 Areas of growth and opportunity within Tower Hamlets	0	0	0	0	0	0	0	0	0	0	0	+ Development will be focussed in highly accessible locations with good links to public transport, cycling and walking networks and town centres. New and improved facilities will likely be accessible and therefore beneficial to all borough residents.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV2 Delivering sustainable growth in Tower Hamlets	0	0	0	+	0	+	0	0	0	0	0	+ Development will be sustainability conscious and considerate of the council's goal of becoming a carbon neutral borough in 2045. Reduced GHG emissions associated with this goal will be beneficial to the respiratory health of the population. <u>Age, Disability</u> + Improvements to air quality and subsequent positive effects on respiratory health will be predominantly beneficial for the elderly, the young and disabled groups in the borough.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV3 Healthy communities	+	0	0	+	0	+	+	0	+	+	+	+ Development will be conscious of potential beneficial or adverse impacts on the population's health. Physical and mental wellbeing of the borough will likely be ensured this way. <u>Age, Disability</u> + Developments will include built and natural environments that are accessible. This will benefit the elderly and disabled groups with accessing open space as well as the public realm. <u>Gender</u>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>+ Improvements to built and natural environments will meet the needs of different genders, this will benefit both male and females within the borough.</p> <p><u>Deprivation, Race, Pregnancy and Maternity</u></p> <p>+ Improving high quality open spaces and community facilities will provide access to those who may currently be without access to these facilities.</p> <p>+ High quality open space and community facilities will improve opportunities for social interaction.</p>	
DV4 Planning and construction of new development	0	0	0	-	0	-	-	0	0	-	- High levels of development are set to occur in already densely inhabited areas of the borough. While the policy aims to ensure development will have minimal impact on the local environment and communities, it is likely that ongoing construction will have adverse effects on nearby residential receptors through noise and dust pollution.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV5 Developer contributions	0	0	0	0	0	0	0	0	0	0	Additional funds to the improvement of the environment and infrastructure in the borough will ensure sustainable development as set out in the Local Plan is being realised. This policy will therefore be beneficial to all members of the community in the borough.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV6 Promoting social value	+	+	0	0	+	0	0	0	+	+	<p>+ Added social value from development will bring additional community, culture and diversity benefits.</p> <p>+ Religion/ belief and Race</p> <p>Development will support social inclusion and equal opportunity within the borough which will positively impact community cohesion.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
DV7 Utilities and digital connectivity	0	0	0	+	0	+	0	0	0	0	<p>Improvements to utility infrastructure for new developments will be beneficial to all borough residents.</p> <p><u>Age</u></p> <p>+ Improved broadband connections will be beneficial to elderly people suffering from social isolation. Greater opportunities to connect with family and friends virtually will generate positive mental health impacts. Faster broadband will also be beneficial for young people especially students who require the utility for university work.</p> <p><u>Age, Disability</u></p> <p>+ Enhanced efficiency of utilities such as heating and water will bring positive health impacts for vulnerable groups including the elderly and disabled.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
DV8 Site allocations	0	0	0	0	0	0	0	0	0	0	<p>The application of all Local Plan polices on site allocations containing development proposals will be beneficial to all groups in the borough.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
Homes for the Community												
HF1 Meeting housing needs	+/-	0	0	+	0	+	+	0	+/-	+/-	<p><u>Age, Deprivation, Disability</u></p> <p>The policies intention to meet the housing needs of the borough through ways that ensure the creation of mixed, inclusive and balanced communities will be beneficial to the general population. This will benefit those on lower incomes through provision of more housing, which will reduce competition in the housing market. Additionally there will be more availability</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>of social and affordable housing for those on lower incomes.</p> <p>Additionally, ensuring a mix of development size will ensure there is appropriately sized development for different occupier groups, who may need more or less space depending on their needs.</p> <p><u>Race</u></p> <p>The prioritisation of proposals for gypsy and traveller communities will benefit these communities.</p> <p><u>Deprivation, Gender and Race</u></p> <p>-There is potential for low levels of engagement from the community in which estate regeneration schemes are proposed. Areas in need of social housing are where factors such as low incomes and educational barriers and additional pressures such as second jobs and single-parent households are more common. Residents may be less inclined or able to engage with consultation due to pressure from other aspects of life. There could be various other reasons for low engagement, such as language barriers or physical and informational inaccessibility.</p>	
HF2 Affordable housing and housing mix	0	0	0	0	0	0	0	0	0	+	<p><u>Deprivation</u></p> <p>+ The policies target to maximise the delivery of affordable housing with a target of 50% of all new homes to be genuinely affordable will be beneficial to low-income groups who are unable to afford predominant housing availability throughout the borough. The emphasis on affordable family sized housing with a view to combat overcrowding in the borough is also beneficial to families with children.</p>	No mitigation measures have been outlined for this policy. .

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
HF3 Protection of existing housing	0	0	0	0	0	0	0	0	0	0	0	The policies intention to protect existing and safeguard the future supply of self-contained homes across the borough will be beneficial to the general population.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
HF4 Supported and specialist housing	0	0	0	+	0	+	0	0	0	0	0	The provision of specialist housing to offer supported living to those with additional needs will support a range of protected characteristics in the borough. The policy supports those who are homeless through the provision of shelters and transitional housing and older people through provision of nursing homes and care homes. Supported living will benefit these groups by ensuring their care and protection.	No mitigation measures have been outlined for this policy.
HF5 Gypsy and traveller accommodation	0	0	0	0	0	0	0	0	+	0	0	Gypsies and travellers are considered under this theme through safeguarding of the existing gypsy and traveller site at Old Willow Close. This population group will benefit from additional safety measures to their place of occupancy.	Should any additional accommodation be required as a result of improvements to the existing site the council will need to consider appropriate locations for this to avoid illegal sitings. LBTH are currently awaiting the outcomes of the Greater London Authorities Gypsy and Traveller Accommodation Needs Assessment
HF6 Purpose-built student accommodation	0	0	0	+	0	+	0	0	0	0	0	<u>Age</u> + The policy supports the development of student accommodation in close proximity to its relevant higher education institution, and where it does not be detrimental to the cohesiveness of communities. This will be particularly beneficial to the student population in the borough as well as the long-term state of higher education and local economy in the borough.	Accommodation such as student accommodation can be conducive to noise pollution. Accommodation should be appropriately located so as to minimise adverse effects on other residential receptors.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p><u>Disability</u></p> <p>+ It is also noted that 10% of rooms should be designed to be accessible, in line with the London Plan 2021.</p> <p>- An increased prevalence of student accommodation will likely result in increased noise pollution in the surrounding area. This will have adverse effects for the wellbeing of all residents</p>	
HF7 Large-scale purpose-built shared living	0	0	0	+	0	0	0	0	0	-	<p><u>Age</u></p> <p>+ There are benefits to those occupying communal residences, particularly older people living on their own, in terms of reduction of social isolation and increased participation in activities which in turn has health benefits.</p> <p><u>Deprivation</u></p> <p>- The development of large-scale purpose-built shared living has the potential to compromise the generation of affordable housing throughout the borough. This will be disadvantageous to lower income groups who rely on the provision of affordable housing for their residential needs.</p>	Large-scale buildings often have potential to infringe on the residential amenity of an area. Mitigation measures should be put in place to ensure the built environment does not have adverse effects for any population group. Large-scale buildings must also contain accessibility features in order for those who are disabled or with mobility impairments to successfully reside here.
HF8 Housing with shared facilities (houses in multiple occupation)	0	0	0	+	0	0	0	0	0	+	<p><u>Age</u></p> <p>+ HMOs are a beneficial tenancy options for younger residents who are unable to or choose not to live in traditional housing.</p> <p><u>Deprivation</u></p> <p>+ HMOs also offer a shared room rate housing benefit. This is especially beneficial to low-income groups who are reliant on affordable means of housing.</p>	No mitigation measures have been outlined for this policy.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
HF9 Housing Standards and Quality	0	0	0	+	0	+	+	0	0	+	<p><u>Age, Disability, Pregnancy and Maternity, Deprivation</u></p> <p>+ Safe living conditions may be of particular importance to older people, disabled people and expectant mothers who inherently experience raised wellbeing requirements. Those on lower incomes are more likely to be living in social or rented accommodation and will benefit from well designed and maintained housing stock.</p>	No mitigation measures have been outlined for this policy.
Clean Green Future												
CG1 Mitigating and adapting to a changing climate	0	0	0	+	0	+	0	0	0	0	<p>This policy will contribute to improving climate resilience in the borough, and therefore brings benefits for all members of the public.</p> <p><u>Age, Disability</u></p> <p>+ Improvements to air quality through this policy will be particularly beneficial to disabled groups, the young and the elderly.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG2 Low energy buildings	0	0	0	+	0	0	0	0	0	+	<p><u>Age</u></p> <p>+ Provision of low energy and energy efficient buildings will help to support better quality housing stock now and for future first time buyers.</p> <p><u>Age, Disability</u></p> <p>+ Provision of low energy buildings will also help to improve residents' health, particularly elderly and disabled residents, by reducing exposure to cold and air pollutants. Younger groups will also experience health benefits from the development of buildings and subsequent reduction in health damaging environmental factors such as mould.</p> <p><u>Deprivation</u></p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation			
												<p>+ This policy also presents current energy/ cost savings for residents, especially important for those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p>	
CG3 Low carbon energy and heating	0	0	0	+	0	+	0	0	0	+	<p><u>Deprivation</u></p> <p>+ Low carbon energy and heating will contribute to more energy efficient homes and reduce expenditure on energy bills. This will benefit everyone, but especially those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p> <p><u>Age, Disability</u></p> <p>+ Provision of low carbon energy and heating will also help to improve residents' health, particularly elderly and disabled residents, by reducing exposure to cold and air pollutants.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.	
CG4 Embodied carbon, retrofit and the circular economy	0	0	0	+	0	0	0	0	0	+	<p><u>Deprivation</u></p> <p>+ Retrofitting existing housing stock will contribute to more energy efficient homes and reduce expenditure on energy bills. This will benefit</p>	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers.	

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>everyone, but especially those on low incomes who may struggle with living costs.</p> <p>+ Potential cost savings may also provide more disposable income and reduce levels of stress and anxiety associated with the rising cost of living.</p> <p>+ Retrofitting with a view for longevity will also aid in reducing maintenance costs associated with housing.</p> <p>+ It is possible that additional jobs opportunities will arise to fulfil this objective.</p> <p><u>Age</u></p> <p>+ Retrofitted properties will help to support better quality housing stock now and for future first time buyers.</p>	Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
CG5 Overheating	0	0	0	+	0	+	0	0	0	0	<p><u>Age, Disability</u></p> <p>+ Climate change is likely to result in increased heating events, therefore the prevention of overheating through this policy is essential, especially for elderly, young, and disabled residents who are vulnerable to overheating.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG6 Managing flood risk	0	0	0	0	0	0	0	0	0	0	<p>+ This policy will contribute to improving climate resilience in the borough through consideration of flood risk in development, and therefore brings benefits for all members of the public, especially those residing in flood zones.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG7 Sustainable drainage	0	0	0	0	0	0	0	0	0	0	<p>No protected groups are identified as specifically impacted.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
CG8 Water efficient design	0	0	0	0	0	0	0	0	0	0	<p>+ This policy is likely to result in indirect positive effects on water quality due to the outlined measures to minimise surface runoff from sewers. This may indirectly improve local water quality on a small scale, bringing minor benefits to the entire borough.</p> <p>+ Ensuring blue spaces like Lea River Park are well-designed and accessible will maximise opportunities for public use and enjoyment for all borough residents.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG9 Air quality	0	0	0	+	0	+	+	0	0	0	<p>+ The policy involves encouragement of sustainable movement patterns, including the use of public and active transport modes. Those engaging in active transport will likely experience physical and mental health benefit as a result.</p> <p>+ The policy also contributes to indirect positive effects upon biodiversity through improvements to air quality. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Age, Disability, Pregnancy/maternity</u></p> <p>+ Young children, older people, pregnant women, and those with respiratory and underlying health conditions are particularly sensitive to changes in air quality and will benefit from improvements more than other groups.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CG10 Noise and vibration	0	0	0	+	0	+	0	0	0	0	<p>+ This policy will add to the enjoyment of the community for all residents.</p> <p>+ The policy includes measures to minimise construction disturbance which is likely to have minor positive indirect effects on local biodiversity. Improved environmental</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Age, Disability</u></p> <p>+ People with autism can be especially sensitive to changes in noise. This group will especially benefit from noise mitigation. Children and young people could also be affected if work is undertaken in the vicinity of education facilities.</p>	
CG11 Contaminated land	0	0	0	0	0	0	0	0	0	0	+ This policy will improve the quality of land in the borough, and therefore brings benefits for all members of the public.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
People, Places and Spaces												
PS1 Design- and infrastructure-led approach to development	+	0	+	+	0	0	+	0	0	0	<p><u>Sex and Gender, Gender reassignment</u></p> <p>+ The policy outlines community engagement measures to ensure development suits community needs, and gender inclusive design.</p> <p><u>Age, Pregnancy/Maternity</u></p> <p>+ The policy contributes positive impacts to Tower Hamlets as it supports the growing population of the borough.</p> <p>- An increase in housing density through this policy will often support the development of tall buildings. High rise living can be conducive of social isolation and present barriers to suitable open space for all residents, resulting in poor mental health outcomes.</p>	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS2 Tall Buildings	+	0	0	0	0	+	-	-	0	0	<p>+ This policy will benefit the entire borough community.</p> <p>+ Indirect improvements to mental health are made through the communal open space requirements of new developments. Access to open space improves health and mental wellbeing, with increased access to this benefitting the local community.</p> <p>+ The provision of communal open space may enhance local natural capital. The policy also requires development to have no adverse effect on biodiversity in the local area, preserving species and habitats. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.</p> <p><u>Disability</u></p> <p>+ Improvements to the accessibility of high rise developments to those with disabilities is likely to improve living standards and reduce social isolation for those who are disabled and living in high rise developments.</p> <p><u>Sex and Gender</u></p> <p>+ The consideration of gender-inclusive design is likely to improve feelings of safety within high rise developments.</p> <p><u>Marriage and civil partnership</u></p> <p>- High rise living can be a socially isolating experience, particularly for those living alone without a partner or family. Limited socialisation opportunities are presented by such living arrangements, with residents subsequently feeling a lack of social support and sense of belonging within the community.</p>	<p>Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.</p> <p>Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.</p>

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p><u>Pregnancy/maternity</u></p> <p>- There is a high perception of anti-social behaviour in association with communal areas of tall buildings. A low sense of control over the communal setting of one's residence can be linked to poor mental health outcomes. This is particularly significant for parents with young children who may feel the safety of their children is compromised by their residential location.</p> <p>-/+ High rise living can promote barriers to suitable open space for parents with young children. Point J of this policy should go some way to alleviate this risk through the provision of high quality private communal open space, play areas and public realm which occupants of the building can use.</p>	
PS3 Securing design quality	0	0	0	+	0	+	0	0	0	0	<p>+ This policy is likely to result in improved housing, particularly through improvements to privacy for residents, creating habitable rooms and creating residential resilience to overheating. These aspects will help to support better quality housing stock now and for future first time buyers.</p> <p><u>Disability, Age</u></p> <p>+ Accessible and adaptable buildings will improve access for elderly and disabled users who may struggle to move within buildings.</p> <p>+ The policy also ensures the health and wellbeing of vulnerable users, this includes a variety of groups, however predominantly elderly, disabled, or those with long term health conditions.</p>	Securing design quality should not come at the expense of affordable housing, in order that first time buyers and those on lower incomes remain able to buy into the property market and not be priced out, or not have access to quality development.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS4 Attractive streets, spaces and public realm	+	0	0	0	0	0	0	0	0	0	<p>+ This policy promotes a range of public spaces for community use within developments, improving the local facilities available for growing communities in Tower Hamlets. This policy will therefore benefit the entire borough community.</p> <p><u>Sex and Gender</u></p> <p>+ The policy also improves safety and reduces the fear of crime through providing well-lit routes at night time, an aspect that is of particular importance to women at night.</p>	Street features and public realm that are frequented by vulnerable groups such as children and low-income groups should consider avoiding locating nearby advertisement content including hot food takeaway and betting.
PS5 Creating inclusive places	+	0	+	+	+	+	+	0	+	0	<p><u>Sex and Gender, Gender Reassignment</u></p> <p>+ This policy involves lighting and signage measures, as well as design to make areas safe for all genders, particularly reducing the fear of crime. Resultant positive effects are through improvements to equalities, ensuring all genders are able to access community spaces equally.</p> <p><u>Sex and Gender, Sexual Orientation, Disability, Race</u></p> <p>+ The policy aims to involve a number of social groups within the design process and utilise co-design. This will improve the nature of spaces and ensure they reflect the needs of the community.</p> <p><u>Age</u></p> <p>+Improving seating in open spaces will provide opportunities for the elderly to sit and rest, improving accessibility of open spaces.</p>	The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.
PS6 Heritage and historic environment	0	0	0	+	0	+	+	0	0	0	<p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											<p>personal sense of place can build with time and association with a particular area.</p> <p><u>Age, Disability, Pregnancy/maternity</u></p> <p>+ Improvements to uneven surfaces will improve the accessibility of historic locations to those who may struggle with historic surfaces, such as the elderly, disabled users, and those with mobility aids, as well as parents with pushchairs.</p>	information once development sites have come forward.
PS7 World heritage sites	0	0	0	+	0	0	0	0	0	0	<p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A personal sense of place can build with time and association with a particular area.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
PS8 Shaping and managing views	0	0	0	0	0	0	0	0	0	0	<p>+ The maintenance of local landscape and views associated with this policy will benefit the entire borough community, particularly not detracting from people's wellbeing and mental health.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
PS9 Shopfronts	0	0	0	0	0	+	0	0	0	0	<p>This policy aims to benefit the whole community by promoting a positive visual impact of shopfronts on the street and improving the economic diversity within the Borough at the same time. No protected groups are identified as specifically impacted.</p> <p>+The requirement of shopfronts to not be excessive or visually discordant, including the discouragement of neon and electronic displays is particularly sensitive to those with neurodivergence.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations
	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
PS10 Advertisements, hoardings, and signage	0	0	0	0	0	-	-	0	0	0	<p><u>Disability and pregnancy and maternity</u></p> <p>- Free standing advertisements can present an obstacle on the footway for disabled people as well as parents using pushchairs.</p>	<p>Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.</p> <p>Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered.</p> <p>Well-designed advertisement can aid in reducing sensory overload for the neurodivergent population of the borough. Enhancement of appearance should not compromise the usability of neurodivergent people.</p>
PS11 Siting and design of telecommunications infrastructure	0	0	0	0	0	0	0	0	0	0	<p>No protected groups are identified as specifically benefiting or disadvantaged by this policy.</p>	<p>No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.</p>
Inclusive Economy and Good Growth												
EG1 Creating investment and jobs	0	0	0	0	0	0	0	0	0	+	<p><u>Deprivation</u></p> <p>+ The policy provides improved job opportunities for all groups of the working population, including those with current low levels of education. With new employment prospects low-income groups in the borough will have greater opportunities to earn and save disposable income. Increased opportunities and new income will likely reduce levels of stress and anxiety associated with the rising cost of living.</p>	<p>Jobs creation must be evenly distributed across space within the borough to ensure all groups are able to easily access employment.</p>

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
EG2 New employment space	0	0	0	+	0	0	0	0	0	+	<p>+ New employment spaces will encourage outside investment and increase the number of jobs available in the borough, boosting the local economy. This policy will benefit the entire borough community.</p> <p><u>Age, Deprivation</u></p> <p>+ New employment spaces locating along major public transport routes with good accessibility is particularly beneficial to young and low income groups who likely will not have access to private vehicles to access employment.</p>	New employment spaces should be a diverse and equal mix of office space and spaces for small businesses to thrive.
EG3 Affordable workspace	0	+	0	+	0	0	0	0	+	0	<p><u>Religion, Race</u></p> <p>+ Affordable workspaces will support the generation and maintenance of small businesses, likely providing opportunities for different cultures and improving equalities in the borough overall.</p> <p><u>Age</u></p> <p>+ Affordable workspaces are also beneficial to young people setting up SME's who have a low income to do so.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
EG4 Loss and redevelopment of employment space	0	0	0	0	0	0	0	0	0	0	<p>All community members will benefit from the preservation of work spaces and subsequent maintenance of employment opportunities.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
EG5 Railway Arches	0	+	0	0	0	0	0	0	+	+/-	<p>+ This policy includes measures to ensure the accessibility to the railway arches by walking and cycling must be included within developments. This contributes to positive effects on accessibility due to walking permeability through the area. By ensuring accessibility of active travel, the overall</p>	The accessibility of disabled groups must also be considered when ensuring the walkability of the area. Footpaths must not be obstructed to allow space for wheelchair users to travel through.

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											<p>health of the community in the borough will likely improve.</p> <p><u>Deprivation</u></p> <p>+ This policy allows those who rely on active and public transport modes, such as those on low incomes, to reach the area.</p> <p>- By supporting the Railway arches provision of low-cost work spaces that fall outside of District Centres and Central Activity Zones (CAZ) those who are reliant on these spaces for work will not be subject to the same benefits that may be generated by investment in the CAZ as those who can afford workspaces within the designations.</p> <p><u>Religion, Race</u></p> <p>+ Preservation of the railway arches for their varying cultural uses is beneficial to ensuring diversity and equality are upheld in the borough.</p>		
EG5 Data centres	0	0	0	+	0	0	0	0	0	0	<p><u>Age</u></p> <p>+ Improved broadband connections will be beneficial to elderly people suffering from social isolation. Greater opportunities to connect with family and friends virtually will generate positive mental health impacts. Faster broadband will also be beneficial for young people especially students who require the utility for university work.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.	
Town Centres													
TC1 Supporting the network and hierarchy of centres	0	0	0	+ / -	0	0	0	0	0	0	+	<p>Improvements to centres will likely suit community needs, benefitting the entire borough community. A thriving, diverse community will also help to reduce social isolation for all borough residents.</p>	Developments should seek to improve the public realm.

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											<p><u>Age</u></p> <p>+ Boosted vitality and improvement to the night time economy provides spaces for socialisation, entertainment and culture that young and middle aged groups will directly benefit from.</p> <p><u>Age</u></p> <p>-There is potential for negative effects on the mental wellbeing of local residents, especially the elderly, as a result of the night time economy, and noise during night time hours.</p> <p><u>Deprivation</u></p> <p>+ The policy directly provides opportunity for employment in retail and hospitality across Tower Hamlets, including for night-time workers as a result of the night time economy. A large proportion of town centres in Tower Hamlets provide night time economy areas, improving job opportunities, especially for low-income groups seeking employment.</p>	
TC2 Protecting the diversity, vitality and viability of town centres	0	+	0	0	0	0	0	0	0	0	<p>+ Preserving town centre usage is likely to attract visitors, increase footfall and boost the economy of town centres. This policy will therefore benefit the entire borough community.</p> <p><u>Religion, Race</u></p> <p>+ Diversity preservation will ensure that different communities in the borough have their needs met with specific services and amenities.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
TC3 Town centre uses outside centres	0	0	0	0	0	0	0	0	0	0	<p>The policies aim to direct new retail development towards existing centres will likely result in a failure to meet growing demand for retail in areas outside of Metropolitan, District and Neighbourhood Centres. Lowered access to</p>	Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres, and is necessary to meet the immediate convenience needs of local people and/or support the

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											services will be disadvantageous to the wellbeing of residents in these areas.	function of designated employment locations.
TC4 Markets	0	0	0	0	0	0	0	0	+	0	<u>Race</u> + Preserving markets ensures a cultural diversity in the borough's townscape and economy, benefitting the entire borough community.	Developments should seek to improve the public realm.
TC5 Food and drink	0	0	0	+	0	0	0	0	0	0	New eating and drinking facilities are likely to provide places for socialisation which will improve the mental wellbeing of all borough users. <u>Age</u> + Under this policy, proposals for hot food takeaway must not be within 400 metres walking distance from an existing or proposed school and/or local authority leisure centre. This inclusion will ensure the physical health and wellbeing of school aged children throughout the borough.	This policy requires a delivery management plan to prevent waiting delivery drivers from acting as obstacles to users, including disabled users.
TC6 Entertainment uses	0	+	0	+	0	0	0	0	0	0	+ Commercial leisure businesses can act as attractors and support the vitality and viability of town centres. Increase footfall will likely boost the economy of town centres, benefitting the entire borough community. <u>Age, Religion/belief</u> + Commercial businesses will not be located in close proximity to a school, sensitive community, or cultural facilities including places of worship. Sensitive receptors making use of these facilities will not be adversely affected by the new presence of commercial businesses.	Developments should seek to improve the public realm. Hot food takeaway and gambling premises should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
TC7 Evening and night-time economy	+	0	+	+	0	+	0	0	0	+	<p><u>Age, Disability</u></p> <p>+ People can be especially sensitive to noise disturbance due their age or having disabilities or neurodivergence, such as autism. This policy will allow the planning system to mitigate noise impacts of a vibrant evening economy.</p> <p><u>Sex and Gender, Race</u></p> <p>+ A vibrant evening economy requires additional safety measure to be put in place. This could help to protect people vulnerable to crime at night such as women, LGBTQ+ people and people with different ethnicities. It is noted that the policy will only allow proposals to be considered where there is a high level of public transport accessibility.</p> <p><u>Deprivation</u></p> <p>+ Facilitating the evening economy will bring economic benefits to the borough in terms of employment and income.</p>	The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis.
TC8 Short-stay accommodation	0	0	0	0	0	0	0	0	0	+	<p>+ This policy promotes visitors to Tower Hamlets and is likely to improve the visitor economy, benefitting the entire borough community, without undermining housing allocation, and therefore reducing housing availability.</p> <p>- The policy states that development proposals for short-stay accommodation must not compromise the supply of C3 self-contained homes only. Alternative housing including family-sized homes and affordable housing may therefore be threatened by short-stay accommodation development.</p>	Ensure accessibility standards are adhered to in short-stay accommodation.
Community Infrastructure												

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
C1 Supporting community facilities	0	0	0	+	0	0	+	0	0	0	<p>+ The policy outlines the maintenance and enhancement of community facilities, including healthcare and sports and leisure facilities. This will likely improve physical health through encouraging physical activity, as well as improving mental wellbeing through improving spaces for socialisation and encouraging activity for all community members. This policy will encourage a sense of community and reduce social isolation by maintaining existing facilities, and prioritising new development in accessible locations.</p> <p><u>Age, Pregnancy/Maternity</u></p> <p>+ Older people and pregnant women or parents will particularly benefit from improved provision of and support from health and social care facilities, pharmacies.</p>	The policy should ensure that improvements to existing community facilities are made evenly across space in the borough so that all residents have access to improved facilities.
C2 Existing community facilities	0	0	0	+	+	0	0	0	0	0	<p>+ The retention and enhancement of existing communities, as well as the use of temporary facilities while existing facilities are closed for extended periods of time, will be beneficial to all borough community members.</p> <p><u>Disability</u></p> <p>+ This policy involves the development of accessible, inclusive new facilities, including allowing public access. This is likely to improve access to facilities to all groups of the public, including disabled users.</p> <p><u>Age</u></p> <p>+ Where school extensions are proposed and the development of play spaces is included, young children will experience positive mental and physical health benefits.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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C3 New and enhanced community facilities	0	0	0	+	0	0	0	0	+	+	<p>+ This policy will bring about benefits for the entire borough community in the form of improved physical health through providing new community facilities and leisure facilities. This also improves mental wellbeing through new social facilities.</p> <p><u>Age</u></p> <p>+ New early education and care facilities will also be located in areas of acceptable air quality, indirectly improving health. This is particularly of note as young people and older people are most at risk of respiratory illnesses such as asthma due to poor air quality.</p> <p><u>Race</u></p> <p>+ Improvements to services and access to them is particularly important to the Bangladeshi community within the borough, who demonstrate a prioritisation of improved services and activities for young people, access to a place of worship, access to healthy eating programmes and public transport facilities like bus stations.</p>	New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility.
C4 Public houses	0	0	0	+	0	0	0	0	0	0	<p>+ This policy preserves public houses and provides beneficial community spaces and socialisation venues for the entire local population.</p> <p><u>Age</u></p> <p>+ Older people in the Borough are more likely to benefit from protection of a sense of place. A personal sense of place can build with time and association with a particular area or venue, and so the preservation of public houses is beneficial. Young people, especially students who may also experience loneliness and social isolation will also experience positive effects to socialisation opportunities through this policy.</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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											- No mitigation against additional noise pollution as a result of Public Houses is set out by this policy, and so adverse effects on nearby residential receptors can be expected.	
C5 Arts and culture facilities	0	0	0	0	0	0	0	0	0	0	+ Preserving arts and culture facilities ensures diversity is maintained and enhanced in the borough, benefitting all community members.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
Biodiversity and Open Space												
BO1 Green and blue infrastructure	+	0	0	+	0	0	+	0	0	+	<p>+ The community will benefit from reducing pollution, improving air quality, enhancing biodiversity, screening noise, improving natural drainage, reducing flood risk, providing benefits to mental and physical health. The promotion of space for cultural activities under this policy will also be beneficial to community cohesion throughout the borough.</p> <p><u>Deprivation</u></p> <p>+ Access to open space is particularly beneficial to low income groups who may not have access to privately owned green space.</p> <p><u>Pregnancy and maternity</u></p> <p>+ Green spaces, particularly those with play spaces included are also beneficial to parents with young children as it enables them to access opportunities for both physical activity and socialisation.</p> <p><u>Sex and Gender, Age</u></p> <p>+ Inter-generational open space with a range of activity spaces included are beneficial to children</p>	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.

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	Sex and gender	Religion/belief	Gender reassignment	Age	Sexual orientation	Disability	Pregnancy/maternity	Marriage/civil partnership	Race	Deprivation		
											and young people, as well as adults and the elderly, providing spaces for various sport types and increasing physical activity opportunities. Additionally, designing spaces with women and girls in mind will likely increase the feelings of safety in open spaces and encourage physical activity and socialisation in these spaces.	
BO2 Open spaces and the green grid networks	0	0	0	+	0	+	+	0	+	+	<p><u>Age</u></p> <p>+ Preservation and creation of open space will benefit younger people by providing quality recreational space.</p> <p><u>Disability</u></p> <p>+ Green spaces provide particular benefits to people seeking to use these areas for management mental health and/or stress.</p> <p><u>Pregnancy/maternity</u></p> <p>+ Quality green space is important for parents with push chairs. Play areas benefit this group by providing a safe recreational space for children.</p> <p><u>Deprivation</u></p> <p>+ High quality parks and open spaces will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p> <p><u>Race</u></p> <p>+ Access to open space is especially important to the Bangladeshi community, who currently are the most likely group in the borough to say that they do not have access to spaces with opportunities for play and recreation, the main reason being the lack of parks and green spaces in their local area.</p>	<p>New parks and open spaces should be accessible to all members of the public. Design should especially consider the safety of women and young girls by including appropriate lighting, accessible pathways and access and egress points. The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.</p>

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BO3 Water spaces	0	0	0	0	0	0	0	0	0	0	+ Improved public access to high quality water spaces will be beneficial to the mental wellbeing of the community in the borough.	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
BO4 Biodiversity and access to nature	0	0	0	0	0	+	0	0	0	+	<p>This policy aims to provide benefits to all members of the public.</p> <p><u>Disability</u></p> <p>+ The maintenance and enhancement of a greener landscape ecological value can add to sense of place. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas, particularly people seeking to manage mental health and/or stress.</p> <p><u>Deprivation</u></p> <p>+ A greener urban landscape will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p>	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
BO5 Urban greening	0	0	0	0	0	0	0	0	0	+	<p>Additional planting around the borough will improve the environmental surroundings, contributing to improved mental wellbeing for all community members.</p> <p><u>Deprivation</u></p> <p>+ A greener urban landscape will benefit people living in high density residential areas who may not have access to private gardens or outside space.</p> <p>+ The provision of allotments will be particularly beneficial to low income groups who do not have access to private gardens with which to grow food crops for healthy living purposes.</p>	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.

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BO6 Play and recreation spaces	0	0	0	+	0	+	+	0	0	+	<p><u>Pregnancy/maternity</u></p> <p>+ Quality recreational spaces are important for parents in entertaining and socialising children. Play areas benefit this group by providing a safe recreational space for children.</p> <p><u>Age, Disability</u></p> <p>+ Play is an important component of the physical and mental development of children. Creating safe spaces for children to socialise and explore will benefit the overall health of the next generation in the borough. This includes providing spaces for disabled children to play and utilise play equipment, as well as providing quiet seating and visual aids, ensuring disabled children are able to utilise play spaces and socialise.</p> <p><u>Deprivation</u></p> <p>+ Providing play space nearby to community amenities will benefit people living in high density residential areas, or areas of high deficiency to play space, who may not have access to private gardens or outside space.</p>	<p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>The policy might encourage business and facilities to open up in play and recreational spaces as well as ensure active travel routes increase the busyness of parks. A busier, more vibrant environment will lessen the prevalence of idle parks that promote fear in women, especially mothers.</p>
BO7 Food Growing	0	0	0	0	0	0	0	0	0	+	<p>+ Food growing can generate opportunities for socialisation and cross-cultural engagement in the community, benefitting the mental wellbeing of all those taking part.</p> <p><u>Deprivation</u></p> <p>+ Community food growing may be helpful to those living on low incomes in the area.</p> <p>+ The provision of allotments will be particularly beneficial to low income groups who do not have access to private gardens with which to grow food crops for healthy living purposes.</p>	<p>Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.</p>

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Movement and Connectivity												
MC1 Sustainable transport	+	0	0	0	0	+	0	0	+	+	<p>+ The encouragement of active travel results in direct positive effects for the physical and mental health of the population. A modal shift away from public transport will also likely reduce air pollution, indirectly positively impacting physical health.</p> <p><u>Disability</u></p> <p>+ This policy is likely to improve access to all users, including those with mobility issues.</p> <p><u>Deprivation</u></p> <p>+ Improving public and active transport also allows those on low incomes to access further areas of the Borough. The policy aims to reduce severance and increase permeability across the Borough. Greater ease of transport will improve employment opportunities for those unable to afford private transport in the borough.</p> <p><u>Sex and gender, Race</u></p> <p>+ Improvements to the safety and accessibility of active transport modes such as cycling will encourage uptake by less frequent users such as women and ethnic groups.</p>	<p>Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that Cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users.</p> <p>In order to successfully encourage the uptake of public transport, bus stops should ideally be located so that nobody in the neighbourhood is required to walk more than 400 metres from their home as per the governments Guide to Best Practice on Access to Pedestrian and Transport Infrastructure.</p>
MC2 Active travel and healthy streets	+	0	0	+/-	0	+/-	+	0	+	+	<p><u>Age</u></p> <p>+ Older people could particularly benefit from easier active travel, due to the associated health benefits.</p> <p><u>Disability</u></p> <p>+ Better connectivity between footways/cycleways and public transport will particularly benefit people who are unable to cycle.</p>	<p>Active travel infrastructure should be accessible and inclusive.</p> <p>Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with</p>

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											<p><u>Age/ Disability</u></p> <p>- Implementing measures that encourage reduced car dependency could impact on the ability of those with limited mobility to access services.</p> <p>+ Segregating pedestrian and cycle lanes will improve the safety of users, particularly those who may be hard of hearing or may not be able to see other users. This will improve safety for these users, particularly elderly and disabled users and parents with pushchairs.</p> <p><u>Deprivation</u></p> <p>+ Active travel brings benefits that add to the general health and wellbeing of the community.</p> <p><u>Sex and gender, Race</u></p> <p>+ Improvements to the safety and accessibility of active transport modes such as cycling will encourage uptake by less frequent users such as women and ethnic groups.</p>	<p>charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p>
MC3 Impacts on the transport network	+	0	+	+	0	+	0	0	0	0	<p>This policy considers improvements to air quality through new developments, generating positive impacts on the respiratory health of the boroughs population.</p> <p><u>Sex and gender, Gender reassignment, Age, Disability</u></p> <p>+ The inclusion of both transport assessments and Active Travel Zone (ATZ) assessments will consider safety and night-time uses of active travel routes. This will assist in developing routes where users feel safe, and encourage utilisation of these routes for vulnerable groups, including women and girls, gender diverse people, children and older people, and people with disabilities.</p>	<p>No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.</p>

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MC4 Parking and permit-free	0	0	0	-/+	0	-/+	-/+	0	0	-/+	<p>This policy involves the provision of electric vehicle (EV) charging in new developments. Encouragement of sustainable vehicles usage is likely to reduce GHGs from private vehicles, improving air quality and the overall respiratory health of the population. Provision is also supported for disabled parking.</p> <p><u>Deprivation</u></p> <p>+ The policy also includes requirements for secure cycle parking which is likely to reduce bicycle theft in Tower Hamlets. This is beneficial for those who's only accessible mode of transport as a result of low-income is cycling.</p> <p>- This policy supports the maximisation of parking in some locations with low transport accessibility. This could see the increase in private vehicle use in certain locations, rather than support improvements to sustainable transport. This may disproportionately affect lower income groups.</p> <p><u>Age and Disability and Pregnancy and maternity</u></p> <p>- EV charging can present barriers to the elderly and those with disabilities, through trailing cables, parking bays being too narrow.</p> <p>- The policy outlines car free development and a reduction in residential car parking within areas of good public transport accessibility. This may restrict accessibility for those with disabilities parents with pushchairs who may require use of a</p>	<p>It is recommended that the Purple Badge Scheme is implemented to ensure there will be no negative impacts on protected groups, such as disabled people.</p> <p>Cycle parking should be high-quality and suitable for a range of cycles including adapted cycles and cargo bikes as per the London Cycling Design Standards.</p> <p>Management should protect priority bays to maintain accessibility for protected groups.</p> <p>EV charging points should adhere to the British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022)²².</p>

²² British Standards Institution's Electric vehicles Accessible charging – Specification (PAS 1899:2022) [online] available at: <https://www.bsigroup.com/en-GB/standards/pas-1899/>

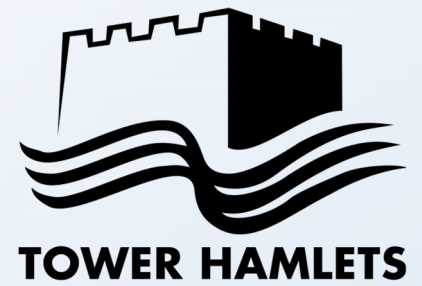
Policy	Impact										Summary of impact on protected characteristics	Mitigation measures / Recommendations	
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												car and therefore limit accessibility, disproportionately affecting these groups.	
MC5 Sustainable delivery, servicing and construction	0	0	0	0	0	0	0	0	0	0	0	This policy considers improvements to air quality through new developments using sustainable freight through water, rail and road (zero emission vehicles), generating positive impacts on the respiratory health of the boroughs population.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
Reuse, Recycling and Waste													
RW1 Managing our waste	0	0	0	0	0	0	0	0	0	0	+	<u>Deprivation</u> + Maximising the capacity and efficiency of waste facilities will improve the streetscape around flats and higher density residential areas. This could bring benefits to aesthetics, accessibility and perception of crime by reducing street waste storage areas.	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
RW2 New and enhanced waste facilities	0	0	0	0	0	0	0	0	0	0	0	+ The integration of new waste facilities into local landscape settings will likely result in minor positive effects on landscape setting. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.	New waste facilities to be constructed and utilise existing brownfield sites to reduce negative biodiversity and landscape impacts associated with new development.
RW3 Waste collection facilities in new development	0	0	0	0	0	0	0	0	0	0	0	+ Through improved collection systems and encouragement of recycling, reductions in overall waste generation brought about by this policy is likely to bring indirect minor improvements to the landscape and biodiversity of the borough. Improved environmental surroundings will likely generate positive impacts on mental health for those residing in improved areas.	Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management.



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London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix I: Health Impact Assessment



London Borough of Tower Hamlets

Local Plan Integrated Impact Assessment

Appendix I: Health Impact Assessment

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1 Introduction

1.1 Overview

- 1.1.1. The London Borough of Tower Hamlets (LBTH) is currently preparing a New Local Plan (NLP), which will replace the Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits adopted in 2020¹. The Tower Hamlets NLP will comprise five sub-areas, as planning functions for the London Legacy Development Corporation (LLDC) in the north-east of LBTH are expected to be returned to LBTH in 2024. The sub-areas are City Fringe, Central Area, Lower Lea Valley, Isle of Dogs and South Poplar, and Hackney Wick and Fish Island (current LLDC area).
- 1.1.2. An Integrated Impact Assessment (IIA) has been undertaken to ensure that sustainability aspects are incorporated into the NLP. The IIA enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. This process also helps to simplify outcomes and recommendations for policymakers.
- 1.1.3. As part of the IIA, a Health Impact Assessment (HIA) has been undertaken to assess the impacts of the NLP on human health in LBTH, and the likely effects on health outcomes in the local population.

The outcomes of the HIA have informed the IIA.

1.2 Local Plans

- 1.2.1. Section 3 of the National Planning Policy Framework (NPPF)² requires that each local planning authority should prepare a local plan for its area, which guides decisions on future development proposals and addresses the needs and opportunities of the area.
- 1.2.2. Topics that local plans usually cover include housing, employment and infrastructure. They also identify where development should take place and areas where development should be restricted. Once in place, local plans become part of the statutory development plan, which is the starting point for determining local planning applications.
- 1.2.3. The NPPF states that the *'planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities'*.

¹ Tower Hamlets Council (2020) Tower Hamlets Local Plan 2031. Available at: https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH_Local_Plan_2031_accessibility_checked.pdf

² Ministry of Housing, Communities and Local Government Framework, National Planning Policy Framework, 2021 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

1.3 Integrated Impact Assessment

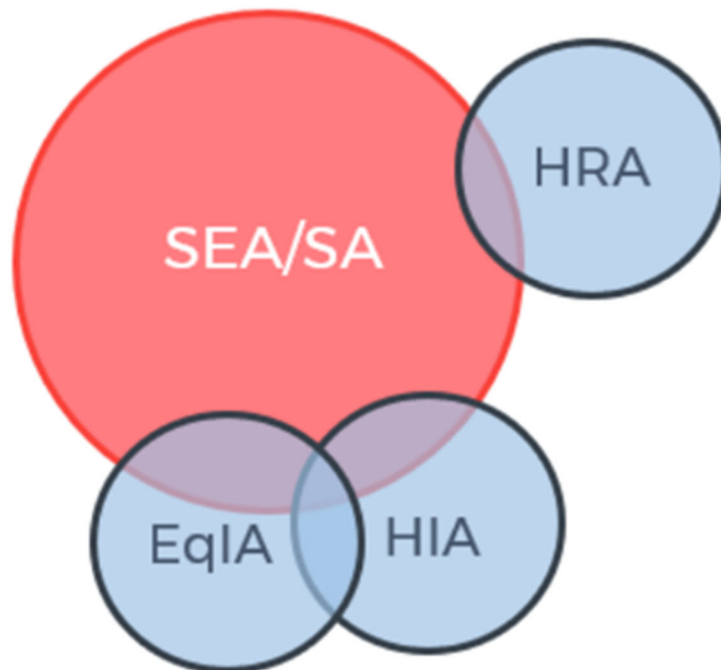
1.3.1. The IIA combines the following assessment processes:

- Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA);
- Equalities Impact Assessment (EqIA);
- Health Impact Assessment (HIA); and
- Habitats Regulations Assessment (HRA).

1.3.2. An integrated assessment approach enables synergies and cross-cutting impacts to be identified and avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work. A single process can improve efficiencies in the assessment itself, as many of the issues covered in the different forms of assessment overlap.

1.3.3. This process also helps to simplify outcomes and recommendations for policymakers. This is demonstrated in **Figure 1-1** below. More detail on each of the components of the IIA have been described below.

Figure 1-1 - IIA and Component Processes



2 Health Impact Assessment

2.1 Introduction

- 2.1.1. HIA is a systematic approach to identifying the differential health and wellbeing impacts, both positive and negative, of projects, plans or strategies.
- 2.1.2. HIA uses both qualitative and quantitative evidence, including public and other stakeholders' perceptions and experiences, as well as public health knowledge. It is particularly concerned with the distribution of effects within a population, as different groups are likely to be affected in different ways, and therefore looks at how health and social inequalities might be reduced or increased by a proposed project or plan.
- 2.1.3. HIA has been defined as:
- “...a combination of procedures, methods and tools by which a policy, programme or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population”³.*
- 2.1.4. In this context, ‘health’ is defined by the World Health Organisation as:
- “...a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity”⁴.*
- 2.1.5. Health determinants are the personal, social, cultural, economic and environmental factors that influence the health of individuals or populations. These include a range of factors such as income, employment, education and social support.
- 2.1.6. Health inequality can be defined as the difference in either health status, or the distribution of health determinants, between different population groups. Some health inequalities are unavoidable, others are not so, and may well be unjust and unfair.

2.2 Objective of a Health Impact Assessment

- 2.2.1. The aim of a HIA is to support and add value to the decision-making process by providing a systematic analysis of the potential impacts, as well as recommending opportunities, where appropriate, to enhance positive impacts, mitigate negative impacts and reduce health inequalities.

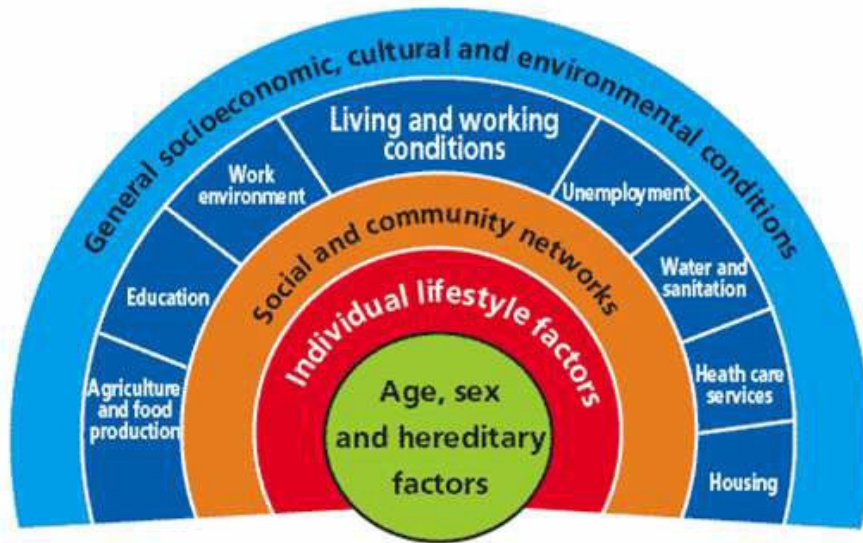
³ World Health Organisation, (n/a). Definition of health assessment (HIA). Available online at: <http://www.euro.who.int/en/health-topics/environment-and-health/health-impact-assessment/definition-of-health-impact-assessment-hia>

⁴ World Health Organisation (n/a). Constitution. Available online at: <https://www.who.int/about/who-we-are/constitution>

2.3 Socio-Environmental Model of Wellbeing

2.3.1. HIA’s apply the below model of health and wellbeing (**Figure 2-1**). The Socio-Environmental Model of Wellbeing considers that health and wellbeing are a result of external influences, where an individual or population experiences a combination of adverse external factors which could result in health inequality.

Figure 2-1 - The Socio Environmental Model of Health and Wellbeing



2.4 Overall aim of this HIA

2.4.1. The overall aim of this HIA will be to identify the aspects of the NLP which have the potential to affect people’s health, both directly and indirectly, in order to develop recommendations to maximise any health benefits, and minimise or remove any adverse impacts.

3 Scope and Methodology

3.1 Introduction

3.1.1. A rapid desktop HIA was undertaken in July 2023. The key tasks for this HIA were as follows:

- Develop a summary health and wellbeing baseline and profile of the LBTH area;
- Identify relevant evidence from literature; and
- Assess the potential health and wellbeing impacts of the NLP, and the nature and likelihood of such impacts.

3.1.2. The approach taken in this HIA is based on guidance produced by the Wales Health Impact Assessment Support Unit⁵, LBTHs own HIA guidance⁶, and professional judgement based on experience of undertaking similar HIAs.

3.2 Scope

Study Area

3.2.1. This is a rapid, desk-based assessment of the direct and indirect health effects on local communities anticipated to result from the implementation of the ten themes and 72 proposed policies of the NLP. The geographic study area of this HIA is therefore the LBTH area.

Study Population

3.2.2. The population scope of this HIA includes the LBTH resident population.

3.2.3. The main vulnerable groups within the population that have been considered are:

- Children and young people;
- Older people;
- People with disabilities and mobility impairment;
- People with existing health conditions;
- Unemployed and low-income groups; and
- Socially excluded or isolated groups.

⁵ Health Impact Assessment: A practical guide. Wales HIA Support Unit, accessed online: https://phwwhocc.co.uk/whiasu/wp-content/uploads/sites/3/2021/05/HIA_Tool_Kit_V2_WEB-1.pdf

⁶ Tower Hamlets Council - Health Impact Assessment Guidance July 2021 v2, accessed online: <https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Building-control/Application-processing/HIA-guidance.pdf>

Determinants of Health

3.2.4. The key determinants of health and wellbeing that have been considered are:

- Air Quality,
- Noise,
- Housing and Homelessness,
- Economy and employment,
- Skills and education,
- Social cohesion and community safety,
- Access to services,
- Physical activity,
- Green Infrastructure, and
- Climate change resilience.

Baseline Health Profile

3.2.5. The baseline and health profile of the LBTH area have been compiled using existing, publicly available data, including:

- Office for Health Improvement & Disparities (OHID) Local Authority Health Profiles;
- Office for National Statistics Labour Market Profiles (Nomis);
- Greater London Authority data;
- Tower Hamlets Annual Public Health report 2022⁷, and
- PHE “Local Health” datasets.

Appraisal

3.2.6. The proposed ten key policy themes were considered and assessed against each of the identified determinants of health, looking first at the baseline conditions of the study area population, evidence of how each determinant impacts human health, the effect that the general principles and policies are likely to have on the health of the study area population, and any vulnerable groups, as presented in **Section 5**. The assessment followed the key detailed in **Table 3-1** below.

Table 3-1 – Key to Assessment

Effect	Symbol
Positive Health outcomes	+

⁷ Tower Hamlets Annual Public Health Report 2022, accessed online: <https://www.towerhamlets.gov.uk/Documents/Public-Health/TowerHamletsPublicHealthReport2022.pdf>

Effect	Symbol
Negative health outcomes	-
Mixed health outcomes	+/-
Uncertain health outcomes	?
No health effects	0

3.2.7. Mitigation or recommendations are provided for each policy where this is applicable. Where the impact is deemed positive or neutral, any recommendations will outline how to ensure there is no negative impact or opportunities to further advance equality and inclusivity.

3.3 Assumptions and Limitations

3.3.1. Data collected by Healthwatch Tower Hamlets is not entirely representative. Although attempts were made to reach out to all borough communities by attending events, handing out leaflets, and reaching out to organisations it was found that some community groups were hesitant to take part in surveys collecting health data due to a belief that it will not result in any changes in the borough. As such, the data does not necessarily represent the experiences of this community in particular.

4 Community Profile and Baseline

4.1 Introduction

- 4.1.1. Amongst the communities living in, and directly affected by, any changes brought about by the key themes or policies of the NLP, the proportion and profile of vulnerable groups, identified previously in **Section 3.2**, have been outlined below using publicly available data.
- 4.1.2. Community profile data has been used to express the status of vulnerable groups with respect to their vulnerable health status and/or deprivation. In some cases, Health Profile Indicators are implicit rather than explicit, where direct Health Profile Indicators were not available.

4.2 Baseline

- 4.2.1. This section summarises the socio-economic and community baseline conditions for the spatial scope of the HIA. The most recent publicly available information has been used to create these profiles.

Population

- 4.2.2. The total population in LBTH in 2021 was 312,300. Of this total population, 157,100 (50.3%) were male and 155,200 (49.7%) were female⁸.
- 4.2.3. As stated by the LBTH Council Overcrowding and Under Occupation Statement 2013, overcrowding is a prominent issue in Tower Hamlets, impacting on residents' health, education, employment opportunities and well-being. As of 2020, LBTH population density was 16,237 persons per square kilometre, ranking it as the most densely populated local authority areas in the country⁹.
- 4.2.4. The 2021 Census data indicates that the predominant ethnicity of LBTH is Asian/British Asian (44.4%). The proportion of the population which are ethnically white is 41.6% lower than the national average¹⁰. The proportion of LBTH's population which is composed of non-white ethnic groups is higher than the national average, as outlined in **Table 4-1**.

⁸ [Labour Market Profile - Nomis - Official Census and Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/)

⁹ [borough profile \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk/)

¹⁰ [Tower Hamlets facts and figures - E09000030 - ONS](https://www.towerhamlets.gov.uk/)

Table 4-1 – Ethnicity of LBTH Population 2021¹⁰

Ethnicity	Tower Hamlets(%)	England (%)
White	39.4	81.0
Mixed/multiple ethnic groups	5.0	3.0
Asian/Asian British	44.4	9.6
Black/African/Caribbean/Black British	7.3	4.2
Other Ethnic group	3.9	2.2

4.2.5. The 2021 Census data outlines the principle religious affiliations reflected in the population of LBTH, and how their proportions compare to national figures. The population of LBTH is predominantly Muslim (39.9%) with the second largest group identifying as of no religion (26.6)¹⁰. These proportions differ significantly from that of a national trend as demonstrated in **Table 4-2** below.

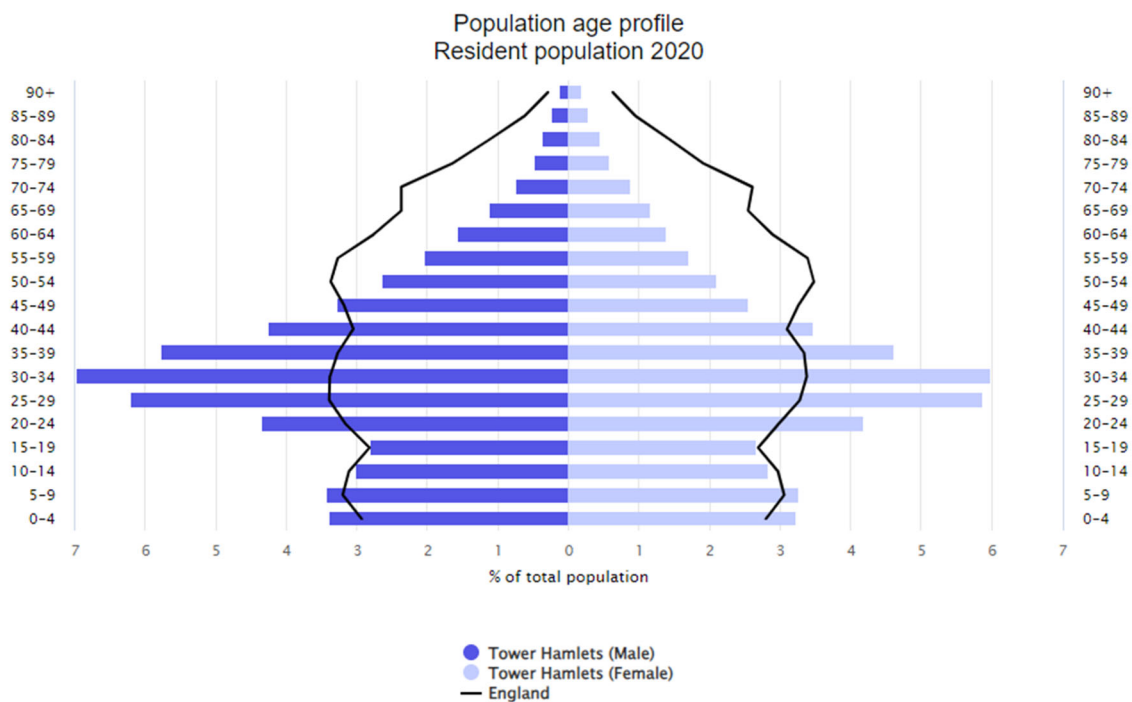
Table 4-2 – Religion of LBTH Population 2021¹⁰

Religion	Tower Hamlets (%)	England (%)
Christian	22.3	46.3
Buddhist	1.0	0.5
Hindu	2.0	1.8
Jewish	0.4	0.5
Muslim	39.9	6.7
Sikh	0.3	0.9
Other Religion	0.5	0.6
No Religion	26.6	36.7
Religion not stated	6.9	6.0

Age

4.2.6. The age profile within LBTH indicates that the population is composed of predominantly Adults, with 75.9% of the population aged between 16-64. This is 5.1% higher than the London average and 11.1% higher than the national average⁸. Within this age group, Tower Hamlets has one of the youngest populations in the country. The largest age group in the borough is 20-39 years at 46%, a figure much higher than that of London (33%) and England (26%)⁹.

Figure 4-1: Population Age Profile of LBTH 2020¹¹



Life Expectancy

4.2.7. Life Expectancy is the measure of the average number of years a person would expect to live in good health based on contemporary mortality rates and prevalence of self-reported good health. The prevalence of good health is derived from responses to a survey question on general health.

¹¹ Population Age Profile [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](https://data.oahid.org.uk/)

- 4.2.8. Life expectancy in LBTH is largely representative of national trends. For males in LBTH, life expectancy (three year range) is 79.9 years, similar to that of the national life expectancy of 79.4 years and slightly below the London average of 80.3 years. The same pattern can be noted for females in LBTH who have a life expectancy of 83.3 years, which is on par with the national average of 83.1 years and slightly lower than the London average of 84.3 years¹². The life expectancy for men in LBTH is approximately 3.4 years less than women in the borough. Gendered differences in life expectancy are representative of regional and national trends.
- 4.2.9. There is significant variation within LBTH's wards life expectancy for both males and females. **Table 4-3** details average life expectancy for specific wards in the borough.

Table 4-3 – Life Expectancy by Ward in LBTH 2021¹³

Ward	Life Expectancy (Males)	Life Expectancy (Females)
Bethnal Green	79.9	84.5
Blackwall & Cubitt Town	82.3	83.1
Bow East	78	81.3
Bow West	79.2	84.4
Bromley North	82.2	86.6
Bromley South	78.8	80.9
Canary Wharf	87.2	85.8
Island Gardens	81.7	84.6
Lansbury	77.1	81.1
Limehouse	N/A - not available	84.7
Mile End	77.4	80.5
Poplar	80.2	83.2

¹² Life Expectancy [Local Authority Health Profiles - Data - OHID \(phe.org.uk\)](https://www.phe.org.uk/local-authority-health-profiles-data)

¹³ [Local Health - Office for Health Improvement and Disparities - Indicators: maps, data and charts](https://www.hpa.org.uk/local-health-office-for-health-improvement-and-disparities-indicators)

Ward	Life Expectancy (Males)	Life Expectancy (Females)
St Dunstan's	78.4	84.6
St Katharine's & Wapping	82.8	84.1
St Peter's	77.9	83.6
Shadwell	79.3	83.7
Spitalfields & Banglatown	81.3	N/A - not available
Stepney Green	75.4	80.1
Weavers	79.4	84.2
Whitechapel	82.3	86.2

4.2.10. The gendered variation in life expectancy within LBTH points to significant differences in health and wellbeing between wards (though some variation may be attributable to the small population that these statistics are derived from). Discounting the wards of Limehouse and Spitalfields and Banglatown due to missing data, the greatest variation in male life expectancy between wards is 11.8 years (with the lowest expectancy in Stepney Green and the highest in Canary Wharf). The greatest female variation in life expectancy between wards is lower than the male variation at 6.8 years (with the lowest expectancy in Stepney Green and the highest in Whitechapel). The largest intra-ward variation between male and female life expectancy is 6.2 years and comes from St. Dunstan's.

Weight and Physical Activity

- 4.2.11. In 2021/22 the proportion of adults (aged 18+) in LBTH who were categorised as overweight or obese was 47.8%. This is lower than the London average of 55.9%, and much lower than the average in England which is 63.8% of the population¹⁴.
- 4.2.12. The proportion of the adult population describing themselves as physically active within LBTH is 67.6%. This is marginally higher than the proportion of the adult population describing themselves as physically active across London as a whole (66.8%), and on par with the rest of England (67.3%)¹⁵.
- 4.2.13. Obesity amongst children is measured through the National Child Measurement Programme (NCMP), which measures the weight and obesity level of both reception children (aged 4-5 years) and year 6 children (aged 10-11 years).
- 4.2.14. The prevalence of overweight children among year 6 children in LBTH was 29.7%, which is significantly higher than both the London average of 25.8% England average of 23.4%. Among reception children, the percentage of children deemed overweight was 19.9%, which was lower than the England average of 22.6%. The proportion of those deemed to be obese amongst in reception children was 10.9%, which was marginally higher than both the London average of 10.8% England average of 10.1%¹⁶.

Lifestyle

- 4.2.15. Smoking is a major risk factor for many diseases, such as lung cancer, chronic obstructive pulmonary disease (COPD) and heart disease, as well as being linked to cancers in other organs, including lip, mouth, throat, bladder, kidney, stomach, liver and cervix.
- Smoking prevalence among adults is slightly lower than the national average with 11.7% of over 18s classed as smokers compared to 12.7% nationally. In 2021/22 4.5% of mothers smoked during pregnancy, a considerably lower rate than both the national average (9.1%)⁹.
- 4.2.16. The number of COPD emergency hospital admissions in LBTH in 2021 varied significantly by ward. **Table 4-4** exhibits shows the number of emergency hospital admission for the condition, with 18 out of the 20 wards having higher hospitalisation rate than the England average of 100 Standardised Admission Ratio (SAR).

¹⁴ <https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data> Adult Prevalence Obesity Profile - Data - OHID (phe.org.uk)

¹⁵ Physical Activity - Data - OHID (phe.org.uk)

¹⁶ Child Prevalence Obesity Profile - Data - OHID (phe.org.uk)

Table 4-4 - Emergency Hospital Admissions for Chronic Obstructive Pulmonary Disease (COPD) in LBTH 2021

Ward	LBTH COPD emergency hospital admissions SAR)
Bethnal Green	179.8
Blackwall & Cubitt Town	154.6
Bow East	201.3
Bow West	155.3
Bromley North	143.7
Bromley South	141.7
Canary Wharf	147.5
Island Gardens	121.8
Lansbury	199.5
Limehouse	171.9
Mile End	204.8
Poplar	177.1
St Dunstan's	149.5
St Katharine's & Wapping	43.3
St Peter's	311.3
Shadwell	154.7
Spitalfields & Banglatown	177
Stepney Green	138.5
Weavers	168.7
Whitechapel	97

Unemployment/Economy

- 4.2.17. According to data collated in 2021, in LBTH a total of 190,300 people are considered to be economically active (aged 16-64 years). Of the remaining economically active population, 8,700 people or 4.6% are unemployed. Unemployment in LBTH is slightly higher than the average in London of 4.4% and England average of 3.6%⁸.
- 4.2.18. Of those considered economically inactive, 41.6% are classified as looking after family/home, a much higher proportion than that of London (24.6%) and England (19.8%).
- 4.2.19. LBTH has a higher-than-average proportion of workers in high value occupations when compared to the rest of England. 62.0% of the population in LBTH are employed in SOC 2010 Major Groups 1-3, including managerial and professional occupations. This is 10.4% higher than the England average of 51.6%⁸.
- 4.2.20. At £870, weekly median earnings for residents in LBTH are the second highest in the UK after the City of London⁹. Comparatively, the average weekly earnings for London is reported to be £765.4, and for all of England is less at £642.2⁸.
- 4.2.21. LBTH experiences great disparity in occupation type and income between residents and workers. Over half of the jobs based in Tower Hamlets are in the financial, professional, and technical sectors but just one third of resident workers are employed in these sectors. Residents are more likely to work in the distribution, hotels and restaurants sector. Additionally, in 2019 residents earned on average £90 less per week than those working in Tower Hamlets – the largest gap between workers and residents in London⁹.

Education

- 4.2.22. The proportion of the population of LBTH who have gained formal qualifications is marginally lower at all NVQ levels, compared to the wider London area. Additionally, the proportion of people in LBTH who have no formal qualifications is higher than the London average. **Table 4-5** shows the percentages of the population in LBTH with qualifications compared to London and England averages.

Table 4-5 – Qualification Level in LBTH 2021⁸

Qualification	LBTH (%)	London (%)	England (%)
NVQ4 and Above	52.1	59.0	43.6
NVQ3 and Above	64.8	71.4	61.5
NVQ2 and Above	76.8	81.5	78.1
NVQ1 and Above	83.0	87.1	87.5
Other Qualifications	10.6	7.4	5.9

Qualification	LBTH (%)	London (%)	England (%)
No Qualifications	6.5	5.5	6.6

Health

4.2.23. The proportion of residents within LBTH living with a long-term illness or health condition is 13.5%. This is 4.1% lower than the national average of 17.6%¹⁷. Prevalence of long-term illness varies greatly between wards as demonstrated below in **Table 4-6**. The lowest proportion of long-term illness comes from Canary Wharf at 8.3%, and the highest prevalence of long-term illness can be found in Stepney Green at 17.8%.

Table 4-6 – Prevalence of Long-term Illness by Ward 2021

Ward	Long-term Illness (%)
Bethnal Green	14
Blackwall & Cubitt Town	8.8
Bow East	14.8
Bow West	13.6
Bromley North	14.6
Bromley South	13.9
Canary Wharf	8.3
Island Gardens	9.7
Lansbury	16.9
Limehouse	9.6
Mile End	14.4
Poplar	13.7

¹⁷ Long-term illness [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

Ward	Long-term Illness (%)
St Dunstan's	16.3
St Katharine's & Wapping	9
St Peter's	14.9
Shadwell	16
Spitalfields & Banglatown	13.9
Stepney Green	17.8
Weavers	15.2
Whitechapel	11.9

4.2.24. Suicide rates within areas can provide an indication of the current state of mental health of residents. The suicide rate within LBTH is 6.6 per 100,000 people. This rate is lower than the London rate of 7.2 per 100,000 and the England average of 10.4 per 100,000¹⁸.

Self-assessed health within LBTH indicates that the resident population consider themselves to be a healthy population. In LBTH in 2011, 85.1% of the population rated their health as 'very good' or 'good', with 10% stating they have 'fair' health. Additionally, 3.6% of the population stated they had 'bad' health, and 1.3% as 'very bad'¹⁰.

Income

4.2.25. In LBTH, the proportion of children (under 16 years) in relative low-income families is significantly higher than the London average, at 26.7% and 16.4% respectively¹⁹. This proportion is also higher than the England average of 19.9%, showing LBTH to have significantly higher than average number of children living in low-income families.

4.2.26. **Table 4-7** below exhibits the average gross hourly and weekly wages of residents in full-time employment within LBTH, compared to both London and England averages. Average wages of LBTH residents in full-time employment are higher both per hour and per week compared to both the London average, as well as the rest of England.

¹⁸ Suicide Rates [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

¹⁹ Children living in low-income families [Public health profiles - OHID \(phe.org.uk\)](https://publichealthprofiles.org.uk/)

Table 4-7 – Average Gross Weekly and Hourly Earnings of Residents in LBTH 2022⁸

	LBTH (£)	London (£)	England (£)
Gross Weekly Earnings	806.9	765.4	642.2
Gross Hourly Pay	21.26	20.00	16.37

Deprivation

- 4.2.27. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small neighbourhoods in England²⁰. IMD is used by local governments to focus programmes in the most deprived areas and develop strategies, such as the NLPR in RBKC. IMD measures deprivation in small areas / neighbourhoods called Lower Super Output Areas (LSOAs). There 32,844 LSOAs in England.
- 4.2.28. In 2019, of the 144 LSOAs across LBTH, 44 were ranked within the 30% most deprived neighbourhoods and 35 were within the 40-50% of most deprived neighbourhoods. 14 LSOA's were within the 40-50% least deprived neighbourhoods, and 8 were within the 30-20% least deprived neighbourhoods. Only one LSOA's in LBTH was ranked in the 10% least deprived neighbourhoods²¹.
- 4.2.29. The most deprived LSOA's in LBTH are located in the north of the borough and consist of the wards Lansbury, St. Peter's and Stepney green.
- 4.2.30. The least deprived LSOA's in LBTH are located in the south of the borough and consist of the wards Island Gardens, Canary Wharf and St Katherine's and Wapping.

²⁰ [English Indices of Deprivation 2019: research report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

²¹ [Indices of Deprivation 2015 and 2019 \(communities.gov.uk\)](https://communities.gov.uk)

5 Assessment of Policies

5.1 Introduction

- 5.1.1. The policies of the NLP have been reviewed and assessed against the key determinants of health, previously outlined, to identify potential effects within the study area population.
- 5.1.2. Policies have been split into the following themes for ease of assessing, as follows:
- Delivering the Local Plan;
 - Homes for the Community;
 - Clean Green Future;
 - People, Places and Spaces;
 - Inclusive Economy and Good Growth;
 - Town Centres;
 - Community Infrastructure;
 - Biodiversity and Open Space;
 - Movement and Connectivity; and
 - Reuse, Recycling and Waste.

5.2 Delivering the Local Plan

Assessment Summary

- 5.2.1. The assessment identified the following social groups that could be affected by Delivering the Local Plan policies:
- Infants/children and young people including those leaving care;
 - Older people;
 - People with long term health conditions;
 - Women and girls;
 - Unemployed and low-income groups; and
 - Socially isolated groups including new and expectant mothers.
- 5.2.2. The Delivering the Local Plan policies set out a holistic approach to the development of the NLP, and as such, are anticipated to bring about a high degree of positive effect across numerous social groups.
- 5.2.3. Low-income and unemployed groups are positively impacted by the inclusion of developer contributions. By ensuring developers maximise contributions to the delivery of affordable housing, a greater proportion of the borough's population will be positioned to access housing.
- 5.2.4. Social value contributions under this theme are anticipated to have positive impacts. By offering skills and employment workshops as well as further education bursaries, young people will be better equipped to access higher paid jobs into the future, especially those care leavers who may have experienced disruption to their education in earlier years. Social

value contributions also include the adoption of gender inclusive design and the creation of safer spaces, which will be of particular benefit to women and girls.

- 5.2.5. Climate change mitigation is indirectly evident in the NLP's commitment to encouraging active travel and using sustainable delivery methods.

Delivering the Local Plan Assessment

- 5.2.6. The summary of the assessment of the delivering the Local Plan policies on each determinant of health has been detailed below:
- 5.2.7. **Air Quality:** The Council will support developments with reduced negative impacts on air quality. Equally, all construction sites in the borough will be expected to meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice in relation to dust and air quality. Efforts to improve air quality throughout the borough will be beneficial to all social groups, particularly to older people, infants and those with long term health conditions, who are the most likely to be vulnerable to the effects of air pollution.
- 5.2.8. **Noise:** The Council will support developments with reduced negative impacts on noise and vibration. However, increased construction of multiple types of developments across the borough, as set out in the NLP, will likely contribute greatly to overall noise pollution. Increased noise has the potential to adversely affect the tranquillity of the borough.
- 5.2.9. **Housing and Homelessness:** The NLP identifies a range of sites across the borough with which to address the overall demand for housing. Within this, the provision of affordable housing is a key component of the NLP. Policy DV5: Developer contributions ensures developers maximise contributions towards the delivery of affordable housing. This will be mostly beneficial for **low-income** and **unemployed** groups.
- 5.2.10. **Economy and employment:** A key component of the NLP is its promotion of the boroughs thriving economy through continual job creation, job diversification, and employment-led development. The policies under this theme support a range of employment accommodation types in order to diversify the economy and provide small businesses with the space to thrive within the borough. The use of windfall sites will also have the potential to make a significant contribution to the supply of employment land in the borough. Potential social value contributions through Policy DV6 importantly include offering skills and employment workshops for local residents. This is particularly beneficial for **younger residents** seeking employment, especially those **leaving care** who may have experienced disruption to education in their earlier years.
- 5.2.11. **Skills and Education:** Social value contributions through this policy might include helping young people by offering higher education bursaries and skills and employment workshops for a wider group of local residents. This is particularly beneficial for younger residents seeking employment, especially those leaving care who may have experienced disruption to education in earlier years. This may also benefit low income groups who might be seeking to upskill through the provision of bursaries.

- 5.2.12. Skills and Education: Social value contributions through this policy might include helping young people by offering higher education bursaries and skills and employment workshops for a wider group of local residents. This is particularly beneficial for **younger residents** seeking employment, especially those **leaving care** who may have experienced disruption to education in earlier years. This may also benefit **low income groups** who might be seeking to upskill through the provision of bursaries.
- 5.2.13. **Social Cohesion and Community Safety:** The council will promote the development of community services themselves as well as community usage of town centres which act as important spaces for socialisation. Under this theme, opportunities to maximise the delivery of social value to positively contribute community benefits is also supported. This includes supporting community organisations which bring about improvements to social wellbeing. Improved social cohesion amongst the community is particularly beneficial to those who are **socially isolated**, including **new and expectant mothers**.
- 5.2.14. Use of the Tower Hamlets Code of Construction Practise is required by Policy DV4: Planning and construction of new development. Through this, the health, safety and wellbeing of the boroughs residents and businesses are protected. Social value contributions under this theme also include the adoption of gender inclusive design and creation of safer spaces, which will be of particular benefit to **women and girls**.
- 5.2.15. **Access to Services:** The policies outlined within this theme positively contribute to Access to services throughout the borough. The design of the built environment to include the provision of accessible services will directly contribute to reducing inequalities (including health inequalities) which is especially beneficial to **older people, people with disabilities, people with long term health conditions** and **low-income** groups.
- 5.2.16. **Physical Activity:** Development proposals under this theme are required to provide healthy environments, including facilitating physical activity and promote physical and mental wellbeing for all residents. Policy DV3 in particular aims to provide high-quality open spaces, culturally sensitive community facilities, and an equitable urban realm that supports walking, wheeling, and other forms of active travel. This will benefit all groups.
- 5.2.17. **Green Infrastructure:** Policy DV3 in particular aims to provide high-quality open spaces and an equitable urban realm that supports walking, wheeling, and other forms of active travel. This is likely to help to increase the provision of green infrastructure which will benefit all residents and generates significant environmental benefits throughout the borough, as well as contributes to other determinants such as climate change resilience.
- 5.2.18. **Climate change resilience:** Social value contributions under this theme include mitigating climate change through all aspects of the development, not just the built form. Climate change mitigation is indirectly evident in the NLP's commitment to encouraging active travel and using sustainable delivery methods.

Table 5-1 – Delivering the Local Plan Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
DV1	0	-	+	+	+	+	+	+	+	+	+ Children and younger people Low income groups - Children and younger people Older people	None identified
DV2	+/-	+/-	+	+	+	+	+	+	+	+	+ / - Older people Children and younger people People with existing health conditions Socially excluded or isolated groups.	None identified
DV3	0	0	+	+	+	+	+	+	+	+	+ People with existing health conditions Socially excluded or isolated groups	None identified
DV4	+	+	0	+	0	+	0	0	0	+	+ People with existing health conditions Socially excluded or isolated groups	None identified
DV5	0	0	+	0	0	+	+	0	0	0	+ Low-income and unemployed	None identified
DV6	0	0	+	+	+	+	+	0	0	+	+ Socially excluded or isolated groups	Social value contributions would be enhanced through specific implementation of plans to encourage communities

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Low-income and unemployed	meaningful engagement in local and regional decision-making.
DV7	0	0	0	+	0	0	0	0	0	+	+ Older people People with disabilities and mobility impairment People with existing health conditions	None identified
DV8	0	0	+	0	0	+	+	0	+	0	+ Older people Children and young people, Socially excluded or isolated groups	None identified

5.3 Homes for the Community

Assessment Summary

- 5.3.1. The assessment identified the following social groups that could be affected by Homes for the Community policies:
- Families with children
 - Older people;
 - People with disabilities and mobility impairment;
 - Homeless people;
 - Students;
 - Gypsies and travellers;
 - Low-income groups; and
 - Socially isolated groups including new and expectant mothers.
- 5.3.2. The Homes for the Community policies aim to ensure the protection and enhancement of existing housing stock, the provision of a range of new housing, and an assurance of high-quality design and execution throughout the borough. This theme is anticipated to bring about a high degree of positive effects across numerous social groups.
- 5.3.3. . The requirement of development proposals to maximise the delivery of affordable homes under this theme will be especially beneficial to the health and wellbeing of low-income groups who are reliant on affordable housing. In particular, family-sized affordable housing as set out by this policy will bring about positive health benefits for families with children throughout the borough. The provision of specialist housing is beneficial to the homeless, older people and people with disabilities or mobility impairments who require supported living for their physical or mental wellbeing.
- 5.3.4. Social cohesion is highly supported by this theme. Regeneration as well as new provision is required to provide residents with a high-quality built environment, including access to community facilities. This is emphasised under specialist housing, with integration of residents into the wider community being a key focus of the policy. Greater opportunities for socialisation under this theme will improve the health and wellbeing of residents. Community safety is also a key consideration and will be considered upon the enhancement and provision of housing throughout the borough.
- 5.3.5. The appropriate locating of student accommodation in close proximity to higher education institutions increases the boroughs walkability for the student population. Shorter commuting distances will encourage the uptake of active travel, which will boost exercise levels and overall physical and mental wellbeing for this population group.

Homes for the Community Assessment

- 5.3.6. The summary of the assessment of the Homes for the Community polices on each determinant of health has been detailed below.
- 5.3.7. **Air quality:** Additional housing in LBTH could result in a higher number of cars on the borough's roads, which could contribute to a worsening of air quality, particularly given a borough-wide Air Quality Management Area (AQMA) is already in place. Temporary worsening of air quality may occur during construction through dust and plant emissions. Negative air quality effects are likely to affect Children and young people, older people and people with disabilities or mobility impairment.
- 5.3.8. **Noise:** Policy HF7: Purpose-built student accommodation could have a negative effect on the amenity of the local neighbourhood including increased noise levels. Similarly, high-density large-scale purpose built shared living developments as proposed by this theme could have impacts on their surrounding communities in terms of noise. The policy mandates that development proposals for student accommodation and high-density large-scale purpose built shared living developments will be required to demonstrate how matters of increased noise levels have been addressed through the management of the facility.
- 5.3.9. Any adverse impacts on noise pollution as a result of policies under this theme would have negative effects on the health and wellbeing of the general population. Conversely, new housing of over 10 residential developments will be located so as to minimise exposure to noise pollution. Reduced exposure to noise pollution would have beneficial health effects for residents.
- 5.3.10. **Housing and Homelessness:** This theme identifies a range of policies targeted towards housing and homelessness in the borough. The theme is specifically geared towards regenerating and protecting existing housing stock, as well as providing a range of new housing including affordable housing, shared living buildings, purpose-built student accommodation and specialist housing to meet the rising housing demands in the borough, and ensuring high standards of living for all.
- 5.3.11. HF3 focuses on current housing, stating that development proposals resulting in the net loss of residential floorspace will not be supported. The protection and enhancement of existing residential spaces in the borough will be beneficial to the general population. Opportunities to improve housing through regeneration schemes including improving access to open space and enhancing connectivity and safety in neighbourhoods will improve the overall health and wellbeing of current and future populations in the borough.
- 5.3.12. The theme also sets out to meet the growing demand for housing through new provision. Within this, a range of accommodation types are supported. HF4 focuses on development proposals for new specialist and supported housing. This will be particularly beneficial for **older people** and **people with disabilities** or **mobility impairment** who often require supported living. The specialist care needs of the homeless are also considered here

through the provision of **homeless** shelters and transitional housing for those experiencing homelessness.

- 5.3.13. HF2 targets affordable housing, stating that development proposals will be required to maximise the delivery of affordable homes. This policy will have positive impacts for low-income groups in the borough whose health and wellbeing are likely dependent on affordable housing. A sub-policy presented here is the requirement for family-sized affordable housing, which will also be beneficial **for families with children**. In particular, family sized housing for **low-income families** is a pressing requirement throughout the borough, and one which is a key consideration of this policy. Similar to this is the provision of Houses of Multiple Occupancy (HMO); HMOs typically are lower cost as residents make use of shared facilities and so are eligible for a shared room rate benefit. This will also bring positive health impacts to **low-income groups**.
- 5.3.14. Appropriate location of new student accommodation is considered here too, with policies ensuring walkability for **students** to their institution which will be beneficial to the student populations overall physical wellbeing. There is potential for disruption to existing residents through noise pollution as a result of new purpose built student accommodation. **Gypsies and Travellers** are also considered under this theme through safeguarding of the existing gypsy and traveller site at Old Willow Close.
- 5.3.15. Finally, the theme outlines requirements for housing standards and quality. By ensuring a certain degree of quality (including minimised exposure to noise and air pollution, exposure to sunlight and adequate amenity space) the policy supports the overall health and wellbeing of the population.
- 5.3.16. **Economy and employment:** The policies outlined within Homes for the Community are unlikely to directly impact upon Economy and employment within LBTH. The delivery of a significant amount of student housing under this theme may compromise the Council's ability to deliver other priorities, including employment space provision. Despite this the delivery of student accommodation will be done so recognising the positive impacts it brings to the communities and the borough's local economy.
- 5.3.17. **Skills and education:** The policies outlined within Homes for the Community are unlikely to directly impact upon Skills and education within LBTH. By supporting the educational attainments of students from the borough and providing affordable student housing accommodation, a greater proportion of residents will be able to gain skills in order to access better jobs into the future, earning a higher income and gaining an improved standard of living which will in turn generate positive effects for health and wellbeing.
- 5.3.18. **Social cohesion and community safety:** Under this theme, a sense of community belonging, and social interaction is promoted through the enhancement of existing housing and provision of new housing. Development proposals for affordable housing are required to provide residents with a high-quality built environment, including the provision of community facilities.

- 5.3.19. A sub-policy of HF4 on specialist housing is the integration of residents into the surrounding community. Specific focus on the opportunities for socialisation by groups in needs of specialist housing like the homeless, older people, people with disabilities and mobility impairments will make significant improvements to their quality of living and general wellbeing. The policy aims to incorporate where practical, small-scale community and town centre uses within the development proposal for specialist housing. Such components can improve the health and well-being of residents as they offer opportunity to play an active role in their community through continued interaction with the surrounding community.
- 5.3.20. Community safety is also a key consideration of this theme. In line with the housing standards and quality set out under this theme all new provision of housing will be built to ensure safety and surveillance.
- 5.3.21. **Access to services:** The policies outlined within this theme positively contribute to access to services throughout the borough. Policies ensure that residents in affordable housing, specialist housing and purpose-built student accommodation will experience the same degree of accessibility to local services as existing housing in the borough. Increased population in the borough through the provision of new housing under this theme may put pressure on existing services. The increased demand on services may have an adverse effect on the health and wellbeing of the population.
- 5.3.22. **Physical activity:** By considering appropriate locations for student accommodation within the borough the policy aims to improve walkability for students. Residing only a short walking distance from a further or higher education institution will likely encourage the uptake of active travel. Higher levels of physical exercise will boost the overall physical and mental wellbeing of this population. Relating to specialised housing, the policy states that where mobility is limited, development proposals should be located within 5 minutes walking distance of amenities including local shops, services and community facilities so that residents can continue to engage in physical exercise within their local community. Walkability here will again bring about improvements to the overall physical and mental wellbeing of residents.
- 5.3.23. **Green Infrastructure:** The policies outlined within Homes for the Community are unlikely to directly impact upon Green Infrastructure within LBTH.
- 5.3.24. **Climate change resilience:** Policy HF9 recognises the need for homes to be able to adapt to climate change without the need for mechanical cooling. This will be particularly beneficial to low-income groups who are likely to be positioned as unable to afford the necessary energy costs for this type of in-home cooling.

Table 5-2 – Homes for the Community Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
HF1	-	-	+	0	0	0	0	0	0	0	+ Low income groups Younger people Older people People with disabilities and mobility impairment People with existing health conditions Socially excluded or isolated groups (Gypsies and travellers) - Children and younger people Older people People with existing health conditions	Increased demand on services throughout the borough as a result of the growing population will require the strengthening of services. This should take the form of provision of new facilities as well as the employment of additional staff.
HF2	0	0	+	0	0	0	0	0	0	0	+ Low income groups	None identified.
HF3	0	0	+	0	0	0	0	0	0	0	No specific groups have been identified.	None identified
HF4	0	0	+	0	0	+	+	0	0	0	+ Older people People with disabilities and mobility impairment	None identified
HF5	0	0	+	0	0	0	0	0	0	0	+ Socially excluded or isolated groups (Gypsies and travellers)	Appropriate sites may need to be identified within or outside the borough as avoid illegal sittings. If new sites outside the borough are required, the council may

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
												need to work with adjoining boroughs to deliver them. LBTH are currently awaiting the outcomes of the Greater London Authorities Gypsy and Traveller Accommodation Needs Assessment
HF6	0	0	+	0	+	+	+	0	0	0	+ Younger people (students) Low-income groups (students) Socially excluded or isolated groups (care leavers)	All purpose-built student accommodation should have a noise nuisance curfew in place between 11pm and 7am. This should be communicated to all new residents upon the start of their tenure as well as potential penalties they could face in instances of breaking the curfew.
HF7	0	0	+	0	0	+	+	0	0	0	+ Low-income groups People with disabilities and mobility impairment	None identified.
HF8	0	0	+	0	0	+	0	0	0	0	+ Low-income groups	None identified
HF9	0	0	+	0	0	+	0	0	0	+	+ Children and younger people People with disabilities and mobility impairment Low-income groups	None identified

5.4 Clean and Green Future

Assessment Summary

- 5.4.1. The assessment identified the following social groups that could be affected by Clean and Green Future policies:
- Infants/children and young people including care leavers;
 - Older people;
 - People with long term health conditions; and
 - Low-income groups.
- 5.4.2. In general, Clean and Green Future results in positive impacts upon health determinants. There are a number of resulting beneficial health effects, particularly upon older people, infants, children and young people including care leavers, people with long term health conditions and low-income groups.
- 5.4.3. Clean and Green Future policies provide positive impacts upon air quality within the borough, benefitting all residents. The improvement of air quality can have particularly beneficial effects for older people, infants, and those with long term health conditions. The reduction in emissions to air including construction related emissions, such as PM₁₀ and PM_{2.5}, as well as the new provision of energy efficient buildings will improve physical health and wellbeing throughout the borough. Similarly, reductions in noise brought about by the proposed policies will contribute positively to the wellbeing of borough residents.
- 5.4.4. This theme of policies also aims to mitigate the risk of flooding and overheating as part of the wider improvements to the boroughs overall climate change resilience. Improved flooding resilience will ensure the preservation of housing and developments in the borough for those living in high-risk flooding areas. These impacts will also positively affect those living in flood zones. Additionally, avoidance of overheating in building design will be beneficial to the health and wellbeing of residents and building users in the borough, as well as positively contribute to the future housing stock of the borough.

Clean Green Future Assessment

- 5.4.5. The summary of the assessment of the Clean Green Future policies on each determinant of health has been detailed below.
- 5.4.6. **Air Quality:** The association between health effects and exposure to air pollutants is now well established, with distinct health risks associated with exposure to particulates available at a local level. Older people, infants, and those with long term health conditions, are the most likely to be vulnerable to the effects of air pollution.
- 5.4.7. Policy CG6 specifically addresses Air Quality within LBTH, outlining measures for the mitigation and improvement of poor air quality in the borough. Specifically, the policy supports the implementation of an air quality positive approach in line with the Air Quality Positive LPG (2023) for all major developments. All other development proposals are required by the policy to meet or exceed the 'air quality neutral' standard. This also includes

the promotion of low or zero emission transport usage and reducing the reliance on private motor vehicles. Where an air quality assessment indicates potential adverse impacts on air quality, development will be resisted unless mitigation measures are put forward.

- 5.4.8. A number of policies within the Clean and Green Future package also contribute to maintaining, and improving, air quality throughout LBTH. CG2, CG3, and CG4 focus on the provision of energy efficient buildings. Residents' health will be improved as a result of these policies due to a reduced exposure to air pollutants. The anticipated beneficial effects of these policies are most likely to be felt in areas of low-income, in population groups with long term health conditions, older populations, and younger populations, particularly in wards in the north of the borough. Improvements to the public realm through reductions in air pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.
- 5.4.9. The development and introduction of these policies is likely to improve the air quality within the borough and minimise the negative effects upon those in the most vulnerable social groups.
- 5.4.10. **Noise:** The NLP will aid in reducing noise and vibration. Policy CG10: Noise and Vibration, outlines the criteria for new developments and noise as well as efforts to manage existing noise sources. This policy will result in the reduction of noise and vibration attributed to new and existing developments throughout the borough, reducing the levels of nuisance felt to those living in close proximity to developments and existing noise sources, as well as positively contributing to the tranquillity of the borough.
- 5.4.11. **Housing and Homelessness:** The Policies outlined within Clean and Green Future are unlikely to directly impact upon homelessness within the borough. Potential beneficial impacts to housing will result from the improvement of the boroughs housing stock through policies CG2, CG3 and CG4. Their focus on the provision of energy efficient buildings and associated energy savings for current and future residents will work to reduce costs and support better quality housing stock for the borough's population.
- 5.4.12. **Economy and employment:** Policies proposed within the NLP's Clean and Green Future will contribute to a circular economy within the borough, with new developments aligned with circular economy principles. In particular, CG4: Embodied carbon, retrofit and circular economy requires major development proposals to assess whole lifecycle carbon emissions using the methodology set out in the London Plan (2021) and Whole Lifecycle Carbon Assessment LPG (2022). This will help to protect the borough for the future through limiting waste, air pollution, and emissions.
- 5.4.13. With a higher rate of unemployment than the region and England, design requirements as part of the Clean and Green Future policies could indirectly result in job opportunities in the borough, particularly within the construction and renewable energy sectors. Jobs in construction are especially accessible to young people with low skill and education levels, including care leavers who may have experienced disruption to their education in earlier years.

- 5.4.14. Skills and education The policies outlined within Clean and Green Future are unlikely to directly impact upon skills and education within LBTH.
- 5.4.15. **Social cohesion and community safety:** The policies outlined within Clean and Green Future are unlikely to directly impact upon social cohesion and community safety within LBTH.
- 5.4.16. **Access to services:** The policies outlined within Clean and Green Future are unlikely to directly impact upon access to services within LBTH.
- 5.4.17. **Physical activity:** The rate of obesity within adults in LBTH is lower than both London and England averages. The proposed policies are not anticipated to have a direct impact on physical activity in the borough. There are potential positive cumulative improvements to biodiversity, in conjunction with biodiversity and open space policies. Improved biodiversity and open space will likely encourage borough physical activity outdoors to an improvement public realm and green spaces.
- 5.4.18. Green Infrastructure Clean and Green Future will likely involve the use of green infrastructure methods which will preserve and improve infrastructure for the borough, bringing about positive impacts. Specifically, the first item in the London Plan cooling hierarchy that is to be implemented throughout the borough is the provision of green infrastructure. Doing so generates significant environmental benefits, as well as contributes to other determinants such as climate change resilience.
- 5.4.19. **Climate change resilience:** There are numerous impacts of climate change, both acute and chronic, that may be felt within LBTH. Most notably, the London-wide vulnerability mapping (2020) indicates that Tower Hamlets is at an increased risk of overheating as a direct result of climate change. Overheating can cause significant discomfort to residents and building users and is particularly detrimental to Older people.
- 5.4.20. Policy CG5 is targeted towards overheating, ensuring that development proposals are designed with a view to avoid overheating and excessive heat generation, whilst also minimising the need for internal mechanical cooling systems. However, this only accounts for new developments, leaving those in existing properties vulnerable to climate change events.
- 5.4.21. Multiple Clean and Green Future proposed policies also address plans to limit and reduce the carbon emissions of the borough, aiming to limit further damage to the climate as a result of developments within the area. This will not only improve climate resilience but also contribute towards improved air quality which is beneficial for the overall health of residents throughout the borough.

Table 5-3 – Clean and Green Future Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
CG1	+	0	0	+	0	0	0	0	+	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
CG2	+	0	+	0	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
CG3	+	0	+	0	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified.
CG4	+	0	+	+	0	0	0	0	0	+	+ Older people Children and young people People with existing health conditions +/- Low income groups	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers. Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
CG5	+	+	+	0	0	0	0	0	0	+	+Older people	None identified

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Children and young people People with existing health conditions Low income groups	
CG6	0	0	0	0	0	0	0	0	0	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
CG7	0	0	0	0	0	0	0	0	+	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
CG8	0	0	0	0	0	0	0	0	0	+	This policy will bring about benefits for the entire borough community. No specific groups have been identified.	None identified
CG9	+	+	0	0	0	0	0	+	+	+	+ Older people Children and young people People with existing health conditions Low income groups	None identified
CG10	0	+	0	0	0	0	0	0	0	0	+ Older people Children and young people People with existing health conditions Low income groups	None identified
G11	0	0	0	0	0	0	0	0	0	0	No specific groups have been identified.	None identified

5.5 People, Places and Spaces

Assessment Summary

- 5.5.1. The assessment identified the following social groups that could be affected by the People, Places and Space theme policies:
- Infants/children and young people;
 - Older people;
 - People with long term health conditions;
 - Women and girls;
 - Unemployed and low-income groups; and
 - Mothers and caregivers.
- 5.5.2. The policies proposed within the People, Places and Spaces theme have the potential to result in positive health effects upon multiple social groups, primarily through improving the quality of housing provision within LBTH. Improved quality of housing as well as associated access to open space will contribute positively to the physical health and wellbeing of the LBTH population. Additionally, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions.
- 5.5.3. The theme also aims to improve the provision of appropriate facilities for residents and the wider community. Improved access to services will improve the health and wellbeing of older residents and contribute towards reducing loneliness.
- 5.5.4. This theme has a strong focus on generating adequate housing provision for the borough, with specific reference to housing affordability, including in the form of tall buildings. This policy could result in positive impacts upon housing and homelessness in LBTH, improving the availability of community housing for those on low-incomes, or who are homeless.
- 5.5.5. The affordability of community housing within LBTH may not be truly affordable for those who are currently homeless or on very low-incomes, and therefore some beneficial effects may be limited in their distribution.

People, Places and Spaces Assessment

- 5.5.6. The assessment of the People, Places and Spaces policies against each of the key determinants of health have been outline below.
- 5.5.7. **Air Quality:** The association between health effects and exposure to air pollutants is now well established, with distinct health risks associated with exposure to particulates at a local level²². Older people, infants, and those with long term health conditions are the most likely to be vulnerable to the effects of air pollution.
- 5.5.8. Urban greening as encouraged by policy PS2: Tall Buildings, will help to support air purification and dust suppression which could help to reduce the levels of air pollution within the borough. Additionally, the retrofitting of heritage assets as outlined in PS6: Heritage and

the Historic Environment, to achieve greater energy efficiency will do so in line with the Council's policies on improved air quality. Improvements to the public realm through reductions in air pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.

- 5.5.9. The significant scale of construction activities occurring simultaneously as a result of the development proposed under this theme will likely generate short-term noise and air pollution. Dust and emissions created from construction will be damaging to the health of vulnerable residents including older people, infants and those with long term health conditions.
- 5.5.10. **Noise:** The policies support of new and higher standard housing will result in increased levels of residential occupation and the associated increase in ambient noise levels. Additionally, construction related noise from new housing developments may negatively impact upon the tranquillity and consequent physical and mental health of residents in the borough. Policy PS3: Securing Design Quality, aims to offset these likely impacts by ensuring developments do not result in unacceptably harmful impacts arising from noise pollution and their subsequent harmful effects on human health.
- 5.5.11. **Housing and Homelessness:** This theme of policies has a strong focus on the provision of housing within the borough. Policy PS2: Tall Buildings, aims to positively contribute to meeting the borough's high housing targets in a way that meets the needs of those requiring affordable housing.
- 5.5.12. Policy PS3 (Securing Design Quality), mandates that the highest standard of design is met by all new developments, ensuring the quality of new housing as well as the quantity assured by PS3. However, improvements made to housing quality will apply to new residential developments only. This means that existing homes, particularly community housing, will not necessarily see improvements of the same scale, limiting the distribution of beneficial effects. This will adversely impact low-income groups who live in community housing and cannot afford to make improvements to their home independently.
- 5.5.13. The policy does not specifically target homelessness, although there is a likely positive effect on homelessness as a result on increased provision of affordable housing.
- 5.5.14. **Economy and employment:** Policy PS9: Shopfronts, outlines the need for active shopfronts which will help to improve the economic diversity within the borough, supporting the strength of the local economy. The policies outlined within this theme are unlikely to directly impact upon employment within LBTH.
- 5.5.15. **Skills and education:** The policies outlined within this theme are unlikely to directly impact upon Skills and Education levels within LBTH.
- 5.5.16. **Social cohesion and community safety:** According to the IMD for crime , of LBTH's 144 LSOA's, 44 are within the 30% most deprived. These LSOA's are located predominantly in the north of the borough. Improvements to the public realm including housing within LBTH, as proposed under this theme, are likely to improve social cohesion and community safety

in the borough for all residents. The provision and enhancement of community facilities such as community hubs will provide spaces for members of the community to come together and socialise, including cross-cultural engagement. The policy also states that facilities such as open space should be designed in collaboration with the local community in order to meet their needs for sociability. Gender inclusive design in line with this theme will also aid in encouraging women and girls to engage with socialisation spaces as a result of their improved feelings of safety within them.

- 5.5.17. **PS4: Attractive Streets, Spaces and Public Realm**, encourages new developments to embed principles of 'Secured by Design'. The policy mandates developers should refer to crime prevention and security guidance to ensure all risk is mitigated. Policy PS5: Gender Inclusive Design, will work to ensure mothers and caregivers have access to facilities to be able to meet and socialise outdoors in a safe and social setting.
- 5.5.18. Gender is also considered in relation to the safety of women at night, ensuring routes are well-signed and appropriately lit to foster feelings of safety in the space. The improvement of women's safety will work to relieve feelings of stress and unease for women when moving through spaces, positively contributing to the mental wellbeing of female residents in the borough.
- 5.5.19. **Access to services:** PS4: Attractive Streets, Spaces and Public Realm aims to improve the provision and accessibility of appropriate facilities for residents and the wider community. Improved access to services such as healthcare services will improve the overall physical and mental health of older people, as well as contributing to reductions in loneliness experienced by older residents in the borough. Improvements to services and access to them is particularly important to the Bangladeshi community within the borough, whose responses within the Healthwatch Tower Hamlets Survey showed that this group sought a prioritisation of improved services and activities for young people, access to a place of worship, access to healthy eating programmes and public transport facilities like bus stations .
- 5.5.20. **Physical activity:** The development of new housing, especially tall buildings, within the NLP is required to provide high quality private communal open space. Access to open space will encourage and enable improvements in physical activity levels within the borough, leading to a potential reduction in incidents of obesity and the proportion of residents who are overweight. These positive effects could potentially impact across all demographic groups.
- 5.5.21. **Green Infrastructure:** Numerous proposed policies in this theme will positively contribute to green infrastructure in the borough, predominantly through the provision of open space and urban greening in association with new housing. Improvements to the public realm through additional green spaces can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.

- 5.5.22. **Climate change resilience:** During the construction of new housing developments, emissions from vehicles and construction plant may be higher and therefore adversely affect the climate.
- 5.5.23. The resilience of new housing developments to climate change factors such as heat and flooding will have beneficial contributions to the boroughs climate resilience. This is due to the policies of building requirements to reduce overheating in the borough as well as the requirement to put forward flood risk mitigation upon development. Improvements made to housing through prevention of overheating and implementation of cooling systems will be particularly beneficial to older people and people with long term health conditions.
- 5.5.24. Additionally, the retrofitting of heritage assets as outlined in PS6, Heritage and the Historic Environment, to achieve greater energy efficiency will do so in line with the council's policies on climate change, positively contributing to climate change resilience in the borough.

Table 5-4 – People, Places and Spaces Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
PS1	+/-	+/-	+	0	0	+/-	0	0	+	0	- Socially excluded or isolated groups + Children and young people Older people Socially excluded or isolated groups	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
PS2	+/-	-	+	0	0	+/-		0	0	0	- Socially excluded or isolated groups People with disabilities and mobility impairment	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users. Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
PS3	+/-	+/-	+	0	0	0	+	+	+	+	+ Children and young people Older people People with existing health conditions - Low-income groups	Securing design quality should not come at the expense of affordable housing, in order that first time buyers and those on lower incomes remain able to buy into the property market and not be priced out, or not have access to quality development.
PS4	+	0	0	0	0	+	+	+	+	+	No specific groups identified	Street features and public realm that are frequented by vulnerable groups such as children and low-income groups should consider avoiding locating nearby

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
												advertisement content including hot food takeaway and betting.
PS5	0	0	0	0	0	+	+	+	0	0	+ Socially excluded or isolated groups (Women and girls, LGBTQ+ community and ethnic minority groups) Older people Children and young people	The policy might encourage business and facilities to open up in parks as well as ensure active travel routes increase the busyness of parks in order to minimise idle parks that promote fear in women.
PS6	0	0	+	0	0	+	0	0	0	0	+ Older people People with disabilities and mobility impairment	None identified
PS7	0	0	0	0	0	+	0	0	+	0	+ Older people People with disabilities and mobility impairment	None identified
PS8	0	0	0	0	0	+	0	0	0	0	No specific groups identified.	None identified
PS9	0	0	0	+	0	+	0	0	0	0	+ Older people People with disabilities and mobility impairment	Shopfronts can act as key sites of sensory overload for the neurodivergent population of the borough. Enhancement of appearance to shopfronts should consider potential adverse effects on neurodivergent people.
PS10	0	0	0	+	0	+	0	0	0	0	+/- Older people	Advertisement content including hot food takeaway and betting should consider placement away from areas where

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											People with disabilities and mobility impairment Children and young people (School age)	vulnerable groups such as children and low-income groups may frequent. Appropriate positioning of advertisement and signage to ensure accessibility for disabled groups in public spaces should be considered.
PS11	0	0	0	0	0	0	0	0	0	0	No specific groups identified.	None identified

5.6 Inclusive Economy and Good Growth

Assessment Summary

- 5.6.1. The assessment identified the following social groups that could be affected by the Employment and Economic Growth theme policies:
- Young people including care leavers;
 - Elderly;
 - Mothers and caregivers; and
 - Unemployed and low-income groups.
- 5.6.2. This theme of policies focuses on the support and enhancement of economic growth across the borough. This is predominantly put forward through the protection of existing employment spaces, and creation of new spaces, including affordable ones.
- 5.6.3. The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough's employment spaces. The designation of Strategic Industrial Locations will protect existing spaces of economic activity and allow the borough to maintain its position as a global economic hub. Equally, any development that will result in the direct loss of employment floorspace within these strategic industrial locations will not be supported under this theme. New employment spaces are also covered by this theme, with affordability of commercial space being a key requirement to this. Affordability is anticipated to allow the emergence of a wider range of economic sectors in the borough.
- 5.6.4. The policy also supports the provision of education and upskilling opportunities throughout the borough. In doing so the current skills gap amongst the working population will likely diminish and a wider range of jobs will be accessible to a greater proportion of the population.
- 5.6.5. New developments are not yet required to respond to the future climate needs of the borough. Flooding and overheating are not considerations of new employment space development and so the risk of such events is not mitigated through this theme.

Inclusive Economy and Good Growth Assessment

- 5.6.6. The assessment of the Inclusive Economy and Good Growth policies against each of the key determinants of health have been outline below.
- 5.6.7. **Air Quality:** The policies included within the Economy and Town Centres theme are unlikely to have a direct impact on air quality within LBTH. The intensification of industrial uses in the borough could lead to more HGV trips on local roads, leading to increased air pollution. This would bring adverse effects to the overall health and wellbeing of all borough residents.
- 5.6.8. **Noise:** Policy EG2: New Employment Spaces, seeks to ensure that new employment development does not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.

- 5.6.9. **Housing and Homelessness:** Policy EG1: Creating Investment and Jobs aims to support mixed-use development which could include residential development. This will help to increase the provision of housing in the borough however, this policy does not mention the affordability of these homes or the quantity to be made available. Through the safeguarding of land for employment uses, residential development will be hindered in areas of the borough due to this policy.
- 5.6.10. **Economy and employment:** Policy EG1: Creating Investment and Jobs, supports development proposals which provide employment opportunities. The policy also mandates that a range of job opportunities at all levels will be accessible across the borough. A range of job opportunities is particularly beneficial to young people with low skill and education levels, including care leavers who may have experienced disruption to education in their earlier years.
- 5.6.11. Employment spaces are also considered under this theme, with existing designated employment locations being protected and the provision of additional employment floorspace encouraged, including the provision of affordable commercial space. Developments that will result in the direct loss of employment floorspace within strategic industrial locations will not be supported by the council under this theme.
- 5.6.12. All policies under this theme are aimed towards supporting and promoting successful and sustainable economies in Tower Hamlets, as well as protecting the borough’s global, national and local economic role in delivering jobs and supporting businesses. The protection of existing strategic industrial locations will support the long term position of the borough as a global economic hub. Additionally, by supporting and promoting a range of new employment spaces including affordable ones, the policy also supports new and emerging economic sectors.
- 5.6.13. **Skills and education:** Policy EG1: Creating Investment and Jobs aims to support the generation of employment opportunities by closing the current skills gap amongst the working population through improving access to education and training. Additionally, the requirement for affordable commercial space under this theme is intended to support educational outcomes through connections to schools, colleges and higher education. This policy’s intended provision of upskilling and education opportunities is particularly beneficial to young people with low skill and education levels, including care leavers who may have experienced disruption to education in earlier years.
- 5.6.14. **Social cohesion and community safety:** The railway arches in Tower Hamlets are a key component of the culture and community of the borough. Policy EG5: Railway Arches, seeks to retain those railway arches in uses that make a positive contribution to the community. Specifically, the policy supports development proposals involving railway arches where the principle use is for the community. Policy EG6: Data centres aims to ensure sufficient broadband capacity to serve all residents. Where broadband has previously been insufficient, this policy will bring about alternative forms of social cohesion as digital connectivity will be enhanced throughout the borough. This could be especially beneficial to

the mental wellbeing of elderly people who might suffer from social isolation and loneliness though such a benefit is reliant on a degree of digital literacy amongst this population group.

- 5.6.15. **Access to services:** Those who commute to work via cycling are supported by policy EG3: Affordable workspace through its provision of end-of-trip facilities in workplaces. This may be particularly beneficial to low-income groups who may find cycling to work to be an economically efficient and therefore preferable method of transport.
- 5.6.16. New employment spaces should provide a range of shared services and appropriate facilities such as communal breakout spaces, kitchen areas, showers and childcare facilities. This policy will be beneficial to a range of groups. Low-income groups who might cycle to work for economic efficiency will benefit from shower facilities, as well as kitchen spaces that will allow them to bring food prepared at home rather than purchase food at work to keep costs down. Equally, mothers and caregivers will benefit from the provision of childcare facilities.
- 5.6.17. **Physical activity:** The policies outlined within this theme are unlikely to directly impact upon physical activity levels within LBTH. Provision of shower facilities in new workspaces under this theme may encourage active transport to work, including cycling, or participation in exercise during breaks (e.g. going for a run at lunchtime) which would improve the overall physical health of those workers engaging in these activities.
- 5.6.18. **Green Infrastructure:** The policies outlined within this theme are unlikely to directly impact upon green infrastructure within LBTH.
- 5.6.19. **Climate change resilience:** The construction and operation of new employment spaces will adversely impact climate in the borough, contributing to overall GHG emissions. Additionally, there is no reference to climate change factors like flooding and overheating in relation to the development of new employment spaces under this theme, and so resilience of such spaces to climate change will be minimal. This could have an adverse impact on residents and workers in the borough.

Table 5-5 – Inclusive Economy and Good Growth Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
EG1	0	-	+	+	+	0	+	0	0	-	+ Low-income groups Younger people - Older people Children and young people People with disabilities and mobility impairment	None identified.
EG2	+/-	+/-	0	+	0	0	+	0	0	-	+ Low-income groups People with disabilities and mobility impairment - Older people Children and young people People with disabilities and mobility impairment	New employment spaces should be a diverse mix of office space and spaces for small businesses to thrive. Economic prosperity and good health outcomes are inextricably linked. Providing a range of business types can provide employment opportunities to a wider range of population groups whose health would benefit from being employed.
EG3	0	0	0	+	+	0	+	0	0	0	+ Low income groups	None identified
EG4	0	0	0	+	0	0	+	0	0	0	+ Low income groups	None identified
EG5	0	0	0	+	0	+	+	+	0	0	No specific groups have been identified.	None identified.
EG6	0	0	0	+	0	0	0	0	0	0	No specific groups have been identified.	None identified

5.7 Town Centres

Assessment Summary

- 5.7.1. The assessment identified the following social groups that could be affected by Town Centres policies:
- Young people including care leavers;
 - Older people;
 - People with disabilities;
 - Women and girls;
 - New and expectant mothers
 - Unemployed and low-income groups; and
 - Socially excluded or isolated groups.
- 5.7.2. The policies outlined within the Town Centres theme are likely to have mixed impacts upon the selected health determinants. These impacts are likely to be predominantly positive, with positive effects expected for young people including care leavers, older people, new and expectant mothers, women and girls, people with disabilities, low-income and unemployed groups and socially isolated groups.
- 5.7.3. The Town Centres theme supports social cohesion across the borough, with existing routes being prioritised and new venues being developed to encourage opportunities for social interaction between community members. Community safety could be compromised by the planned increase of night-time leisure and entertainment venues due to their potential to cause anti-social behaviour. This is particularly likely to impact young people who could be the main users of these venues. Mitigation measures are to be put in place via a management plan to avoid negative impacts of this on the surrounding community.
- 5.7.4. Access to services is highlighted by this theme, and the provision of community services is demonstrated to be the primary function of district centres and neighbourhood centres in the borough. Services are also being made more widely available to those workers in the night-time economy, who cannot access them during normal business hours, through the requirements for late-opening and 24-hour services.
- 5.7.5. Development in town centres are anticipated to have significant positive economic effects. The policies under this theme encourage and support existing and new business ventures in the borough, resulting in additional employment opportunities throughout. In particular, the planned increase of night-time leisure and entertainment venues in the borough will provide employment opportunities, as well as boost the local economy. The increase in employment opportunities as a result of this policy could have a positive impact on currently unemployed and low-income residents in the borough.

Town Centres Assessment

The assessment for Town Centre policies against each of the determinants of health has been set out below.

- 5.7.6. **Air Quality:** Policy TC2: Protecting the diversity, vitality, and viability of our town centres, seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
- 5.7.7. **Noise:** Numerous policies under this theme contribute positively to the noise environment throughout the borough. Policy TC2: Protecting the diversity, vitality and viability of our town centres, seeks to ensure that development proposals do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.
- 5.7.8. Food and drink venues under this policy will be required to demonstrate that the use of outdoor spaces will not have a significant impact on neighbourhood residential occupiers in terms of noise. Proposals for evening and nighttime leisure uses will also be expected to submit a management plan including methods to mitigate amenity impacts such as noise.
- 5.7.9. Improvements to the public realm through reductions in noise pollution can also positively contribute to the tranquillity of a setting, resulting in beneficial mental health impacts for all residents and workers.
- 5.7.10. **Housing and Homelessness:** The provision of short-stay accommodation under this theme will not compromise the supply of C3 self-contained homes and would not undermine the borough's ability to deliver against strategic housing targets. This will enable the continuation of affordable housing rollout, which will be beneficial for low-income groups who are the key recipients of such housing schemes and targets. Policy TC1 also promotes 'multi-purpose' town centres which include residential uses, which will support the provision of varied housing options available to local residents.
- 5.7.11. **Economy and employment:** Developments to town centres are anticipated to have positive economic effects. This theme's support of town centres directly continues the support of their role as key global employment centres. The protection and enhancement of existing employment spaces will positively contribute to the localised economies present in the borough.
- 5.7.12. Developments to town centres will encourage business investment in LBTH and improve the economy of the borough. Both larger businesses and independent, artisanal sector businesses will be encouraged to set up in developed, diverse town centres in LBTH. A diverse range of employment opportunities, including lower skilled work will be beneficial for those groups who are currently unemployed or those whose low skill and/or education levels, like young people (including care leavers), currently prohibit their entry into the borough's more predominant higher paid job markets. These employment opportunities may be high-quality, facilitating training for the low skilled to gain access to higher paid roles.

- 5.7.13. Additional town centre developments could contribute to the availability of additional employment opportunities within the borough, especially to otherwise marginalised groups. This theme can have a positive impact on those groups as a result of the nature of businesses in town centres, their physical proximity to residents, and the sense of community that they provide.
- 5.7.14. The improvement of town centres, and increase in employment opportunities could, potentially, have a positive impact on currently unemployed and low-income residents in the borough. Policy TC7: Evening and Night-time Economy specifically aims to boost the local economy by supporting food, drink and leisure uses in the evening and at night.
- 5.7.15. **Skills and education:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Skills and Education levels within LBTH, however, employment opportunities have the potential to boost skills and education through training, when provided by the employer.
- 5.7.16. **Social cohesion and community safety:** The diversification and investment in improving Town Centres in LBTH could improve social cohesion in the borough. Under this theme key pedestrian routes and street level activity will be prioritised in order to encourage opportunities for social interaction in the borough's town centres. The particular focus on food and drink provision in TC5 is especially significant for social cohesion as cafes and pubs provide ideal spaces for local residents, workers and students to meet and socialise. Enhancing these spaces will improve the levels of social cohesion possible in the borough.
- 5.7.17. There is potential for the increasing numbers of evening and night-time leisure and entertainment venues to give way to anti-social behaviour in the borough. Such instances would have negative impact on social cohesion and safety community wide. The policy aims to mitigate this through the adoption of a management plan. Gender inclusive safety (predominantly in night-time venues that involve the consumption of alcohol) is improved under this theme through the implementation of National Pubwatch and the 'Ask for Angela' scheme. Women and girls will benefit from this addition especially. Improved feelings of safety will enable women to engage more fully in social activities at night, alleviating feelings of stress and unease and promoting good mental health.
- 5.7.18. **Access to services:** Under this theme the network of centres across the borough is defined in relation to their function and how they serve the wider area. District centres and neighbourhood centre's primary role is the provision of community services to meet local needs. Easily accessible services are of a great beneficial impact to many social groups in the borough. In particular, health care services are of great importance to older people, new and expectant mothers, and those with disabilities.
- 5.7.19. Tower Hamlets has a high proportion of workers in the evening and night-time economy. As such, in order to better serve those who are unable to access services during normal business hours the policy encourages late-opening and 24-hour shops and services in the boroughs town centres. This will benefit those socially isolated groups who are limited in their ability to engage in daytime activities as a result of their employment situation.

- 5.7.20. **Physical activity:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Physical activity levels within LBTH due to the lack of inclusion of active travel measures, however, the physical proximity of town centre services to residents may encourage active travel to be favoured as a result of improved accessibility
- 5.7.21. **Green Infrastructure:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Green Infrastructure within LBTH due to the lack of policy relating to the inclusion of green infrastructure.
- 5.7.22. **Climate change resilience:** The policies outlined within the Town Centres theme are unlikely to directly impact upon Climate change resilience within LBTH due to the lack of policy relating to the mitigation of climate risk factors like flooding and overheating.

Table 5-6 – Town Centres Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
TC1	0	+/-	+	+	0	+/-	+	0	0	0	+ Younger people Low income groups and unemployed +/- Older people Socially excluded groups	Developments should seek to improve the public realm.
TC2	+	+	+	+	0	+	+	0	0	0	No specific groups have been identified.	No mitigation measures have been identified.
TC3	0	0	0	+	0	+	+	0	0	+	No specific groups have been identified.	Demand for retail is high in locations outside of Metropolitan, District and Neighbourhood Centres and is necessary to meet the immediate convenience needs of local people and/or support the function of designated employment locations.
TC4	0	0	0	+	0	+	0	0	0	0	+ Low-income groups and unemployed	No mitigation measures have been identified.
TC5	0	+	0	+	+	+	0	0	0	0	+ Low-income groups and unemployed Young people People with existing health conditions	It is recommended that waiting delivery drivers are prevented from acting as obstacles to users, including disabled users. If required this will be covered in a transport management plan.
TC6	0	0	0	+	0	0	+	0	0	0	+ Low-income groups and unemployed Young people	Developments should seek to improve the public realm. Hot food takeaway and gambling premises should continue to be placed away from areas where vulnerable groups such as children and low-income groups may frequent.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
TC7	0	-	0	+	+	0	+	0	0	0	+ Low-income groups and unemployed Young people Socially excluded or isolated groups - Children And young people Older people	The planning process and enforcement of conditions should consider sensitive receptors in the area on a case-by-case basis. Operation of the evening economy should be considered in tandem with safety measures to protect groups who could be more likely to be a victim of hate crimes. More emphasis should be placed on ensuring that nighttime uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQ+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.
TC8	0	0	+	+	0	0	0	0	0	0	No specific groups have been identified.	Ensure accessibility standards are adhered to in short-stay accommodation

5.8 Community Infrastructure

Assessment Summary

- 5.8.1. The assessment identified the following social groups that could be affected by Community Infrastructure policies:
- Infants and children;
 - Young people;
 - Older people;
 - People with long term health conditions;
 - People with disabilities; and
 - Socially excluded or isolated groups.
- 5.8.2. Community infrastructure policies aim to ensure the protection and enhancement of social and community facilities throughout the borough, including supporting new developments. These policies will have predominantly positive effects upon the community of LBTH. These policies are anticipated to benefit children and young people, older people, people with disabilities, people with long term health conditions, and socially excluded groups.
- 5.8.3. The provision of social infrastructure and facilities under the theme includes the provision of education facilities within the borough. This could potentially have positive effects for children and young people through increasing education levels and improving skills. Increasing levels of education among children in LBTH is likely to contribute to higher employability and an improved quality of life for children.
- 5.8.4. The improvement of social infrastructure such as parks and sports centres will also increase social cohesion and safety within the borough. This will benefit many social groups through providing areas for the community to interact. New community facilities should also enhance feelings of safety throughout the community.

Community Infrastructure Assessment

- 5.8.5. The assessment of the Community Infrastructure policies on each of the determinants of health have been detailed below.

Air Quality: Policy CI3: New and enhanced community facilities, seeks to ensure that development proposals for new community facilities take into consideration air quality levels as set out in the relevant guidance from the Department for Education and Sport England. The location of early education and childcare facilities in particular must meet the needs of young children and promote their development, doing this by being located away from areas of poor air quality. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents, especially infants and children in the borough.

Noise: Policy CI4: 'Development proposals demonstrate they have taken the necessary action to mitigate any issues that might arise from being in such proximity... (e.g. providing sufficient sound insulation) in line with the agent of change principle'. Compliance with

Policy CI4 should ensure that any potential adverse effects created by noise should be mitigated by specific measures (e.g. sounds insulation).

Housing and Homelessness: The policies outlined within this theme are unlikely to directly impact upon housing and homelessness within LBTH. By ensuring community facilities are located in accessible locations to housing, the quality of housing is indirectly improved through this theme.

Economy and employment: The improvement of social infrastructure establishments, such as health facilities, childcare facilities, and other services, are likely to provide additional high quality employment opportunities within LBTH. The provision of services related to childcare is particularly beneficial to women and caregivers as it may enable them to re/enter the employment market.

However, the ability for local residents to take up new employment opportunities will be dependent on the available skills in the resident population of LBTH. Where these skills are not available within current residents, roles may be filled with out of borough residents diluting the benefits to the local resident population.

Skills and education: The NLP will support the development of education facilities. This will ensure that children and young people in the borough have high quality facilities which enable them to attain good qualifications and educations. The policy includes a specific reference to the requirement for educational support needed for care leavers who may have experienced disruption to education in earlier years, and as such are especially in need of upskilling and educational opportunities.

Social cohesion and community safety: This theme has the potential to benefit social cohesion amongst the borough's population. The policies proposed within this theme include the preservation and enhancement of recreation facilities and other facilities used as social hubs. The development of such facilities may improve social cohesion and encourage those who are socially isolated to utilise facilities. Socialisation is a crucial aspect in improving the mental health and wellbeing of the population, especially those currently experiencing social isolation. New community facilities should also enhance feelings of safety through the use of passive surveillance.

Access to services: The policies proposed within this theme focus on improving and preserving access to services to all communities, which could assist in maintaining and improving the quality of life of a number of vulnerable groups, including the disabled, young people, old people, socially isolated, or those who have long term health conditions.

Policies under this theme support development proposals that maximise the opportunities for the provision of high-quality community facilities to serve a wide range of users. Services aim to be accessible to a wider community outside of core-hours to better meet the needs of different groups, delivering social value to the community. Additionally, the provision of multi-purpose and shared facilities such as sport and cultural facilities provide opportunities to integrate a range of community users and enhance social interactions.

Physical activity: Policy CI1: The council will expect development proposals to contribute to the capacity, quality, usability, inclusivity and accessibility of existing community facilities, particularly where development will increase demand. Community facilities include indoor sports and leisure facilities and have the potential to improve physical activity levels in the borough, leading to a potential reduction in incidents of obesity and the proportion of residents who are overweight. These positive effects could potentially impact across all demographic groups. Physical activity may be indirectly encouraged by the improved accessibility and safety of open spaces as brought about by the proposed policies.

Green Infrastructure: The policies outlined within the Community Infrastructure theme are unlikely to directly impact upon Green Infrastructure within LBTH due to the lack of policy relating to the inclusion of green infrastructure.

Climate change resilience: The policies outlined within the Community Infrastructure theme are unlikely to directly impact upon Climate change resilience within LBTH due to the lack of policy relating to the mitigation of climate risk factors like flooding and overheating.

Table 5-7 – Community Infrastructure Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
CL1	0	0	0	+	0	+	+	0	0	0	+ Children and young people Older people People with disabilities and mobility impairment People with existing health conditions Unemployed and low-income groups Socially excluded or isolated groups	The policy should ensure that improvements to existing community facilities are targeted so that all facilities meet the same standards of quality and service provision, ensuring all residents have access to facilities that meet their needs.
CL2	0	0	0	+	0	+	+	0	0	0	+ Children and young people Older people People with disabilities and mobility impairment People with existing health conditions Unemployed and low-income groups Socially excluded or isolated groups	No mitigation measures have been outlined for this policy. Mitigations are likely to be based on site specific information once development sites have come forward.
CL3	+	0	0	+	0	+	+	0	0	0	+ Children and young people Low income groups Socially excluded or isolated groups	New facilities should be located in accessible areas to local residents and working communities, contributing to positive effects on accessibility. All new community infrastructure developments will need to outline plans for the implementation of green infrastructure.
CL4	0	+	0	0	0	+	0	0	0	0	+ Younger people	No mitigation measures have been identified.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
											Older people	
CL5	0	0	0	0	0	0	0	0	0	0	No specific groups have been identified.	No mitigation measures have been identified.

5.9 Biodiversity and Open Space

Assessment Summary

- 5.9.1. The assessment identified the following social groups that could be affected by Biodiversity and Open Space policies:
- Children and young people;
 - Older people;
 - People with disabilities and mobility impairment; and
 - Socially isolated groups including new and expectant mothers.
- 5.9.2. Biodiversity and open space policies focus on enhancing open space throughout the borough in terms of quantity, quality, functionality and accessibility. These policies are anticipated to impacts on most health determinants, including positive effects for children and young people, older people, people with disabilities and mobility impairments, and socially isolated groups including new and expectant mothers.
- 5.9.3. The positive effects likely to result from these policies largely relate to the preservation and enhancement of the borough’s open spaces. Access to open spaces including parks as well as food growing spaces provides spaces for socially isolated groups like new and expectant mothers to meet and socialise.
- 5.9.4. Open spaces also provide ideal opportunities for recreation and leisure which will in turn promote physical activity and healthy lifestyles for the population. Physical activity in young children is particularly targeted through the improvement to play spaces throughout the borough.
- 5.9.5. Improved access to these spaces under this theme will enhance the benefit experienced through socialisation and physical activity opportunities.
- 5.9.6. Opportunities for education arise from the inclusion of the food growing policy, with young children particularly benefitting from this.
- 5.9.7. Climate change resilience is also considered under this theme, with urban greening positively contributing to the climate change resilience of the borough.

Biodiversity and Open Space Assessment

- 5.9.8. The assessment for Biodiversity and Open Space policies against each of the determinants of health have been outlined below.
- 5.9.9. **Air Quality:** Under this theme the air quality benefits of biodiversity are supported. Policy BO4: Biodiversity and access to nature, states that development proposals must enhance biodiversity and contribute to nature recovery within the borough. Urban greening and the provision of living building elements is considered especially beneficial in areas of sub-standard air quality throughout the borough. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents and workers in the borough.

- 5.9.10. **Noise:** There are unlikely to be any direct impacts upon noise as a result of the biodiversity and open space policies within LBTH.
- 5.9.11. **Housing and Homelessness:** There are unlikely to be direct impacts on housing due to biodiversity and open space policies within LBTH. Improved access to open space and food growing spaces for new housing development proposals may indirectly benefit the borough's housing stock. There are unlikely to be direct impacts on Homelessness due to the biodiversity and open space policies within LBTH.
- 5.9.12. **Economy and employment:** Well designed and accessible open spaces can offer valuable economic contributions to the borough. The safeguarding of water spaces throughout the borough under this theme enables the continuation of their positive contribution to the local economy. In relation to water, the Thames Vision set out by BO1: Green and blue infrastructure which promotes the management of the River Thames involves job creation associated with the river.
- 5.9.13. **Skills and education:** Policy BO7: Food growing, promotes opportunities for education via the provision of food growing spaces throughout the borough. Existing allotments will be protected under this policy and the provision of new food growing spaces maximised. There are unlikely to be direct impacts on Skills due to biodiversity and open space policies within LBTH.
- 5.9.14. **Social cohesion and community safety:** Preservation of existing open spaces including parks and the generation of new ones within the borough is likely to improve social cohesion by providing areas which foster opportunities for socialisation. This is most likely to benefit those who are socially isolated such as new and expectant mothers.
- 5.9.15. Policy BO7: Food growing is also likely to provide opportunities for social interactions across the borough. This will be especially beneficial for new and expectant mothers as they provide leisure and education for children, while being able to engage in social encounters themselves. Socially isolated groups are also likely to benefit from the social nature of gardening in communal spaces and on allotments.
- 5.9.16. The theme also involves improving access to such spaces, enabling even greater engagement and therefore beneficial impact from them.
- 5.9.17. Public realm enhancements under this theme include street crossing and other safety measures. Safety relating to water spaces is especially highlighted, including the provision of riparian lifesaving equipment such as grab chains and access ladders where necessary.
- 5.9.18. **Access to services:** Under this theme access to key services will be enhanced as part of a wider effort in public realm improvements associated with the Green Grid Strategy. Accessibility of the wider network by those with disability and mobility impairments is also considered.
- 5.9.19. **Physical activity:** All policies under this theme will positively contribute to the promotion of active and healthy lifestyles throughout the borough.

- 5.9.20. Preservation of existing open spaces including parks and the generation of new ones within the borough is likely to increase the number of people visiting open spaces and utilising these spaces for leisure and recreation. This is most likely to impact upon young people, adults, and older people who utilise these areas. This is also especially important to the Bangladeshi community, who currently are the most likely group in the borough to say that they do not have access to spaces with opportunities for play and recreation, the main reason being the lack of parks and green spaces in their local area²⁴.
- 5.9.21. Policy BO6: Play and recreation spaces recognises the importance of play spaces as key components in the physical activity levels and overall development of young children. The enhancement of recreational spaces for this purpose will aid in meeting the physical activity needs of the younger population in the borough.
- 5.9.22. **Green Infrastructure:** All policies under this theme positively contribute to the provision of green infrastructure. The theme primarily involves the maintenance and enhancement of green infrastructure provision throughout the borough. All existing open space will be protected, and in line with the Green Grid Strategy, will undergo quality, functionality and accessibility improvements. Opportunities to create new open space will also be maximised under this theme.
- 5.9.23. **Climate change resilience:** The NLP recognises that areas of biodiversity deficiency are particularly at risk of experiencing the Urban Heat Island effect. Urban greening as set out by this theme will positively contribute to climate change resilience throughout the borough.

Table 5-8 – Biodiversity and Open Space Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation	
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience			
BO1	+	+	0	+	0	+	+	+	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	No mitigation measures have been identified.
BO2	+	+	0	0	0	+	+	+	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	New parks and open spaces should be accessible to all members of the public. Design should especially consider the safety of women and young girls by including appropriate lighting, accessible pathways and access and egress points. Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility. Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.
BO3	0	0	0	0	0	+	0	0	+	+	+	No specific groups have been identified.	Public access should consider the needs of people with reduced mobility, and auxiliary aids and accessible signage should be used.
BO4	+	0	0	0	0	+	0	+	+	+	+	+ Children and young people Low-income groups People with existing health conditions Socially excluded or isolated groups	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
BO5	+	0	0	0	0	+	0	0	+	+	+ Low-income groups Socially excluded or isolated groups	Where practicable, sensory planting should be encouraged to aid the neurodiverse population in the borough.
BO6	0	0	0	0	0	+	0	+	+	+	+ Children and young people People with disabilities and mobility impairment Low-income groups	<p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p> <p>Accessible surfacing should be considered for mobility aid users and people with mobility restrictions.</p> <p>Opportunities for sensory stimulation should be maximised to ensure inclusive enjoyment of spaces.</p> <p>The policy might encourage business and facilities to open in play and recreational spaces as well as ensure active travel routes increase the busyness of parks. A busier, more vibrant environment will lessen the prevalence of idle parks that promote fear in women, especially mothers.</p>
BO7	+	0	0	0	+	+	+	+	+	+	+ Socially excluded or isolated groups Low-income groups	Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.

5.10 Movement and Connectivity

Assessment Summary

- 5.10.1. The assessment identified the following social groups that could be affected by Movement and Connectivity policies:
- Low-income groups; and
 - Socially isolated groups including new and expectant mothers.
- 5.10.2. The Movement and connectivity policies outline improvements to travel options throughout the borough, facilitating the increase of active and sustainable modes of travel. These policies are anticipated to impacts on most health determinants, including positive effects for low-income groups and socially isolated groups including new and expectant mothers in particular.
- 5.10.3. The theme is particularly supportive of improvements to settings for social cohesion throughout the borough. Healthy streets will foster vibrant and lively communities where different social groups can socialise and enjoy public space together. Safety is also highlighted within this theme, with requirements that new connectivity developments do not adversely impact the safety of the boroughs existing walking and cycling network.
- 5.10.4. The theme is widely beneficial to the physical activity levels of different social groups across the borough. Improvements to accessibility and connectivity of current pedestrian routes will encourage residents to engage with active transport, having beneficial impacts for the overall health and wellbeing of the population. The inclusion of town centres within the 15-minute neighbourhood principle may also improve physical activity rates.
- 5.10.5. While climate change resilience is not directly built into the policies proposed under this theme, the reduced reliance on private vehicles brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough.

Movement and Connectivity Assessment

- 5.10.6. The assessment for Movement and Connectivity policies against each of the determinants of health are outlined below.
- 5.10.7. **Air Quality:** Sustainable travel as proposed by this theme aims to tackle the significant issues with air quality associated with highway congestion and capacity constraints across public transport networks. Improved access to public and active transport across the borough with the aim to reduce reliance on private vehicles will help relieve congestion and improve air quality. Improvements to air quality will result in positive effects for the physical health and general wellbeing of the residents and workers in the borough.
- 5.10.8. **Noise:** In general, the encouragement of sustainable and active transport modes within these policies of are likely to reduce noise within LBTH. Specifically, road noise is likely to be reduced due to encouragement of a modal shift away from private car use.

- 5.10.9. Some developments supported by these policies could, if not well managed, increase noise pollution. However, Policy MC5: Sustainable delivery, servicing, and construction seeks to reduce the impact of delivery, servicing, and construction traffic on the environment and the health and well-being of residents, including in association with impacts of noise pollution. Housing and Homelessness: The policies outlined within the Movement and connectivity theme are unlikely to directly impact upon Housing and homelessness within LBTH.
- 5.10.10. **Economy and employment:** Policy MC5: Sustainable delivery, servicing, and construction seeks to support the deliveries and services that are essential to the economic growth of the borough.
- 5.10.11. **Skills and education:** The policies outlined within the Movement and connectivity theme are unlikely to directly impact upon Skills and education within LBTH.
- 5.10.12. **Social cohesion and community safety:** Numerous policies under this theme foster improved settings for social cohesion throughout the borough. In particular, the implementation of Healthy Streets supports many types of active travel, from commuting to work, to walking for pleasure, or cycling with children to school. Healthy streets will support vibrant and lively communities, where multiple social groups can come together to socialise and enjoy public spaces.
- 5.10.13. Additionally, the design and management of new connectivity development under this theme must ensure the development does not adversely impact the safety of the transport network throughout the borough. Development proposals that adversely impact the safety of the borough's walking and cycling network will not be supported. Improved settings for socialisation are particularly beneficial for socially isolated groups like new and expectant mothers.
- 5.10.14. Under policy MC5: Sustainable delivery, servicing, and construction, construction management plans and/or delivery and servicing plans are required to show how the Community Safety (CLOCS) standard has been incorporated.
- 5.10.15. **Access to services:** These policies are likely to improve overall connectivity within the borough, providing greater access to services and facilities.
- 5.10.16. The application of the Healthy Streets (Policy MC2: Active Travel and Healthy Streets) will help to simplify routes towards services for those who are elderly, disabled, or have sensory issues.
- 5.10.17. The improvement in public transport provision will improve access to other areas of the borough, as well as out of borough for those who routinely use public transport method.
- 5.10.18. This will most benefit young people, older people, those with disabilities, and socially isolated people, through allowing increased access to previously harder-to-access areas.
- 5.10.19. **Physical activity:** Healthy Streets, as proposed under this theme, supports many types of active travel; from commuting to work, to walking for pleasure, or cycling with children to school. This policy includes improvements to the accessibility and connectivity of

current pedestrian routes throughout the borough and into neighbouring boroughs. The support of such travel enables residents to engage in physical activity, having beneficial impacts for the overall health and wellbeing of the population.

- 5.10.20. Policies under this theme will work harmoniously with the borough's Transport Strategy to increase opportunities for active travel, with people becoming physically healthier. London has a 15-minute city concept, and the borough's location within inner London aims to align with this principle. Positive impacts will likely result from the encouragement of active travel such as walking or cycling to town centres due to their proximity to residential areas. The NLP will also provide delivery of high quality cycle provision and improved footways to support active travel.
- 5.10.21. In 2017/18, 33% of the poorest fifth of households in the UK did not have access to a car. On top of this, bus fares have increased by 47% since 2015. In accordance with this UK context for transport accessibility relating to finance, the 15-minute neighbourhood principle is beneficial for groups who struggle to afford public transportation costs such as low-income groups as it enables them to utilise active travel to get to work, generating significant cost savings.
- 5.10.22. **Green Infrastructure:** Policies under this theme commit to safeguard and contribute to maintaining and enhancing the borough's network of walking routes and cycleways, including the Thames Path and the Green Grid Network. The Green Grid Strategy works towards improving cross-borough connections, encouraging active travel and urban greening.
- 5.10.23. **Climate change resilience:** Reduced reliance on private vehicles as brought about by improvements to public transport and active travel options will likely contribute to reduced GHG emissions throughout the borough.

Table 5-9 – Movement and Connectivity Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
MC1	+	+	0	+	+	+	+	+	+	+	+ Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	<p>Cycle infrastructure should be designed in line with LTN 1/20 Cycle Infrastructure Design. This will ensure that Cycle tracks and footways are designed to be perceived as wholly separate facilities, ensuring the safety of both pedestrian and cyclist users.</p> <p>In order to successfully encourage the uptake of public transport, bus stops should ideally be located so that nobody in the neighbourhood is required to walk more than 400 metres from their home as per the governments Guide to Best Practice on Access to Pedestrian and Transport Infrastructure.</p>
MC2	+	+	0	0	0	+	+	+	+	+	+ Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	<p>Active travel infrastructure should be accessible and inclusive.</p> <p>Cycleways should provide enough space for adapted cycles such as tricycles, tandems and wheelchair cycles.</p> <p>Consideration should be made for removing other barriers towards active travel for disabled people, such as affordability. The council should work with charities and other representative groups to help lower the cost of adapted cycles.</p> <p>It is likely that other forms of sustainable travel will be prevalent in the future, such as electric scooters. Parking and facilities for these schemes should be accessible and not present physical barriers to users.</p>

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation	
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience			
MC3	+	+	0	0	0	+	+	0	0	0	+	Children and young people Older people People with disabilities and mobility impairment Socially excluded or isolated groups	No mitigation measures have been identified.
MC4	0	0	0	+	0	0	+/-	0	0	0	+/-	Older people People with disabilities and mobility impairment Low-income groups	It is recommended that the Purple Badge Scheme is implemented to ensure there will be no negative impacts on protected groups, such as disabled people. Management should protect priority bays to maintain accessibility for protected groups.
MC5	+	+	0	+	0	+	0	0	0	+		No specific groups have been identified.	No mitigation measures have been identified.

5.11 Reuse, Recycling and Waste

Assessment Summary

- 5.11.1. The assessment identified the following social groups that could be affected by Reuse, Recycling and Waste policies:
- All residents and workers
 - Older people
 - Children and young people.
- 5.11.2. Reuse, Recycling and Waste policies will have some positive effects on the health determinants identified across a selection of social groups within the borough.
- 5.11.3. Primarily, the improvement of air quality associated with this policy theme can have particularly beneficial effects for older people, infants, and those with long term health conditions.
- 5.11.4. New and improved waste storage facilities in new housing developments will improve the housing stock of the borough. Unfortunately, existing houses will not necessarily see improvements of the same nature under this policy, and so the distribution of beneficial effects is limited.
- 5.11.5. Climate change resilience is encouraged in the design of waste management facilities through the encouragement attachment to the district heating network and/or incorporation of opportunities for energy recovery and combined heat and power.

Reuse, Recycling and Waste Assessment

- 5.11.6. The assessment for Reuse, Recycling and Waste policies against each of the key determinants of health have been outlined below.
- 5.11.7. **Air Quality:** Policy RW2: New and enhanced waste facilities, seeks to ensure that development proposals to construct new waste facilities do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of air pollution.
- 5.11.8. Waste facilities should incorporate an air filtering system to reduce airborne particulate concentrations in and outside of the building, in line with Environment Agency advice. The policy also seeks to mitigate adverse air quality impacts associated with waste facilities. Improvements to air quality will be particularly beneficial for older people, infants, and those with long term health conditions.
- 5.11.9. Policies seek to locate waste facilities as far away as possible from sensitive receptors (such as residential uses, schools, nurseries, and health facilities), and seek to mitigate adverse air quality impacts associated with waste facilities. Policy RW2 also seeks to minimise amenity impacts on surrounding areas in terms of air quality and impacts on the transport network, according with Agent of Change principles.

- 5.11.1. **Noise:** Policy RW2: New and enhanced waste facilities, seeks to ensure that development proposals to construct new waste facilities do not have a negative impact on the amenity of neighbourhood residential dwelling, including as a result of noise pollution.
- 5.11.2. **Housing and Homelessness:** RW3 Waste storage facilities within new housing developments should be designed to avoid any adverse amenity impacts. Existing homes will not necessarily see improvements of the same nature under this policy, limiting the distribution of beneficial effects.
- 5.11.3. **Economy and employment:** Under this theme, development proposals to construct new waste facilities that demonstrate effective implementation of the waste hierarchy and its contribution to the circular economy will be supported. Waste-derived recycled materials are a key option for recovering value throughout the supply chain in relation to the circular economy.
- 5.11.4. **Skills and education:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Skills and education within LBTH.
- 5.11.5. **Social cohesion and community safety:** Development proposals that demonstrate accordance with Agent of Change principles to minimise amenity impacts on surrounding areas will be supported (RW2). Additionally, the locating of waste facilities away from residential areas will be beneficial to the health and safety of residents.
- 5.11.6. **Access to services:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Access to services within LBTH.
- 5.11.7. **Physical activity:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon Physical activity levels within LBTH.
- 5.11.8. **Green Infrastructure:** The policies outlined within the Reuse, recycling and waste theme are unlikely to directly impact upon green infrastructure within LBTH.
- 5.11.9. **Climate change resilience:** To minimise the impact on climate change, waste management facilities under this theme are encouraged to incorporate opportunities to be attached to the district heating network and/or incorporate opportunities for energy recovery and combined heat and power.

Table 5-10 – Reuse, Recycling and Waste Summary

Policy	Determinant of health										Affected Vulnerable Groups	Recommendations/ Mitigation
	Air	Noise	Housing and homelessness	Economy and Employment	Skills and education	Social cohesion and community safety	Access to services	Physical activity	Green Infrastructure	Climate change resilience		
<i>Reuse, recycling and waste</i>												
RW1	0	0	0	+	0	+	0	0	0	+	No specific groups have been identified.	No mitigation measures have been identified.
RW2	+	+	0	+	0	+	0	0	0	+	No specific groups have been identified.	No mitigation measures have been identified.
RW3	0	0	+	+	0	0	0	0	0	+	No specific groups have been identified.	Internal waste management spaces will further improve the streetscape around flats and higher density residential areas. Bringing waste facilities inside is also beneficial to disabled groups who suffer as a consequence of footpath obstruction resulting from outdoor waste management.

6 Conclusion

6.1 Summary

- 6.1.1. On the whole the NLP is likely to result in a number of positive effects across the determinants of health and vulnerable groups, however there is potential for some policies to have adverse effects. A summary of the key effects has been detailed below:
- **Air Quality:** Positive effects associated with Clean Green Future policies as air quality improvements will help to minimise the negative effects upon those in the most vulnerable social groups. Conversely, urban intensification through the Homes for the Future policies drive for additional housing in LBTH could result in a higher number of cars on the city's roads, which could contribute to a worsening of air quality. However, all construction sites in the borough will be expected to meet or exceed the good practice set out in the Tower Hamlets Code of Construction Practice in relation to dust and air quality.
 - **Noise:** Mixed effects have been identified. The increase in housing in LBTH could result in higher numbers of cars, contributing to increased road traffic noise in the area. Improvements to entertainment venues and the night-time economy will also negatively contribute to increased noise levels throughout the borough. Additionally, construction related noise from developments may negatively impact upon the tranquillity. However, the NLP sets out to reduce noise and vibration as a result of construction and developments throughout the Borough, reducing the levels of nuisance felt to those living in close proximity to developments.
 - **Housing and Homelessness:** Positive effects have been identified as policies under the Homes for the Future theme will aid in meeting the growing demand for housing through new provision. Housing will be suitable for varying residential needs throughout the borough, including the provision of affordable housing, specialist and supported housing and purpose-built student accommodation. This could have positive effects for many vulnerable groups, predominantly working aged adults (18-74) and those who are homeless.
 - **Economy and employment:** Positive effects have been identified. Policies will encourage business investment in LBTH and improve the economy of the Borough. In particular, the provision and protection of affordable workspaces will aid in supporting new and emerging economic sectors in the borough. Additional town centre developments and an increase in shops, entertainment venues and food and drink facilities under the NLP is also likely to reduce unemployment in the Borough, having positive effects for the unemployed and low-income residents in the Borough.
 - **Skills and education:** Positive effects have been identified. The development of education facilities under this sector will ensure young people in the borough continue to attain good qualifications. Additionally, Inclusive Economy and Good Growth policies intend to close the skills gap amongst the working population through improving access

to education and training. Upskilling opportunities will be particularly beneficial to the health of young people throughout the borough.

- **Social cohesion and community safety:** Positive health effects have been identified. The provision and improvement of community facilities such as community hubs will facilitate socialisation and cross-cultural engagement throughout the borough community. The development of open space and recreational facilities including parks and play spaces may also improve social cohesion and encourage those who are socially isolated to utilise facilities. Additionally, improvements to the public realm under the People, Places and Spaces theme include safety measurements such as appropriate signage of public areas, good lighting and surveillance. The promotion of a safe living environment will contribute positively to the physical and mental wellbeing of all residents.
- **Access to services:** Positive health effects have been identified. It is assumed that new community housing developments within the Borough will have suitable access to community facilities and shops. Additionally, policies under the Community Infrastructure theme support development proposals to maximise opportunities for the provision of high-quality community facilities. Access to services will improve the health of elderly residents, improving health and reducing loneliness.
- **Physical activity:** Positive health effects have been identified. The Movement and Connectivity theme policies propose many types of active travel, from commuting to work to walking for pleasure. Improved accessibility and connectivity of current pedestrian routes throughout the borough will encourage the uptake of active travel, bring positive effects to the overall health of the population. Further, the inclusion of town centres within the 15-minute neighbourhood principle may improve physical activity rates.
- **Green Infrastructure:** Positive health effects have been identified. Improvements to green infrastructure are supported through the Biodiversity and Open Space policies. This includes the protection and enhancement of existing biodiversity throughout the borough as well as new provisions to contribute a 30% Biodiversity Net Gain (BGN). The maintenance of green infrastructure and accessible open spaces contributes to improving mental wellbeing by providing spaces for physical activity and social interaction. Green infrastructure could be further promoted through additional requirements under the Homes for the Community theme.
- **Climate change resilience:** Mixed effects have been identified. The policies proposed within Clean Green Futures will attempt to limit the excessive heat generation and overheating potential of developments, therefore improving the resilience of all new buildings within the Borough. However, this only accounts for new developments, leaving those in existing areas vulnerable to climate change events.

6.2 Recommendations

6.2.1. A number of recommendations have been identified which have been outlined in Table 6-1 below. These changes will be considered by LBTH during the preparation of the preferred plan for Regulation 19 consultation.

Table 6-1 – HIA Recommendations

Policy/ Theme	Recommendation
Policy DV6	Social value contributions would be enhanced through specific implementation of plans to encourage communities meaningful engagement in local and regional decision-making.
Policy HF1	Tenants should be limited to one private vehicle per household. Housing needs should be considered to include Electric Vehicle Charging Facilities. This way, residents are encouraged and supported to switch to electric vehicles for private usage and the potential adverse air quality impacts of new housing and associated increases in vehicle emissions will be lessened.
Policy HF1	Increased demand on services throughout the borough as a result of the growing population will require the strengthening of services. This should take the form of provision of new facilities as well as the employment of additional staff.
Policy HF6	All purpose-built student accommodation should have a noise nuisance curfew in place between 11pm and 7am. This should be communicated to all new residents upon the start of their tenure as well as potential penalties they could face in instances of breaking the curfew.
Policy CG4	Appropriate subsidies should be considered to ensure low-income groups can access sustainable retrofitting with no additional financial barriers. Retrofitting should not increase property prices in order that first time buyers remain able to buy into the property market and not be priced out.
Policy PS1	In instances where tall buildings are required to meet high density requirements of this policy, potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
Policy PS2	Accessibility must be considered at all stages of tall building design, construction and operation so as to not exclude groups such as wheelchair users.

Policy/ Theme	Recommendation
	Potential for social isolation must be addressed through the provision of high quality private communal open space as well as shared ground floor facilities occupants of the building can use.
Policy PS10	Advertisement content including hot food takeaway and betting should consider placement away from areas where vulnerable groups such as children and low-income groups may frequent.
Policy TC7	More emphasis should be placed on ensuring that nighttime uses are safe for all, not just women and girls but also minority ethnic groups and members of the LGBTIQA+ community. An additional point could therefore be added to Policy TC7 which outlines more specific safety measures such as additional policing or citizen type patrols, CCTV and lighting.
Policy CI1	The policy should ensure that improvements to existing community facilities are targeted so that all facilities meet the same standards of quality and service provision, ensuring all residents have access to facilities that meet their needs.
Policy CI3	All new community infrastructure developments will need to outline plans for the implementation of green infrastructure.
Policy BO2	<p>New parks and open spaces should be accessible to all members of the public. Design should consider safety by including appropriate lighting, accessible pathways and access and egress points.</p> <p>Accessibility and safety could be improved in existing spaces by providing lighting, accessible signage, and auxiliary aids to people with reduced mobility.</p>
Policy BO6	<p>Part 2 (b) could include mention of suggested measures to tackle barriers to inclusion and equality.</p> <p>Recreational spaces should be accessible by pushchair so parents with younger children are still able to access facilities.</p>
Policy BO7	Food growing sites should be located in areas of best air quality in order that food grown is of a high standard and achieves good dietary nutrition and health.



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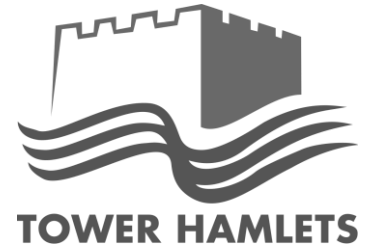
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London Borough of Tower Hamlets

New Local Plan (Regulation 19)

Habitats Regulations Assessment



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New Local Plan (Regulation 19)

Habitats Regulations Assessment

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Appendix A

CJEU Rulings

Appendix B

Habitats Sites Details, Including Qualifying Features and Conservation Objectives

Appendix C

APIS Information for SPA and SAC Sites within 7.2km of the Allocated Sites (2023 data)

Appendix D

Annual Mean NOX Concentrations

1 Introduction

- 1.1.1 The London Borough of Tower Hamlets (hereafter referred to as LBTH) is in the process of preparing a new Local Plan for the Borough.
- 1.1.2 The current Local Plan was adopted in January 2020 and covers the period up to 2031¹. Under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), Councils are required to regularly review and update their Local Plans to ensure that they are fit for purpose. Therefore, the LBTH is currently preparing a new Local Plan to guide development within the borough up to 2038. The Local Plan will identify the location, scale and uses of development that will come forward within the borough and demonstrate how the needs of Tower Hamlet's current and future population will be met. This includes a target to secure delivery of at least 52,095 new homes across the borough between 2023 and 2038, which includes a proportion (34,730 homes) set by the London Plan (2021)² as part of a ten-year housing target (for the period 2019/20 to 2028/29).
- 1.1.3 Prior to adoption, the new Local Plan must go through several stages of review, consultation and engagement. This includes: initial preparation and consultation on what the Local Plan should contain (Regulation 18), production of a Publication Draft Local Plan (Regulation 19), submission of the Local Plan to the Secretary of State for Housing, Communities and Local Government (Regulation 22), and finally public examination (Regulation 24). Consultation on the Regulation 18 version on the Local Plan took place between 6th November and 18th December 2023 and the Council are currently preparing the Regulation 19 Consultation Draft.
- 1.1.4 The Local Plan is a statutory document³ that forms part of the Council's strategy to deliver sustainable development, tackle climate change and deliver new homes, jobs and infrastructure for current and future LBTH residents. Local Plans must be positively prepared, justified, effective and consistent with national policy, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF)⁴.

¹ London Borough of Tower Hamlets (2020) Tower Hamlets Local Plan 2031. Managing growth and sharing the benefits. Available at: [Local plan \(towerhamlets.gov.uk\)](https://www.towerhamlets.gov.uk/local-plan)

² Mayor of London (2021) The London Plan. Available at [the london plan 2021.pdf](https://www.london.gov.uk/plan-and-strategy/london-plan)

³ Section 19 of the Planning and Compulsory Purchase Act 2004 sets out specific matters to which the local planning authority must have regard when preparing a local plan. Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the general form and content of local plans and adopted policies maps, while [regulation 10](#) states what additional matters local planning authorities must have regard to when drafting their local plans.

⁴ The National Planning Policy Framework 2023. Available online: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 1.1.5 The Local Plan sits within a wider framework of planning documents, including national guidance set out by the government in the NPPF (as referenced above), regional and city planning policies and guidance, strategic plans, supporting strategies and background studies. The Local Plan will form the basis on which planning applications will be determined within LBTH’s administrative area.
- 1.1.6 WSP has been appointed by LBTH to undertake the Habitats Regulations Assessment (HRA) for the Local Plan, which has progressed to the Regulation 19 stage. The focus of the HRA process is on identifying the potential for adverse effects as a result of the Local Plan policies on the integrity of European nature conservation sites and other designations addressed through HRA as a matter of policy (hereafter referred to as “Habitats sites”).
- 1.1.7 Under The Conservation of Habitats and Species Regulations 2017⁵ (as amended) (the ‘Habitats Regulations’) ‘Competent Authorities’ must assess plans and projects for their potential to cause Likely Significant Effects (LSE) on Habitats sites. Where the plan or project may lead to LSE it must be subject to an Appropriate Assessment to determine whether there will be adverse effects to any Habitats sites.
- 1.1.8 This exercise identifies all relevant Habitats sites where LSE could occur and the information captured here will form the evidence base for this Stage 1 HRA (Screening). Further consideration of LSE is then provided within the Stage 2 Appropriate Assessment (see Methodology Section 2).

1.2 Report Framework

- 1.2.1 This HRA screening report has been produced as a part of the Integrated Impact Assessment (IIA) that incorporates the requirement of a Strategic Environmental Assessment (SEA) for the Local Plan and associated plans.
- 1.2.2 At a screening level, this report will ensure that all HRA-related considerations are fully integrated into the Local Plan documents as they develop.
- 1.2.3 This report details:
 - the HRA process and methodology for assessment;
 - the relevant Habitats sites within the Zone of Influence (Zol) for the Local Plan policies;
 - the challenges of the Local Plan policies and how these may impact upon relevant Habitats sites;

⁵ The Conservation of Habitats and Species Regulations 2017. Available at: [The Conservation of Habitats and Species Regulations 2017 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

- the screening of LSE (Stage 1) of the Local Plan policies (including reference to the supporting report *Air Quality Information Report to Support Habitats Regulations Assessment*⁶), and;
- The consideration of potential adverse effects on site integrity within Stage 2 Appropriate Assessment (including reference to the supporting report *Air Quality Information Report to Support Habitats Regulations Assessment*, (WSP 2024).

1.2.4 It should be noted that this HRA has been based solely upon the LBTH New Local Plan policies and does not replace a detailed analysis of any projects that may be brought forwards subsequent to the New Local Plan where additional LSE may arise.

1.3 The LBTH Local Plan

1.3.1 The New Local Plan sets out a vision for the future of the Borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of our environment, green spaces and cultural and historic assets.

1.3.2 Once adopted, the Local Plan together with adopted Neighbourhood Plans (made by qualifying bodies) and the London Plan will form the Tower Hamlets Development Plan and be the basis for determining planning applications, shaping how the Borough will develop through to 2040. Further details relating to the Local Plan, including the Local Plan vision and objectives are set out within the Interim Integrated impact Assessment Report (WSP, 2023).

1.3.3 The Local Plan policies which are the focus of this screening exercise are listed in Table 1-1, provided by LBTH. A brief summary of each policy is also given in the screening Table 7-3 Section 7.

Table 1-1 – Proposed LBTH Local Plan policies screened in the HRA

Policy number	Title
Delivering on the Local Plan	
DV1	Areas of growth and opportunity within Tower Hamlets
DV2	Delivering sustainable growth in Tower Hamlets

⁶ *Air Quality Information Report to Support Habitats Regulations Assessment – London Borough of Tower Hamlets New Local Plan (Regulation 19)*, WSP, June 2024

Policy number	Title
DV3	Healthy communities
DV4	Planning and construction of new development
DV5	Developer contributions
DV6	Social value
DV7	Utilities and digital connectivity
DV8	Site Allocations
Homes for the Community	
HF1	Meeting housing needs
HF2	Affordable housing and housing mix
HF3	Protection of existing housing
HF4	Supported and specialist housing
HF5	Gypsy and traveller accommodation
HF6	Purpose-built student accommodation
HF7	Large-scale purpose-built shared living
HF8	Housing with shared facilities (houses in multiple occupation)
HF9	Housing Standards and Quality
Clean and Green Future	
CG1	Mitigating and adapting to a changing climate
CG2	Low energy buildings
CG3	Low carbon energy and heating
CG4	Embodied carbon, retrofit and the circular economy
CG5	Overheating
CG6	Managing flood risk
CG7	Sustainable drainage

Policy number	Title
CG8	Water efficient design
CG9	Air quality
CG10	Noise and vibration
CG11	Contaminated land
People Places and Spaces	
PS1	Design and infrastructure-led approach to development
PS2	Tall Buildings
PS3	Securing design quality
PS4	Attractive streets, spaces and public realm
PS5	Creating inclusive places
PS6	Heritage and the historic environment
PS7	World heritage sites
PS8	Shaping and managing views
PS9	Shopfronts
PS10	Advertisements, hoardings and signage
PS11	Siting and design of telecommunications infrastructure
Employment and economic growth	
EG1	Creating investment and jobs
EG2	New employment space
EG3	Affordable workspace
EG4	Loss and redevelopment of employment space
EG5	Railway Arches
EG6	Data Centres
Town Centres	

Policy number	Title
TC1	Supporting the network and hierarchy of centres
TC2	Protecting the diversity, vitality and viability of town centres
TC3	Town centre uses outside our town centres
TC4	Markets
TC5	Food and drink
TC6	Entertainment uses
TC7	Evening and night-time activities
TC8	Short-stay accommodation
Community Infrastructure	
CI1	Supporting community facilities
CI2	Existing community facilities
CI3	New and enhanced community facilities
CI4	Public houses
CI5	Arts and Culture facilities
Biodiversity and open space	
BO1	Green and blue infrastructure
BO2	Open spaces and the Green Grid network
BO3	Water spaces
BO4	Biodiversity and access to nature
BO5	Urban greening
BO6	Play and recreation spaces
BO7	Food growing
Movement and Connectivity	
MC1	Sustainable travel

Policy number	Title
MC2	Active travel and healthy streets
MC3	Impacts on the transport network
MC4	Parking and permit-free
MC5	Sustainable delivery, servicing and construction
Reuse, Recycling and Waste	
RW1	Managing our waste
RW2	New and enhanced waste facilities
RW3	Waste collection facilities in new development

2 Relevant policy, legislation, case law and guidance

2.1 Legislative Background

- 2.1.1 Under The Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations') 'Competent Authorities' must assess Plans and projects for their potential to cause LSE on Habitats sites. Where the plan or project may lead to LSE it must be subject to an Appropriate Assessment to determine whether there will be adverse effects to any Habitats sites. Any plan or project that would lead to adverse effects on the integrity of Habitats site(s) cannot be permitted without meeting strict additional tests.
- 2.1.2 Defra guidance⁷ states that Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a National Site Network (NSN) on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:
- existing SACs and SPAs; and
 - new SACs and SPAs designated under these Regulations.
- 2.1.3 Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new NSN.
- 2.1.4 It is a matter of Government policy (NPPF paragraph 118) that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (commonly known as Ramsar sites) are also considered in the same way as Habitats sites. Together, these sites are referred to as 'Habitats sites' in the NPPF and in this report.
- 2.1.5 Other site designations of national or local importance are not assessed by the HRA process, but with respect to Sites of Special Scientific Interest (SSSI) these designations largely overlap with European or Ramsar sites.
- 2.1.6 Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:
- fulfil the commitment made by government to maintain environmental protections; and
 - continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

⁷ Defra Policy Paper Changes to the Habitats Regulations 2017 (Published 1 January 2021). Available online: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

2.1.7 This report presents information to enable the screening assessment required as part of Stage 1 of the HRA process, to establish whether or not the LBTH Local Plan will have a LSE upon the NSN and Habitats sites.

2.1.8 The principle of Favourable Conservation Status (FCS) of features within Habitats sites as set out in the original Habitats Directive⁸ is central to this assessment. The use of the term FCS is not amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the term still has the meaning given by Article 1 of the Habitats Directive. Defra guidance⁹ does however note that:

“an appropriate authority is only responsible for managing and adapting the national site network to secure FCS of a feature proportionately to the importance of the UK within the feature’s natural range”.

2.1.9 The Habitats Directive provides further interpretation of the meaning of ‘favourable conservation status’ within Article 1 parts a, e and i as below.

‘(a) conservation means a series of measures required to maintain or restore the natural habitats and the populations of species of wild fauna and flora at a favourable status as defined in (e) and (i);.....

(e) conservation status of a natural habitat means the sum of the influences acting on a natural habitat and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species within the territory referred to in Article 2. The conservative status of a natural habitat will be taken as "favourable" when:

- *its natural range and areas it covers within that range are stable or increasing, and*
- *the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and*
- *the conservation status of its typical species is favourable as defined in (i);*

(i) conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within the territory referred to in Article 2; The conservation status will be taken as "favourable" when:

⁸ The Habitats Directive, European Commission. Available online: https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

⁹ Defra Policy Paper Changes to the Habitats Regulations 2017 (Published 1 January 2021). Available online: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

- *population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and*
- *the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and*
- *there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis’.*

2.2 Stages of Habitats Regulations Assessment

2.2.1 Guidance on managing Natura 2000 sites and the provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC¹⁰ (2018) sets out the step-wise approach which should be followed to enable Competent Authorities to discharge their duties under the Habitats Directive and provides further clarity on the interpretation of Articles 6 (3) and 6 (4), as presented below (with additional interpretation in brackets).

Article 6(3) defines a step-wise procedure for considering plans and projects.

a) The first part of this procedure consists of a pre-assessment stage (‘screening’) to determine whether, firstly, the plan or project is directly connected with or necessary to the management of the site, and secondly, whether it is likely to have a significant effect on the site; it is governed by Article 6(3), first sentence. *(Often commonly referred to in practice as HRA Stage 1 – Screening)*

*b) The second part of the procedure, governed by Article 6(3), second sentence, relates to the Appropriate Assessment** and the decision of the competent national authorities. (A simplified flow chart of this procedure is presented in Annex II at the end of the guidance document). **(Often commonly referred to in practice as HRA Stage 2 – Appropriate Assessment)*

A third part of the procedure (governed by Article 6(4)) comes into play if, despite a negative assessment, it is proposed not to reject a plan or project but to give it further consideration. In this case Article 6(4) allows for derogations from Article 6(3) under certain conditions.

The applicability of the procedure, and the extent to which it applies, depend on several factors, and in the sequence of steps, each step is influenced by the previous step. The order in which the steps are followed is therefore essential for the correct application of Article 6(3).

2.2.2 As set out in Regulation 3 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 where Natura 2000 sites are referenced in previously issued

¹⁰ Commission Notice C(2018) 7621 final, Brussels, 21.11.2018 *Managing Natura 2000 sites - The provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC* Available in all EU languages from: http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm

guidance, this should be interpreted as relating to the national site network but does not otherwise affect guidance as it applied, before EU exit day.

- 2.2.3 Under the Habitats Regulations in England and Wales the approach taken to the stage referred to as ‘derogation’ follows the same fundamental steps as established above in EC Guidance, comprising consideration of alternative solutions, IROPI, and compensatory measures.

2.3 Relevant Case Law

- 2.3.1 There are a number of recent Court of Justice of the European Union (CJEU) rulings which are relevant to this assessment and these are given below for information. As the general provisions for the protection of Habitats sites and the procedural requirements to undertake HRA to assess the implications of Plans or Projects for Habitats sites remain, this previous case law established prior to the UK's exit from the EU is considered to apply unless superseded by the judgement of an appropriate UK court.

The Wealden Judgement

- 2.3.2 The Wealden Judgement¹¹, handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.
- 2.3.3 Prior to this Judgement, it was deemed that air quality impacts on Habitats sites need only be considered alongside roads where the traffic growth associated with the individual Plan or project being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07¹²) which has been subsequently withdrawn, namely:
- Increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).
- 2.3.4 The Wealden Judgement found that the application of the criteria to the traffic growth associated with a single Local Plan was unsound on the basis that two Local Plans collectively contributing more than 1000 AADT could lead to a potentially significant effect. The Judge determined that further assessment of air quality impacts on Habitats sites should have been carried out and quashed part of the Local Plan that would have led to an

¹¹ Judgment in *Wealden District Council v. Secretary of State for Communities and Local Government*, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.

¹² *Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)*. Withdrawn, but available at: <https://standardsforhighways.co.uk/dmr/archive/search/df0c77ed-887b-4c84-be0e-000fe18545ae>

in-combination exceedance of 1,000 AADT.

The People over Wind Case

- 2.3.5 The Court of Justice of the European Union’s (CJEU’s) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17)¹³ (hereafter referred to as the ‘Sweetman Case’), states that: ‘Article 6(3) must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.’
- 2.3.6 In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.
- 2.3.7 This is an emerging issue for local authorities and means that, alongside the Wealden judgement and the potential for ‘in-combination’ effects, the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats sites, full Appropriate Assessment is more frequently required.

Cjeu Ruling in The Netherlands Nitrogen and Agriculture Cases C-293/17 And C-294/17

- 2.3.8 The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality. Notably, the Court of Justice of the European Union ruled that:
- An ‘Appropriate Assessment’ may only take into account the existence of Article 6(1) ‘conservation measures’, or Article 6(2) ‘preventive measures’, or specific measures adopted for a conservation programme, or ‘autonomous’ measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.

¹³ Judgement of the Court 12 April 2018, People Over Wind, Peter Sweetman, Coillte Teoranta <https://curia.europa.eu/juris/document/document.jsf?jsessionid=B02FE6F4F1C61308615DBBDF079EE5F4?text=&docid=200970&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=11190634>

- National measures such as procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying with Article 6(2).

2.4 National Planning Policy

2.4.1 National Planning Policy Framework

2.4.2 In relation to biodiversity and the Draft LTP, the following paragraphs in the document are relevant:

- Paragraph 180, which states ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - (c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’

- Paragraph 181 which states ‘Plans should:

distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.’

2.5 Relevant Guidance (Primary Resources)

2.5.1 Natural England's Internal Guidance

2.5.2 In June 2018, Natural England published guidance¹⁴ on their approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. The document draws upon Annex F of the DMRB (now withdrawn) but takes into account the Wealden Judgement and need to assess 'in-combination' effects on Habitats sites as a result of air pollution.

2.5.3 The guidance provides a framework around the assessment of road traffic emissions and subsequent effects on Habitats sites. Notably:

- Step 1 – Does the proposal give rise to emissions which are likely to reach a Habitats Site;
- Step 2 – Are there qualifying features within 200m of a road sensitive to air pollution;
- Step 3 – Could the sensitive qualifying features of the site be exposed to emissions; and
- Step 4 – Application of the Screening Thresholds.
 - Step 4a: apply the threshold alone;
 - Step 4b: apply the threshold in-combination with emissions from other road traffic plans and projects; and
 - Step 4c: apply the threshold in-combination with emissions from other non-road plans and projects.
- Step 5: Advise on the need for Appropriate Assessment where thresholds are exceeded, either alone or in-combination.

2.5.4 The relevant thresholds in relation to Step 4 are as follows:

- Changes in AADT of 1000 vehicles a day (or more); and/or
- Changes of 1% of the relevant Critical Load and/or Level as a result of the Plan/Project.

2.5.5 IAQM's GUIDE To the Assessment of Air Quality Impacts on Designated Nature Conservation Sites

2.5.6 The Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites (IAQM, May 2020)¹⁵ provides advice for ecologists relating to air quality assessments (AQAs), to evaluate the effects of air pollution on habitats and species, by increasing their

¹⁴ Natural England (June 2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations at:
<http://publications.naturalengland.org.uk/publication/4720542048845824>

¹⁵ Holman et al (2020). *A guide to the assessment of air quality impacts on designated nature conservation sites – v1.1*
Available at: <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf>

understanding of the information provided by air quality specialists. The Guide focusses on the AQA process and no specific detail on the subsequent stage of the overall process, i.e. the assessment of the effects that air quality impacts may have on habitats and species, is provided in this guidance.

2.5.7 Updated DMRB (LA 115 – Habitats Regulations Assessment)

2.5.8 DMRB document LA 115 - Habitats Regulations Assessment¹⁶ states that HRA shall include systematic collection, assessment, and reporting of the implications of highways projects on Habitats sites and shall be implemented forthwith on all projects involving HRA on the motorway and all-purpose trunk roads. In addition to identifying the habitats site designations to be considered within HRA and the format of reporting, the document sets out (principles and purpose) that:

- The precautionary principle shall be applied in reporting through all HRA stages.
- Recourse to the precautionary principle may be relevant when there:
 1. are "potentially negative effects"; or
 2. is "insufficiency of the data, which makes it impossible to determine with sufficient certainty the risk in question".
- Site conservation objectives should prevail where there is uncertainty.
- Adverse effects should be reported in the HRA in the absence of evidence to the contrary.

2.5.9 CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

2.5.10 This guidance¹⁷ from the Chartered Institute of Ecology and Environmental Management is intended to take ecologists (and air quality specialists) through the issues that they should consider in order to make an informed judgement as to the ecological effects of changes in pollution concentrations and deposition rates. The approaches set out build on the advice and guidance from Natural England and IAQM, but focus on the ecologist role to interpret the numerical output of air quality assessments to reach evidence-based conclusions on ecological significance.

¹⁶ Highways England (November 2019) Design Manual for Roads and Bridges, LA115 – Habitats Regulations Assessment. Available at: <https://standardsforhighways.co.uk/dmrB/search/e2fdab58-d293-4af7-b737-b55e08e045ae> .

¹⁷ CIEEM (January 2021) *Advisory Note: Ecological Assessment of Air Quality Impacts*. Available at: <https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/#:~:text=Advisory%20Note%3A%20Ecological%20Assessment%20of%20Air%20Quality%20Impacts..of%20changes%20in%20pollution%20concentrations%20and%20deposition%20rates> .

2.5.11 Additional guidance

2.5.12 Multiple sources of guidance are available to HRA practitioners which are specific to interpretation of assessment processes or technical areas of assessment. Where relevant, these are cited within this report.

3 Methodology

- 3.1.1 This report presents the findings of the Screening undertaken as part of Stage 1 of the HRA process to establish whether or not the likely impacts of the LBTH Local Plan could have LSE on Habitats sites.
- 3.1.2 This document provides this information by undertaking the following steps:
- determining whether the Plan is directly connected with or necessary for the management of applicable Habitats sites;
 - describing the Plan impacts that may have the potential for significant effects upon applicable Habitats sites; and
 - describing the potential pathways of impacts, both alone and in-combination with other plans and projects.
- 3.1.3 The precautionary principle is applied at all stages of the HRA process. In relation to screening this means that plans and projects where effects are considered likely and those where uncertainty exists as to whether effects are likely to be significant must be subject to the second stage of the HRA process, Appropriate Assessment.
- 3.1.4 The first step of the review is to establish whether the LBTH Local Plan should be subject to HRA.
- 3.1.5 Depending on the conclusion of this step, the assessment progresses to information gathering; in particular the identification of Habitats sites which will likely require consideration and on which background information is collated. This information includes the qualifying features of these sites, the conservation objectives and the sensitivities of those sites.
- 3.1.6 As part of the information gathering stage, in the assessment of Local Plans consideration is generally given to the air quality sensitivities of these Habitats sites, specifically their qualifying features, to changes in both nitrogen oxide (NO_x) and ammonia (NH₃) concentrations and nitrogen (N) deposition and then consideration of these changes in relation to the Critical Level and relevant Critical Loads¹⁸.
- 3.1.7 For those Habitats sites with identified pressures or threats associated with air quality, further detailed assessment is provided within the supporting *Air Quality Information Report to Support Habitats Regulations Assessment* (WSP, 2024) and summarised here.
-

¹⁸ Critical Loads and Levels are metrics used for assessing the risk of air pollution impacts to sensitive vegetation and ecosystems.

3.1.8 The final element of the information gathering stage is to review the availability of relevant data sets and sources which will form the evidence base of the assessment of the Local Plan policies alone and in-combination with other relevant plans and projects. Information on sources of HRA guidance are given below and the legislative and policy background including the relevant CJEU rulings, are given in Appendix A.

4 Review Results

4.1 Is HRA required?

4.1.1 The review looked to specifically answer each of the questions set out in the HRA review methodology. It should be noted that the level of detail of the Local Plan only allows for an anticipated assessment of the need for HRA based on experience of similar plans and projects (see Table 4-1 below).

Table 4-1 – Is HRA required?

	Question	Response
1	Is the whole of the plan directly connected with or necessary to the management of a Habitats site for nature conservation purposes?	No
2	Is the plan a ‘strategic development plan’ or ‘local development plan’ or ‘supplementary guidance’ or a core path plan or a revision thereof?	Yes
3	Does the plan provide a framework for deciding applications for project consents and / or does it influence decision makers on the outcome of applications for project consents?	Yes
4	Does the plan contain a programme, or policies, or proposals which could affect one or more particular Habitats site?	Yes
5	Is the plan a general statement of policy showing only the general political will or intention of the plan-making body, and no effect on any particular Habitats site can reasonably be predicted?	No

4.1.2 When the answer to either questions (1) or (5) is ‘no’, but the answer to any of questions (2), (3) or (4) is ‘yes’, then the requirement for further HRA is identified.

4.1.3 In this case, the answers to questions (1) and (5) are both ‘no’, while the answers to questions (2) to (4) are all ‘yes’. It is therefore confirmed based on the availability of current information that the LBTH Local Plan does therefore require HRA.

5 Review of Habitats sites

5.1.1 The following section provides a summary of the results of the review of Habitats sites data which will form the baseline for subsequent stages of HRA.

5.2 Habitats sites

5.2.1 It is necessary to consider all the Habitats sites that form part of the NSN (SACs, SPAs and proposed or candidate SPAs or SACs, expanded by the NPPF to include Ramsar sites) within a broad area or Zol of the Local Plan and the specific policies therein.

5.2.2 The Zol is defined by the potential effects arising from the project or plan and the available pathways for those effects to reach and impact the interest features of Habitats sites.

5.2.3 In order to identify all strategic corridors where potential direct, indirect and in-combination effects could reasonably be considered possible, a Zol buffer is set up around the primary activities, or in this case Policies, which are likely to affect the qualifying features of Habitats sites.

5.2.4 LBTH has provided an indicative list of site allocations and reasonable alternative to meet the housing needs of the Borough. These have been used as the primary basis on which to set up the Zol and assume:

- dispersal of development across the Borough as shown on Figure 1 (including both Proposed Allocations and Reasonable Alternatives); and
- delivery of at least 52,095 new homes across the borough between 2023 and 2038, which includes a proportion (34,730 homes) set by the London Plan (2021) as part of a ten-year housing target (for the period 2019/20 to 2028/29).

5.2.5 The Zol are set up to reflect the potential impact or effects pathways of the Qualifying features of the Habitats sites. A Zol of 7.2km has been applied around the Borough boundary to identify all habitats sites in proximity, and then refined to within 7.2km of allocated sites identified within the Local Plan. The premise of this approach is that 7.2km represents the average distance travelled for office use, as per the Air Quality Neutral Guidance¹⁹ with specific reference to Inner London (for which LBTH falls within). Whilst average distance travelled is also provided for residential (3.4km) and retail (5.5km) use, the application of 7.2km (reflective of office use in Inner London) is considered equally suitably precautionary to identify potential impacts from other pressures or threats to Habitats sites, when considering Habitats sites for inclusion in Stage 1 Screening

¹⁹ Greater London Authority (2023) London Plan Guidance: Air Quality Neutral [online]. Available at: <https://www.london.gov.uk/sites/default/files/2023-02/Air%20Quality%20Neutral%20LPG.pdf>

- 5.2.6 Consideration has been given to whether this Zol is inclusive of other LSE which may arise, including recreational pressure which may also cover an extensive area. Visitor surveys have shown that this recreational access Zol, when applied to visitor numbers at to the 75th percentile, extends to an approximate maximum 7km figure (depending on survey year and location)(Liley, D 2020) for sites considered in this assessment. The selected 7.2km Zol is therefore considered appropriately precautionary to support the Screening approach for the assessment overall.
- 5.2.7 For air quality considerations and traffic generation or re-distribution, the London Air Quality Neutral (AQN) Guidance²⁰ sets out recommended average journey lengths for key land uses based on their location within London. These are summarised in **Table 5-1** below.
- 5.2.8 For the most part, the applicable values for the LBTH will be those set for ‘Inner London’ and these values have been used to define the bespoke Zol for the site allocations, based on the proposed land uses / development descriptions. However, it is noted that a small part of Tower Hamlets (along the western-most edge) technically falls within the boundary of the Central Activity Zone (CAZ). There are two allocations that sit wholly within the CAZ (allocations 1.1 Bishopsgate Goods Yard and 1.5 London Metropolitan University). As such, the ‘CAZ’ values have been used to define the bespoke Zol for these sites. A third allocation (1.7 Brick Lane and Pedley Street) also straddles the boundary of the CAZ. However, as the majority of this site lies outside of the CAZ, the ‘Inner London’ values are considered most appropriate to the overall setting and have been used for the Zol.

Table 5-1 – Average distance (km) travelled by car per trip

Land Use	CAZ	Inner London	Outer London
Residential	4.2	3.4	11.4
Office	3.0	7.2	10.8
Retail	9.2	5.5	5.4

- 5.2.9 To ensure a conservative approach to the assessment, where a development is mixed-use, a precautionary approach has been applied whereby the worst-case (i.e. longest) average distance travelled has been applied (i.e. 7.2km for Inner London and 9.2km for the CAZ).
- 5.2.10 Three Habitats sites, as presented in Table 5-2, lie within this potential Zol for the LBTH Local Plan, including one SPA, one SAC and one Ramsar site.

²⁰ Mayor of London (February 2023) London Plan Guidance. Air Quality Neutral.

5.2.11 The reasons for designation of the screened-in Habitats sites and their known vulnerabilities are given in Appendix B, which has been collated from the Natura 2000 standard data forms and the Natural England Site Improvement Plans.

5.2.12 With regard to the qualifying features and information on vulnerability of the Habitats sites detailed in Appendix B, the broad conservation objectives for SACs and SPAs are to:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species.*
- *The structure and function (including typical species) of qualifying natural habitats.*
- *The structure and function of the habitats of qualifying species.*
- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.*
- *The populations of qualifying species; and*
- *The distribution of qualifying species within the site.*

5.2.13 Specific conservation objectives for Ramsar sites are not currently available.

5.2.14 The Habitats sites which fall within the identified Zol of the LBTH boundary are listed in Table 5-2.

Table 5-2 – Habitat sites falling within the 7.2km Zol of LBTH boundary

Habitats sites (SPA and Ramsar)	Habitats sites (SAC)
Lee Valley	Epping Forest

5.2.15 The proposed site allocations and their distance in relation to each of the Habitats sites are given in Table 5-3.

Table 5-3 - Proximity of proposed site allocations to Habitats sites identified within the 7.2km Zol

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
1.1	Bishopsgate Goods Yard	Mixed-use, residential-led scheme (500 homes) with a mix of retail, workspace, community and cultural uses and the provision of a leisure facility and an Idea Store (c. 11,500sqm non-residential use).	CAZ	Yes (5.64 km)	No	9.2	Yes (8.3km)	No
1.2	London Dock	Mixed-use, residential-led scheme (1,800 homes) with a mix (21,500sqm) of retail, workspace, community and cultural uses and the provision of a secondary school.	Inner London	Yes (7.15 km)	No	7.2	No	N/A
1.3	Marian Place Hasworks and The Oval	Development should consist of a mixed-use, residential-led scheme (700 homes) with a mix (c.4,000sqm) of retail, workspace, community and cultural uses.	Inner London	Yes (4.35 km)	Yes (6.75 km)	7.2	Yes (6.75 km)	No
1.4	Whitechapel South	Mixed-use, residential-led scheme (837 homes, 425 student rooms) with a mix (c. 93,000sqm) of retail, workspace and community uses.	Inner London	Yes (5.97 km)	No	7.2	No	N/A
1.5	London Metropolitan University	Redevelopment of the university buildings to provide additional teaching space and student accommodation (520 student rooms and 33,500sqm of educational floorspace).	CAZ	Yes (6.47 km)	No	4.2	No	N/A
1.6	Whitechapel North	mixed-use, residential-led scheme (1,225 homes) with a mix of retail,	Inner London	Yes (5.72 km)	No	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		workspace and community uses (at least 4,500sqm).						
1.7	Brick Lane and Pedley Street	Mixed-use, residential-led scheme (800 homes) with a mix of retail, workspace and community uses (up to 35,000sqm non-residential floorspace).	Inner London	Yes (5.56 km)	No	7.2	No	N/A
2.1	Bow Common Lane	Mixed-use, residential-led scheme (1,000 homes) with a mix of retail, workspace, community and cultural uses and sixth form educational centre (2,500sqm non-residential use).	Inner London	Yes (6.1 km)	Yes (6.41 km)	7.2	Yes (6.4km)	No
2.2	Chrisp Street	Mixed-use scheme combining residential uses (650 homes) with an enhanced town centre combining retail, workspace, community and cultural uses (20,000sqm town centre and community use).	Inner London	Yes (7.16 km)	Yes (6.99 km)	5.5	No	N/A
3.1	Ailsa Street	Mixed-use, residential-led scheme (1,450 homes) with a mix of retail, workspace, community and cultural uses (6,500sqm non-residential use).	Inner London	Yes (6.85 km)	Yes (6.3 km)	5.5	No	N/A
3.2	Leven Road	Mixed-use, residential-led scheme (2,800 homes) with a mix of retail, workspace, community and cultural uses, and provision of a secondary school (8,500sqm commercial floorspace).	Inner London	Yes (7.18 km)	Yes (6.37 km)	5.5	No	N/A
3.3	Aberfeldy Estate	Mixed-use, residential-led scheme (1,550 homes) with a mix of retail,	Inner London	Yes (7.05 km)	Yes (6.51 km)	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		workspace, community and cultural uses, and provision of a primary school (3,500sqm)						
3.4	Bromley by Bow	Mixed-use, residential-led scheme (1,300 homes) with a mix of retail, workspace, community and cultural uses, and provision of a primary school, community centre (20,000sqm non-residential use), and improved connections across the River Lea	Inner London	Yes (5.68 km)	Yes (5.31 km)	5.5	No	N/A
3.5	Blackwall Trading Estate and Leamouth Road Depot	Mixed-use, residential- and light industrial-led scheme, with some potential for other commercial uses. (700 homes, 35,000sqm non-residential floorspace, 6,500sqm depot, if needed)	Inner London	No	Yes (6.48 km)	7.2	Yes (6.5km)	No
3.6	Hackney Wick Station	Mixed-use, employment-focused scheme with a mix of residential, retail, workspace, and creative and cultural uses (300 homes on TH site, 500 homes on LLDC site, 6,500sqm non-residential)	Inner London	Yes (3.83 km)	Yes (4.11 km)	7.2	Yes (4.1km)	Yes (5.5km)
3.7	Hepscott Road	Mixed-use, residential-led scheme (525 homes) with a mix of retail, workspace, and creative and cultural uses (11,000sqm commercial/community floorspace), and delivery of a linear park and crossings of the canal.	Inner London	Yes (4.1 km)	Yes (4.43 km)	7.2	Yes (4.4km)	Yes (6.0km)
3.8	Sweetwater	Mixed-use, residential-led scheme (775 homes) with a mix of retail, workspace, and community uses, and provision of a library, nursery, health care facility (4,500sqm commercial/community	Inner London	Yes (4.07 km)	Yes (4.05 km)	7.2	Yes (4.1km)	Yes (4.9km)

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
		floorspace), and bridges across the canal.						
3.9	Teviot Estate	Mixed-use, residential-led scheme (1,200 homes) with a mix of retail, workspace, community and cultural uses, and provision of a primary school (5,000sqm commercial/community floorspace).	Inner London	Yes (6.63 km)	Yes (6.23 km)	5.5	No	N/A
4.1	Aspen Way	Mixed-use, residential-led scheme (1,900 homes) with a mix of retail, workspace, community and cultural uses and the reprovision of a college, community centre, football pitches, and transport depot (5,500sqm non-residential and 21,000sqm educational floorspace).	Inner London	No	No	5.5	No	N/A
4.2	Billingsgate Market	Mixed-use, residential-led scheme (1,600 homes) with a mix of retail, workspace, community and cultural uses and the provision of a secondary school and freight consolidation centre (62,000sqm educational use, 8,300sqm industrial use, 66,000sqm commercial use, and 20,000sqm retail floorspace).	Inner London	No	No	7.2	No	N/A
4.3	Crossharbour	Mixed-use, residential-led scheme (2,250 homes) with a mix of retail, workspace, community and cultural uses and the provision of a health centre, primary school and community centre (25,000sqm non-residential).	Inner London	No	No	5.5	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
4.4	Limeharbour	Mixed-use, residential-led scheme (1,850 homes) with some employment spaces (39.000sqm).	Inner London	No	No	7.2	No	N/A
4.5	Marsh Wall East	Mixed-use, residential-led scheme (2,400 homes) with some employment spaces, and provision of a primary school and a health facility (10,000sqm hotel, 3,300sqm educational use, 45,000sqm commercial, and 10,500sqm retail use).	Inner London	No	No	5.5	No	N/A
4.6	Marsh Wall West	Mixed-use, residential-led scheme with some employment spaces (2,625 homes, 1,000 student units, 800 co-living units, 1,175 hotel rooms and serviced apartments)	Inner London	No	No	3.4	No	N/A
4.7	Millharbour	Mixed-use, residential-led scheme (1,700 homes) with a mix of workspace and community uses, including provision of a primary and secondary school (6,000sqm non-residential use, 3,500sqm educational floorspace).	Inner London	No	No	5.5	No	N/A
4.8	North Quay	Mixed-use scheme with elements of residential (1,250 homes) and employment floorspace (160,000sqm).	Inner London	No	No	7.2	No	N/A
4.9	Reuters	Residential-led scheme (900 homes) with provision of a primary school (2,250sqm commercial use/public house).	Inner London	No	No	3.4	No	N/A

Site Ref	Site Name	Proposed Land Use / Indicative Capacities	Inner London or CAZ?	Allocation Within 7.2km Zol, With Distance if Inside Zol		Applicable / Refined AQ Zol (km)	Habitat Site within Refined AQ ZOI?	
				Lee Valley Spa/Ramsar	Epping Forest SAC		Distance Measured as Crow Flies	Estimated Distance Measured 'on road'
4.1	Riverside South	Mixed-use scheme with elements of residential (1,650 homes) and employment floorspace (56,000sqm).	Inner London	No	No	7.2	No	N/A
4.11	Westferry Printworks	Residential-led scheme with provision of a secondary school (950 homes, 14,500sqm educational use, 2,000sqm commercial use, 4,000sqm community use, 1,500sqm retail use).	Inner London	No	No	7.2	No	N/A
4.12	Wood Wharf	Mixed-use, residential-led scheme (3,600 homes) with a mix of retail, workspace, community and cultural uses and the provision of a primary school and health facility and an expansion of the Idea Store (165-265,000sqm commercial floorspace).	Inner London	No	No	7.2	No	N/A
4.13	10 Bank Street	Mixed-use, residential- and commercial-led scheme (575 homes, 41,000sqm commercial/town centre uses)	Inner London	No	No	7.2	No	N/A
4.14	Westferry and Park Place	Mixed-use, residential- and commercial-led scheme (550 homes, 19,000sqm commercial/town centre floorspace)	Inner London	No	No	7.2	No	N/A

5.3 Information relating potential effects on Habitats sites

- 5.3.1 Table 5-4 overleaf summarises pressures and threats listed on the Site Improvement Plans (SIPs) for SPAs and SACs that will need to be considered during screening and Appropriate Assessment (if required) of the Local Plan.

Table 5-4 - Pressures and threats listed on Habitats sites SIPs²¹

Impacts highlighted as red should be given primary consideration in screening and Appropriate Assessment of the Local Plan policies, and those highlighted green are less likely to be considerations in screening and Appropriate Assessment of the Local Plan (note that abbreviations are those pressures and threats listed in the Joint Nature Conservation Committee (JNCC) data sheet for the respective Habitats site).

Site Name	Air pollution: impact of atmospheric nitrogen deposition	Public access/ disturbance	Hydrological changes	Inappropriate scrub control	Inappropriate water levels	Water pollution	Inappropriate cutting/mowing	Invasive species	Changes in species distribution	Disease	Fisheries : Fish stocking	Undergrazing
Lee Valley SPA and Ramsar ²²	T	T	T	T		T	T	T			T	
Epping Forest SAC ²³	P	P			T	T		P/T	T	T		P

²¹ P = Pressure, T = Threat

²² Natural England (2014) *Site Improvement Plan: Lee Valley (SIP118)* [online]. Available from: <https://publications.naturalengland.org.uk/publication/5864999960444928>

²³ Natural England (2016) *Site Improvement Plan: Epping Forest (SIP076)* [online]. Available from: <https://publications.naturalengland.org.uk/publication/6663446854631424>

6 Approach to Stage 1 Screening

6.1 Guidance

- 6.1.1 Government guidance and Court rulings have confirmed that the level of detail in the HRA of a plan, whilst meeting the relevant requirements of the Habitats Regulations, should be appropriate to the level (or tier) of plan or project that it addresses.
- 6.1.2 The guidance referred to in Section 2.5 has been referred to in undertaking the Stage 1 screening of the LBTH Local Plan policies. The approaches set out by the guidance have been interpreted to the level of detail available within the objectives, policies and description of projects based on the descriptions contained within the Local Plan, noting that at its current stage, the Plan is a high-level document. At a greater level of detail, and as normally required with specific project level HRAs for example, the HRA stages have more specific data requirements.

6.2 Air Quality Input

- 6.2.1 The sensitivity of Habitats sites to changes in air quality is fundamental to the Stage 1 screening of the LBTH Local Plan policies. The sensitivity of the identified Habitats sites has been informed by the review of identified pressures and threats (**Table 5-4**) and a review of the Air Pollution Information Service (APIS)²⁴.
- 6.2.2 A detailed assessment of air quality / air pollution impact pathways has been provided in the associated *Air Quality Information Report to Support Habitats Regulations Assessment*, (WSP 2024) and should be read in conjunction with this report. Findings and conclusions are summarised here, where relevant.

6.3 In-Combination Assessment

- 6.3.1 It is a requirement of the Habitats Regulations to consider the effects of projects or plans “in combination” at the screening stage. Articles 24, 63 and 105 of the Habitats Regulations require Natural England and other competent authorities to consider the effects of plans or projects alone and in combination with other plans or projects. The ‘in-combination’ requirement is undertaken in order to make sure that prior to their authorisation the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.

²⁴ Air Pollution Information Service. Available at [Air Pollution Information System | Air Pollution Information System \(apis.ac.uk\)](https://www.apis.ac.uk)

6.3.2 The landmark Waddenzee judgment provides a clear interpretation of the legislation. Paragraphs 53 and 54 of the Judgment state:

6.3.3 *“according to the wording of that provision [Article 6(3) of the Habitats Directive] an Appropriate Assessment of the implications for the site concerned of the plan or project must precede its approval and take into account the cumulative effects which result from the combination of the plan or project with other plans or projects in view of the sites conservation objectives. Such an assessment therefore implies that all the aspects of the plan or project which can, individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field.”*

6.3.4 Table 6-1 outlines the types of plans and projects that should be considered in an in-combination assessment:

Table 6-1 - Types of plans and projects considered at “In-combination” assessment.

<ul style="list-style-type: none"> ▪ The incomplete or non-implemented parts of plans or projects that have already commenced;
<ul style="list-style-type: none"> ▪ Plans or projects given consent or given effect but not yet started;
<ul style="list-style-type: none"> ▪ Plans or projects currently subject to an application for consent or proposed to be given effect;
<ul style="list-style-type: none"> ▪ Projects that are the subject of an outstanding appeal;
<ul style="list-style-type: none"> ▪ Ongoing plans or projects that are the subject of regular review;
<ul style="list-style-type: none"> ▪ Any draft plans being prepared by any public body;
<ul style="list-style-type: none"> ▪ Any proposed plans or projects published for consultation prior to application;
<ul style="list-style-type: none"> ▪ Projects being proposed or being undertaken by a competent authority itself which require no external authorisation.

6.3.5 With reference to Section 2.3, case law and methodology relating to HRA has changed rapidly over recent years. One of the most notable changes as a result of CJEU rulings has been the clarification that mitigation measures cannot be included in HRA Stage 1 (Screening). As this was previously a common practice, many HRAs will have concluded no LSE on Habitats sites, based on the likely effectiveness of mitigation measures. The outcome of this is that preceding plan-level HRAs can be unreliable in terms of adopted conclusions of ‘no LSE’.

6.3.6 Based on this complexity and need for consistency in the assumptions relating to mitigation, a precautionary approach has been adopted when considering the HRA conclusions of overlapping plans and projects in-combination.

7 HRA Stage 1 Screening of the Local Plan Policies

- 7.1.1 The pressures and threats set out in Table 5-3 have been reviewed for those likely to arise from the policies within the Local Plan and in particular the proposed delivery of dwellings within the Borough. Those considered relevant to this type and scale of development have been identified as:
- air pollution: impact of atmospheric nitrogen deposition;
 - public access/ disturbance/ recreational pressures; and
 - hydrological changes
- 7.1.2 The pressures and threats set out in Table 5-3 which are considered at this early stage to be unlikely to arise from the policies as presented and the draft development allocations (except where this directly results secondarily from the pressures and threats included above) and are not considered further in this screening exercise, are: inappropriate water levels; inappropriate scrub control; water pollution; inappropriate cutting / mowing; invasive species; changes in species distribution; disease; fisheries: fish stocking and undergrazing.
- 7.1.3 Further information relating to those pressures and threats identified as relevant to the LBTH Local Plan and the development allocation targets are also presented below.

7.2 Potential Air Quality Effects

- 7.2.1 Consideration has been given to the potential effect of changes in air quality within the identified Habitats sites, where they fall within the specified Zol, with a particular focus on qualifying features, including:
- changes in NO_x and NH₃ concentrations in relation to the Critical Levels for these pollutants; and
 - Changes in N deposition in relation to the relevant Critical Loads.

Critical Levels for NO_x and NH₃

- 7.2.2 Critical Levels are used to estimate the exposure of sensitive vegetation and ecosystems to some important airborne pollutants, below which significant harmful effects are not expected to occur. These levels have been adopted by the European Union and the United Nations Economic Commissions for Europe (UNECE) and are used as regulatory standards and are expressed in units of µg/m³ (micrograms per cubic metre).
- 7.2.3 Critical Levels are not habitat specific, as with Critical Loads (see below), but have been set to cover broad vegetation types. For NO_x concentrations, there are Critical Levels given for both annual and 24 hour mean concentrations, irrespective of habitat type. For NH₃, there are two values relevant to annual mean concentrations, one (1 µg/m³) where lichens and bryophytes are present (and form a key part of the ecosystem integrity), which are

particularly sensitive to changes in NH₃, and another (3µg/m³ with an uncertainty range of 2 – 4µg/m³) for all remaining vegetation.

7.2.4 The relevant Critical Levels for NO_x and NH₃ relating to the protection of vegetation and ecosystems are summarised in Table 7-1.

Table 7-1 - Relevant NO_x and NH₃ Critical Levels for the Protection of Vegetation and Ecosystems

Pollutant		Concentration (µg/m ³)	Averaging Period
Nitrogen oxides (NO _x)		30	Annual Mean
		75	24-hours
Ammonia (NH ₃)	Where lichens and bryophytes are present (and form a key part of the ecosystem integrity)	1	Annual Mean
	All other vegetation	3 (with uncertainty of 2-4)	Annual Mean

CRITICAL LOADS

7.2.5 In addition to the direct effect of pollutant concentrations in the air, vegetation can also be affected by the deposition of pollutants and particles onto both the ground and vegetation. Close to roads, N deposition can be of concern for sensitive ecological sites as it can result in a variety of adverse effects depending on the habitats present (e.g. interfering with photosynthesis, increasing acidification, altering species composition etc).

7.2.6 In the UK, Critical Loads have been established for a wide range of habitat and vegetation types, reflecting the variation in ecosystem responses to N deposition. Details of the Critical Loads relevant to a specific habitat or designated site are

available from the Air Pollution Information Systems (APIS) website²⁵. In relation to Critical Loads, N Dep is expressed in units of kilograms of nitrogen per hectare per year (Kg N/ha/yr).

- 7.2.7 A summary of the relevant Critical Loads for the identified Habitats sites is provided in Appendix C for both SPAs and SACs.

BASELINE CONDITIONS AT SITES WHERE AIR POLLUTION IS IDENTIFIED AS A PRESSURE AND/OR THREAT

- 7.2.8 Lee Valley SPA & Ramsar are a Habitats site where air pollution is cited as an identified threat. While for Epping Forest, air pollution is identified to present a pressure to the Habitat site, as per **Table 5-4**.

NO_x Concentrations

- 7.2.9 Background annual mean NO_x values for Epping Forest SAC and Lee Valley SPA & Ramsar site have been taken from the national maps provided by the Department for Environment Food and Rural Affairs (Defra)²⁶, where background concentrations of NO_x have been mapped at a grid resolution of 1x1km for the whole of the UK, and are provided in Table D-1 in Appendix D.
- 7.2.10 The Critical Level is predicted to be met at background locations across the vast majority of Lee Valley SPA & Ramsar with total NO_x concentrations ranging from a minimum of 11.9µg/m³ to a maximum of 30.6µg/m³. Background NO_x concentrations are predicted to exceed the Critical Level in the 1x1km grid square covering the part of the Lee Valley SPA and Ramsar Site where it meets the heavily trafficked A503 (Forest Road).
- 7.2.11 The Critical Level is predicted to be met at background locations across the majority of Epping Forest SAC with total NO_x concentrations ranging from a minimum of 15.0µg/m³ to a maximum of 35.7µg/m³. Background concentrations are predicted to exceed the Critical Level in parts of the SAC, near the heavily trafficked A406 (North Circular Road) and the A104 and A114 (Whipps Cross Road).
- 7.2.12 It should be noted that background concentrations are representative of concentrations that can be experienced away from a pollution source. Therefore, within increasing proximity to a pollution source, such a busy road, annual mean NO_x concentrations will increase such that there could be the potential for exceedances of the Critical Level for this pollutant at locations within the Lee Valley SPA & Ramsar

²⁵ <http://www.apis.ac.uk/>

²⁶ Defra (2022) *Background Mapping data for local authorities – 2018* [online]. Available at: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2018>

Site and Epping Forest SAC that are near to the road edge, and the use of background annual mean NO_x concentrations in the screening process should be treated with caution.

NH₃ Concentrations

- 7.2.13 From an initial review of the data provided in Appendix C for the Lee Valley SPA & Ramsar, the relevant Critical Level for NH₃ in relation to habitats supporting *Anas clypeata*, *Anas strepera*, and *Botarus stellaris* is 3µg/m³. Baseline concentrations of annual mean NH₃ within Lee Valley SPA and Ramsar indicate that the relevant Critical Level is currently being met.
- 7.2.14 The initial review of data provided in Appendix C also indicates that baseline concentrations of annual mean NH₃ within Epping Forest SAC are above the relevant Critical Levels listed for the following habitat types:
- European Dry Heaths where both the minimum and maximum value indicate the potential for exceedances of the Critical Level of 1µg/m³; and
 - Northern Atlantic wet heaths with *Erica tetralix* where the maximum and minimum values all indicate exceedances of the Critical Level of 1µg/m³.
- 7.2.15 For Atlantic acidophilous beech forests, the relevant Critical Level for NH₃ is 1 or 3µg/m³, depending on whether lichens or bryophytes are present. The minimum and maximum baseline concentrations of annual mean NH₃ indicate that a Critical Level of 1µg/m³ is being exceeded but a Critical level of 3µg/m³ is being met. Therefore, there is a risk of exceeding the Critical Level where lichens or bryophytes are present.
- 7.2.16 The relevant Critical Level for NH₃ for both *Lucanus cervus* (Stag beetle) and *Triturus cristatus* is 3µg/m³ which is relevant to the habitat which supports these species. Baseline concentrations of annual mean NH₃ within Epping Forest SAC indicate that the relevant Critical Level for both *Lucanus cervus* and *Triturus cristatus* is currently being met.
- 7.2.17 Based on the above and with reference to LBTH Local Plan policies targeting new development which could give rise to additional traffic and/or traffic re-distribution:
- Effects on Lee Valley SPA and Ramsar from NH₃ are not anticipated due to the relevant Critical Levels for NH₃ being met within this Habitats site.
 - The potential for effects on Epping Forest SAC due to increased NH₃ as a result of the emerging LP cannot be discounted due to some identified exceedances of the Critical

Level, particularly where lichens and bryophytes may be present. This also takes into account that background concentrations of NH₃ are forecast to increase year on year²⁷.

N Deposition

7.2.18 The N Dep values presented in Appendix C indicate that:

- For Lee Valley SPA, only *Botaurus stellaris* (Bittern) has an established Critical Load for N Dep. The lower Critical Load for rich fens (the relevant habitat supporting the species) of 5 kg/N/ha/year is being exceeded across the SPA, whereas the upper Critical Load of 25 kg/N/ha/year is being met throughout the site.
- For Epping Forest SAC, both the upper and lower Critical Load values are exceeded for all habitats identified (wet heath and European dry heaths, which have a Critical Load range of 5 – 15 kg/N/ha/year, and Atlantic acidophilous beech forests, which have a Critical Load range of 10 –15 kg/N/ha/year). In addition, both the lower and upper Critical Load values for broadleaved deciduous woodland, the supporting habitat for *Lucanus cervus* (Stag beetle), are exceeded within the Epping Forest SAC.

7.2.19 This is not to say that all these areas will be significantly impacted by LBTH Local Plan but it does highlight areas that will be particularly sensitive to any changes in air quality as a result of the LBTH Local Plan.

Public Access / Disturbance

7.2.20 As part of the screening exercise, consideration has also been given to the sensitivities of the Habitats sites to public access and disturbance. Development in proximity to these sites can lead to an increase in visits to the sites, with the result that additional pressures can arise including increased incidence of fire, disturbance to roosting, feeding and breeding birds, trampling and increased predation rates in heathland environments²⁸.

7.2.21 The Habitats sites identified in this screening include those designated for habitats, specifically heathland and woodland, those designated for wetland bird species, and sites designated for invertebrate interest. The habitats or qualifying features of the Habitats sites are therefore vulnerable to additional pressures from public access or disturbance through different mechanisms.

²⁷ <https://data.jncc.gov.uk/data/04f4896c-7391-47c3-ba02-8278925a99c5/JNCC-Report-665-FINAL-WEB.pdf>

²⁸ Underhill-Day, 2005 *A literature review of urban effects on lowland heaths and their wildlife* English Nature Report 623

- 7.2.22 The location of the identified Habitats sites in South East England places them in a location of acute pressure from high population density and predicted growth, with the corresponding identified trend to visit these sites more²⁹.

Hydrological Changes

- 7.2.23 Consideration has also been given to hydrological changes in relation to Lee Valley SPA and Ramsar that may arise as a result of the new Local Plan. This is as a result of development supported by the new Local Plan likely to result in an increased demand for water which could indirectly impact upon Habitat Sites.
- 7.2.24 Lee Valley SPA and Ramsar is water resource sensitive and part of it (Walthamstow reservoirs) form part of the public water supply (PWS) system in London and therefore an increase in water demand e.g via abstraction etc. as a result of the predicted growth arising from LBTH Local Plan may result in hydrological changes to this Habitat Site.
- 7.2.25 The site features for Epping Forest are not considered to be 'water resource sensitive' with hydrological changes not listed as a pressure or threat for this SAC. Therefore, Epping Forest will not be vulnerable to changes in abstraction that may be associated with the growth supported by the new Local Plan. As such, Epping Forest will not be considered further within this screening exercise with regards to hydrological changes.

Consultation With Natural England

- 7.2.26 As part of the Integrated Impact Assessment (IIA) - Scoping Report for LBTH Local Plan, Natural England were consulted in May 2023. A response from Natural England received in July 2023 stated the following:

'Natural England have no comments to make on this consultation'. 'Once further work develops on which sites will be taken forward for allocation please consult Natural England so we can offer advice on their suitability with regard to impacts on and opportunities for the natural environment.'

- 7.2.27 It is considered that consultation will be undertaken following the submission of the HRA Screening document.

Summary of Discussion on Pressures and Threats

- 7.2.28 The screening exercise has considered the high-level pressures and threats to each site associated with public access and disturbance based on published research and

²⁹ Lake, S.; Liley, D.; Saunders, P. 2020 *Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches*. Unpublished report by Footprint Ecology

reports for individual sites and the effects of access generally on habitats and species.

Table 7-2 - Discussion of Identified Pressures and Threats

Pressure/threat	Habitats sites concerned	Discussion
<p>Air pollution: impact of atmospheric nitrogen deposition</p>	<p>Lee Valley SPA & Ramsar</p>	<p>Seventeen of the allocated sites fall within the (non-refined) 7.2km Zol of the Habitats Site. The closest site is approximately 3.8km (as the crow flies) from Lee Valley SPA & Ramsar.</p> <p>The SIP states: <i>Nitrogen deposition exceeds site relevant critical loads.</i></p> <p>Data from Defra and APIS confirms the potential for exceedances of both the Critical Level and Critical Loads for NO_x concentrations and N deposition, respectively.</p>
	<p>Epping Forest SAC</p>	<p>Twelve of the allocated sites fall within the (non-refined) 7.2km Zol of the Habitats site. Notably, the closest site is approximately 4.2km (as the crow flies) from Epping Forest SAC.</p> <p>The SIP states: <i>Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts.</i></p> <p>Data from Defra and APIS confirms the potential for exceedances of both the Critical Level and Critical Loads for NO_x concentrations and N deposition, respectively.</p> <p>Similarly, there is the potential for Critical Levels for NH₃ to be exceeded for Northern Atlantic wet heaths, European dry heaths, and Atlantic acidophilous beech forests (where lichens and bryophytes are present).</p>

Pressure/threat	Habitats sites concerned	Discussion
<p>Public access/ disturbance</p>	<p>Lee Valley SPA & Ramsar</p>	<p>There are 17 Proposed Allocations that fall within the 7.2km Zol. The closest of which is Hackey Wick Station approximately 3.83km to Lee Valley SPA and Ramsar.</p> <p>Public access and disturbance are listed as a threat on the designated site, specifically with regards to populations of Bittern, Gadwall and Shoveler. The SIP states: <i>'Areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly'</i></p> <p>The proposed measures in the SIP to address this is:</p> <ul style="list-style-type: none"> - <i>Investigate whether there is a need for change to access management; and</i> - <i>Agree appropriate management measures with stakeholders to align with best practice.</i>
	<p>Epping Forest SAC</p>	<p>Natural England has issued Overarching Standard Advice for Development Applications within Epping Forest District³⁰.</p> <p>The guidance sets out the following with regards to recreational disturbance: <i>As part of the work required to produce a mitigation strategy for recreational pressure, Footprint Ecology have undertaken visitor surveys to identify a recreational Zol and to identify the distance the majority of visitors will travel to visit Epping Forest SAC. The 2017 report</i></p>

³⁰ [Overarching standard advice for development applications within Epping Forest District \(eppingforestdc.gov.uk\)](http://eppingforestdc.gov.uk)

Pressure/threat	Habitats sites concerned	Discussion
		<p><i>identified that 75% of visitors travelled up to 6.2Km to the SAC and this distance has been used in the interim period as the Zol. Following further survey work carried out in Autumn 2019 Natural England advised that it was appropriate to continue using the distance of 6.2km provided that the intention was to carry out further survey work in June 2021.</i></p> <p><i>It is Natural England’s understanding that no further survey work has been undertaken. It is also unclear, if it were to be undertaken, how representative data collected would be given the impact of the coronavirus (COVID-19) on national/international travel and recreational habits. We therefore advise that, in the absence of further evidence, it remains appropriate to continue to use 6.2km as the Zol for Epping Forest SAC at this time, although support the view that further summer surveys should be undertaken as soon as is reasonably practicable. Larger developments on the periphery of this 6.2km zone will need to consider the implications of the best and most recent available evidence, the need for further survey data and any potential recreational impacts in their HRAs.</i></p> <p>However, in relation to the above, it should be noted that this advice is in relation to Epping Forest District which is considered to fall within Outer London, whilst Tower Hamlets is considered to be Inner London, and as such, the distance travelled is likely to vary, with shorter trip lengths for Inner London boroughs.</p> <p>Twelve Proposed Allocations fall within the 7.2km Zol, with Sweetwater the closest Proposed Allocation, located approximately 4.07km away.</p>

Pressure/threat	Habitats sites concerned	Discussion
		<p>Public access and disturbance are listed as both pressures and threats on the designated site and specifically the following habitat features: H4010 Wet heathland with cross-leaved heath, H4030 European dry heaths, H9120 Beech forests on acid soils. The SIP states:</p> <p><i>‘Epping Forest is subject to high recreational pressure. There is a high general level of footfall in Epping Forest throughout the year, including periods of significant use, and resulting in a diverse range of impacts which include mountain biking and unmanaged fires. Population and visitor numbers are likely to continue to increase.’</i></p> <p>The proposed measures in the SIP to address this is:</p> <ul style="list-style-type: none"> - Identify key areas that are subject to recreational impacts; and - Agree and implement a site-specific recreational management plan to ensure SAC features are protected and maintained.
<p>Hydrological changes</p>	<p>Lee Valley SPA & Ramsar</p>	<p>As a result of the predicted growth in LBTH resulting from the Local Plan, there is the risk of hydrological changes to Lee Valley SPA and Ramsar.</p> <p>Hydrological changes are listed as a threat on the designated site, specifically with regards to populations of bittern, gadwall and shoveler. The SIP states:</p> <p><i>‘Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.’</i></p> <p>The proposed measures in the SIP to address this is:</p>

Pressure/threat	Habitats sites concerned	Discussion
		<ul style="list-style-type: none"> - <i>Define more clearly the water level requirements for the habitats supporting the SPA bird features; and</i> - <i>As a follow up to the above, agree the necessary water level management with key stakeholders for significant water bodies.'</i>

7.2.29 Table 7-3 sets out the findings of the Stage 1 Screening exercise and identifies where the potential for LSE arises.

Table 7-3 - Screening

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
Delivering on the Local Plan						
DV1	<i>Areas of growth and opportunity within Tower Hamlets</i>	This policy sets out the spatial strategy for growth and development within the borough for the life of the plan and sets out the proposed site allocations and growth areas.	All Habitats Sites	This policy is to ensure the local plan policies are effective by following a framework that has been prepared to set out the key performance indicators that will help track the delivery and performance of the Local Plan.	No LSE therefore no in-combination effect.	Screened out
DV2	<i>Delivering sustainable growth in Tower Hamlets</i>	This policy seeks to ensure development is sustainable and accessible, creates healthy environments, promotes environmental improvements and contributes towards a cleaner and greener future (i.e. through zero carbon developments, circular economy principles, low carbon energy, sustainable travel, mitigating impacts of poor air quality).	All Habitats Sites	This is a positive policy that seeks to promote sustainable development. It is compatible with the aims of conserving the integrity of Habitats sites by helping to ensure the delivery of sustainable development.	No LSE therefore no in-combination effect.	Screened out
DV3	<i>Healthy communities</i>	This policy sets out a requirement for development to contribute to a healthy built environment and promote active travel to encourage positive health and well-being. It also requires major development to complete	All Habitats Sites	A positive policy that seeks to improve human health benefits within the borough as a result of development.	No LSE therefore no in-combination effect.	Screened out

³¹ Where there is an identified pressure or threat.

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		Health Impact Assessments as part of planning applications.				
DV4	<i>Planning and construction of new development</i>	This policy aims to minimise the impact of development on the local environment and existing communities. It sets out requirements for developers to employ sustainable construction methods and for major development to sign up to the Code of Construction Practice and proposed measures to mitigate potential impacts.	All Habitats Sites	This is a broad policy that relates to development within LBTH. Whilst it is noted that development has potential to impact upon Habitats sites (atmospheric pollution, increased visitor pressures and water resource conflicts), this policy does not explicitly provide for development, but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out
DV5	<i>Developer contributions</i>	This policy establishes the requirements for financial contributions from developers to fund improvements to infrastructure and the environment.	All Habitats Sites	This policy is associated with securing developer contributions on infrastructure delivery within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
DV6	<i>Social value</i>	This policy sets out the council's intentions to maximise delivery of social value through development. Requires major development to submit a social value strategy.	All Habitats Sites	A positive policy that seeks to promote economic wellbeing, improve social progress and protect and enhance the natural and built environment in the borough as a result of development.	No LSE therefore no in-combination effect.	Screened out
DV7	<i>Utilities and digital connectivity</i>	The policy aims to ensure development is supported by appropriate utilities and has access clean heat and energy and quality internet/mobile connectivity.	All Habitats Sites	This policy relates to provision of utilities and broadband access. No effect pathways.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
DV8	<i>Site allocations</i>	This policy sets out some requirements for all proposed site allocations (as included in section 4 of the Local Plan), including delivering required infrastructure, provision of publicly accessible open space, social infrastructure, buffer spaces for watercourse etc.	All Habitats Sites	This policy sets out the specific development requirements for the proposed site allocations rather than its locational distribution. It does contain measures that could be positive for Habitats sites such as public open space provision and CIL.	No LSE therefore no in-combination effect.	Screened out
Homes for our Community						
HF1	<i>Meeting housing needs</i>	This policy sets out the strategic housing targets to ensure Tower Hamlets housing need are met. Policy supports new housing on windfalls sites.	All Habitats Sites	<p>The quantum of development across the Borough where known, is set out in the Proposed Allocations and Reasonable Alternatives identified, the closest of which 3.78km from the nearest screened in Habitats site (Figure 1).</p> <p>Any development within LBTH's administrative area that falls within the indicative 7.2km ZOI has the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites, and hydrological changes via increased abstraction (Lee Valley SPA and Ramsar only). This policy could result in development in proximity to Habitats sites which could lead to LSE.</p>	<p>Any increase in traffic due to development has the potential to give rise to 'in-combination' effects with other plans and projects.</p> <p>Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes, and increased abstraction may result in hydrological changes.</p>	Screened in

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
HF2	<i>Affordable housing and housing mix</i>	This policy establishes a target of 50% of new homes to be affordable.	All Habitats Sites	This is a development management policy and a framework to guide the affordable housing requirement in LBTH. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF3	<i>Protection of existing housing</i>	This policy aims to protect existing housing and to safeguard supply of self-contained homes.	All Habitats Sites	This is a development management policy and a framework to guide the protection of existing housing in LBTH. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF4	<i>Supported and specialist housing</i>	This policy seeks to ensure adequate supply of specialist housing.	All Habitats Sites	This is a development management policy to guide LBTH when providing for specialist and supported living housing as well as housing for older people. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF5	<i>Gypsy and traveller accommodation</i>	The policy provides a site for Gypsy and Traveller accommodation and establishes criteria that allows for the consideration of additional accommodation should a need be identified.	All Habitats Sites	This is a development management policy to guide LBTH when providing for Gypsy and Traveller needs. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF6	<i>Purpose-built student accommodation</i>	This policy sets out strict criteria to manage purpose-built student accommodation, so as not to compromise the ability to meet other needs. It	All Habitats Sites	This is a development management policy to guide LBTH on the student accommodation needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		requires 50% to be affordable accommodation.				
HF7	<i>Large-scale purpose-built shared living</i>	This policy set out criteria for purpose built shared accommodation and a target for 50% to be affordable.	All Habitats Sites	This is a development management policy to guide LBTH on the shared living housing needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF8	<i>Housing with shared facilities (houses in multiple occupation)</i>	This policy sets out criteria for houses with multiple occupations and aims to ensure they contribute to maintaining mixed and inclusive communities.	All Habitats Sites	This is a development management policy to guide LBTH on the shared living housing needs within the Borough. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
HF9	<i>Housing standards and quality</i>	This policy aims to ensure housing meets the appropriate design, space, and amenity standards.	All Habitats Sites	This is a development management policy to guide LBTH on ensuring the housing standards and quality are met. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Clean and Green Future						
CG1	<i>Mitigating and adapting to a changing climate</i>	This policy supports the Council's commitment to becoming net zero carbon by 2045 and sets out expectations for developments to help reduce the impacts of climate change, for example by reducing carbon emissions, mitigating against flooding and overheating, mitigating and improving air quality.	All Habitats Sites	A positive policy addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a low and net zero carbon future. Policy also looks to reduce exposure to poor air quality and contribute towards the measures outlined within Tower Hamlets Air Quality Action Plan. Therefore, policy likely to be of benefit to the Habitats sites if this includes the provision of more sustainable transport	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
				methods by reducing the need for private car use.		
CG2	<i>Low energy buildings</i>	The policy aims to ensure development within Tower Hamlets are designed and constructed to be Net Zero Carbon in operation and heat/energy efficient.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development.	No LSE therefore no in-combination effect.	Screened out
CG3	<i>Low carbon energy and heating</i>	The policy requires development to use low carbon heating and clean energy supply.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development and reliance of fossil fuels as a heat source.	No LSE therefore no in-combination effect.	Screened out
CG4	<i>Embodied carbon, retrofit and the circular economy</i>	The policy establishes that development must consider Embodied Carbon across its lifetime and utilise Modern Methods of Construction. Retrofit and refurbishment is prioritised over demolition and new construction.	All Habitats Sites	This is a positive policy that will help to reduce energy demand from development.	No LSE therefore no in-combination effect.	Screened out
CG5	<i>Overheating</i>	The policy requires development to ensure they are designed to avoid overheating and excessive heat generation.	All Habitats Sites	This is a positive policy by helping to reduce overheating, therefore helping to address the climate emergency.	No LSE therefore no in-combination effect.	Screened out
CG6	<i>Managing flood risk</i>	The policy sets design requirements and criteria to ensure development does not increase flooding and itself is resilient to flooding.	All Habitats Sites	This is a positive policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out
CG7	<i>Sustainable drainage</i>	The policy ensures development to manage its effects on the water environment and reduce	All Habitats Sites	This is a positive policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		the risk of surface water flooding.				
CG8	<i>Water efficient design</i>	This policy aims to reduce pressure on fresh water and waste water systems.	All Habitats Sites	This is a positive policy that seeks to reduce water usage in the Borough.	No LSE therefore no in-combination effect.	Screened out
CG9	<i>Air quality</i>	This policy requires all development to mitigate against poor air quality and contribute to improvements in air quality within Tower Hamlets. Development should be at least air quality neutral, with major proposals and those within Focus Areas should be air quality positive.	All Habitats Sites	This is a positive policy that is to drive significantly improved environmental conditions with regards to air quality in the LBTH area.	No LSE therefore no in-combination effect.	Screened out
CG10	<i>Noise and vibration</i>	Policy sets design requirements for development to manage noise and vibration from proposed development and existing sources.	All Habitats Sites	This is a positive policy that seeks to reduce noise and vibration as a result of new development in the Borough.	No LSE therefore no in-combination effect.	Screened out
CG11	<i>Contaminated land</i>	The policy seeks to protect the health of Towers Hamlets residents and the environment from the impacts of past and present land uses.	All Habitats Sites	This is a positive policy that will help to protect waterbodies within the Borough from contamination.	No LSE therefore no in-combination effect.	Screened out
<i>People, Places and Spaces</i>						
PS1	<i>Design-and infrastructure-led approach to development</i>	This policy aims to ensure that new development is well-designed and proposes sustainable capacities and densities. It incorporates the requirements of the new London Plan for all sites to	All Habitats Sites	This policy provides positive provision and is a key aspect of sustainable development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		optimise their capacity through a design-led process.				
PS2	<i>Tall buildings</i>	This policy seeks to guide and manage the location, scale and development of tall buildings in the Borough in line with the London Local Plan.	All Habitats Sites	This is a development management policy relating to tall buildings which protects local views and landmarks. No effect pathways are identified as present due to no sites designated for birds or similarly-sensitive qualifying features being present within the Borough boundary or immediate surrounds	No LSE therefore no in-combination effect.	Screened out
PS3	<i>Securing design quality</i>	The policy sets out the general design criteria for new developments to be assessed against. It outlines the key elements of high-quality design so that new development creates buildings, spaces and places that are sustainable, accessible attractive, durable, and well-integrated into their surroundings and responsive to the character of the area, thus contributing to a better quality of life.	All Habitats Sites	This policy provides positive provision and is a key aspect of sustainable development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS4	<i>Attractive streets, spaces and public realm</i>	This policy aims to deliver an attractive, accessible and well-designed network of streets and spaces which promote social interaction and inclusion, which people of all ages and abilities can value and enjoy, and where they feel safe and comfortable.	All Habitats Sites	This is a positive policy that seeks to promote the use of amenity and public realm spaces within the Borough, therefore potentially diverting pressure away from the Habitats Sites.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
PS5	<i>Creating inclusive places</i>	This policy encourages all new development to consider inclusive design as part of the developmental process.	All Habitats Sites	A development management policy relating to consideration for gender inclusive design within the borough.	No LSE therefore no in-combination effect.	Screened out
PS6	<i>Heritage and the historic environment</i>	This policy aims to protect the borough's heritage and character, and sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic to ensure that its distinctive character is maintained.	All Habitats Sites	A development management policy relating to conserving Heritage assets. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
PS7	<i>World heritage sites</i>	This policy aims to protect the borough's heritage and character, and sets out how the historic environment should inform development, how planning applications will be assessed and how opportunities can be taken to improve the condition of the borough's historic to ensure that its distinctive character is maintained.	All Habitats Sites	A development management policy relating to conserving World Heritage sites. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
PS8	<i>Shaping and managing views</i>	This policy aims to ensure that important views within, into, and across the borough are preserved through appropriate management of development.	All Habitats Sites	This policy is in relation to protecting designated views. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS9	<i>Shopfronts</i>	This policy seeks to ensure that shopfronts are attractive, well designed	All Habitats Sites	This policy provides the principles for the aesthetics associated with retail	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		and make a positive contribution to the surrounding streets, spaces and public realm and thereby enhance the overall character and appearance of the borough.		development within town centres. No effect pathways present.		
PS10	<i>Advertisements, hoardings and signage</i>	This policy aims to ensure advertisements, hoardings and signage positively activate the streetscape and enhance the visual appearance of their host buildings or structures.	All Habitats Sites	This policy provides the principles for the aesthetics associated with advertising within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
PS11	<i>Siting and design of telecommunications infrastructure</i>	This policy aims to ensure that the design and location of telecommunications equipment does not create a safety hazard or detract from the character of their surroundings, taking into consideration the potential impacts on the amenity of the area and local residents.	All Habitats Sites	A development management policy relating to consideration for the positioning of telecommunications equipment within the borough.	No LSE therefore no in-combination effect.	Screened out
<i>Employments and economic growth</i>						
EG1	<i>Creating investment and jobs</i>	This policy sets out the approach to employment provision in relation to the level and distribution of jobs across the borough over the period to 2038 ensuring successful and sustainable local and sub-regional economies whilst promoting and facilitating a range of employment spaces.	All Habitats Sites	This is a broad policy that relates to LBTH's economy. Whilst it is noted that economic growth has potential to impact upon Habitats sites (atmospheric pollution and water resource conflicts), this policy does not explicitly provide for development, but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
EG2	<i>New employment space</i>	This policy supports Development proposals for new or intensified employment floorspace within designated employment locations / identified site allocations and at other locations where viability is demonstrated.	All Habitats Sites	<p>This policy provides the development principles for new employment floorspace within identified site allocations or designated employment locations.</p> <p>Any development within LBTH's administrative area that falls within the indicative 7.2km ZOI has the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites, and hydrological changes via water resource conflicts (Lee Valley SPA and Ramsar only).</p>	<p>Any increase in traffic due to development has the potential to result in LSE due to changes in air quality, both due to the LBTH Local Plan 'alone' and 'in-combination' with other plans and projects.</p> <p>Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes, and water resource conflicts may result in hydrological changes.</p>	Screened in
EG3	<i>Affordable workspace</i>	LBTH's Employment Land Review (2023) and Affordable Workspace Study (2023) identify a gap in the affordability of commercial space within the borough for many types of businesses. This policy supports the provision for affordable workspace within the borough.	All Habitats Sites	A development management policy relating to ensuring that new development of commercial space provides a proportion of affordable workspace.	No LSE therefore no in-combination effect.	Screened out
EG4	<i>Loss and redevelopment of employment space</i>	This policy describes the criteria that will be used to assess the potential loss of employment space within the borough in line with the vision and objectives of the plan. To ensure the supply of employment land to meet identified demand is maintained, proposals	All Habitats Sites	A development management policy relating to protecting the loss of employment space within the Borough.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		which result in the loss of employment floorspace in certain areas will not be supported.				
EG5	<i>Railway Arches</i>	This policy supports development proposals involving railway arches, subject to a set criteria, to preserve industrial spaces outside of the SIL and LSIS designations.	All Habitats Sites	A development management policy relating to development within railway arches.	No LSE therefore no in-combination effect.	Screened out
EG6	<i>Data centres</i>	This policy sets out requirements to support development of data centres in Local Industrial Locations and Local Mixed Employment Locations.	All Habitats Sites	A development management policy relating to location and form of data centres in local industrial locations and employment locations. It does not specify quantum of development.	No LSE therefore no in-combination effect.	Screened out
Town Centres						
TC1	<i>Supporting the network and hierarchy of centres</i>	This policy defines the network of centres across the borough and describes the role and function of each centre and how they will continue to serve the needs of the borough and the wider area.	All Habitats Sites	This policy sets out the principles of development within town centre locations. It does not identify any specific location or quantum of development. It can be considered that at the Local Plan level there are no effect pathways present	No LSE therefore no in-combination effect.	Screened out
TC2	<i>Protecting the diversity, vitality and viability of town centres</i>	This policy is in relation to development proposals which are expected to support the retail function of Primary and Secondary Shopping Frontages and the Redchurch Street and Columbia Road Specialist Centres, prioritising Class	All Habitats Sites	This policy seeks to protect the retail function of town centres. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		E(a) retail uses in these locations.				
TC3	<i>Town centre uses outside our town centres</i>	New retail development will be directed towards existing centres in accordance with the sequential approach set out in the NPPF which assesses the suitability of alternative sites in the following order of priority: town centres, edge-of-centre sites and other out-of-centre locations which are well connected to existing centres. However, this policy recognises that demand for retail also exists in locations outside of Metropolitan, District and Neighbourhood Centres to meet the immediate convenience needs of local people and/or support the function of designated employment locations.	All Habitats Sites	Isolated retail units, e.g. convenience stores, are unlikely to impact on Habitats sites and will largely be within already built up areas. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC4	<i>Markets</i>	This policy advises that development proposals must support the protection, retention and enhancement of existing markets.	All Habitats Sites	This policy seeks to protect existing markets within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC5	<i>Food and drink</i>	This policy recognises that food and drink businesses play an important role in town centres and therefore development proposals relating to food and drink establishments will be supported subject to a set criteria.	All Habitats Sites	This policy seeks to support food and drink establishments within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
TC6	<i>Entertainment uses</i>	This policy recognises that concentrations of betting shops, casinos and other gambling establishments present a high level of risk to those with gambling addictions or those susceptible to addiction and therefore development proposals will be subject to strict criteria.	All Habitats Sites	This is a policy to prevent too many betting offices within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC7	<i>Evening and night-time activities</i>	This policy recognises that evening and night-time food, drink, leisure and culture businesses and organisations are an important part of the Tower Hamlets economy and contribute to the vitality, vibrancy and sense of place of town centres and as such relevant proposals will be supported subject to set criteria.	All Habitats Sites	This policy seeks to support the evening and night time economy within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
TC8	<i>Short-stay accommodation</i>	This policy seeks to steer visitor accommodation towards the Central Activities Zone, Canary Wharf Metropolitan Centre, Tower Hamlets Activity Areas, and the borough's District Centres, or in other locations with very good public transport accessibility.	All Habitats Sites	This policy provides the principles for development for visitor accommodation e.g. hotels within town centre locations. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Community Infrastructure						
CI1	<i>Supporting community facilities</i>	This policy seeks to maintain an adequate supply and range of				

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		community facilities across the borough to serve local needs and support the creation of more liveable and sustainable places.				
C12	<i>Existing community facilities</i>	This policy seeks to protect and enhance the borough's existing community facilities where they are still needed to adequately meet local needs.	All Habitats Sites	A development management policy in relation to the availability of community facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
C13	<i>New and enhanced community facilities</i>	This policy seeks to ensure that appropriate high quality community facilities are provided in accessible locations throughout the borough, particularly via methods of active travel and public transport, to adequately support the growing population and meet identified needs.	All Habitats Sites	A development management policy in relation to the availability of community facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
C14	<i>Public houses</i>	This policy seeks to protect existing public houses within the borough with development proposals not supported for the loss of a public house unless strict criteria are met.	All Habitats Sites	A positive policy seeking to promote the use of active travel and public transport within the borough in relation to accessing community facilities which will therefore potentially divert pressure away from the Habitats Sites.	No LSE therefore no in-combination effect.	Screened out
C15	<i>Arts and Culture facilities</i>	This policy seeks to protect existing arts and cultural facilities. Development proposals which include the loss of an arts or cultural facility will not be supported unless subject to meeting strict criteria.	All Habitats Sites	A policy in relation to existing public houses. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
C12	<i>Arts and Culture facilities</i>	This policy seeks to protect existing arts and cultural facilities. Development proposals which include the loss of an arts or cultural facility will not be supported unless subject to meeting strict criteria.	All Habitats Sites	A development management policy in relation to the availability of arts and cultural facilities within the borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Biodiversity and open space						
BO1	<i>Green and blue infrastructure</i>	This policy seeks to protect and enhance the borough's valuable network of open spaces as well as promote the creation of new publicly accessible open spaces which are better connected and provide a wide range of opportunities for local communities and visitors in line with the Open Space Strategy, Green Grid Strategy and other relevant strategies.	All Habitats Sites	A positive policy providing for the protection and creation of Local Green and Blue infrastructure. This policy has the potential to divert recreational pressure away from sensitive Habitats sites.	No LSE therefore no in-combination effect.	Screened out
BO2	<i>Open spaces and the Green Grid network</i>	This policy aims to ensure that development proposals do not negatively impact the existing network of publicly accessible open space and contributes to its expansion and enhancement. It also seeks to maximise the opportunities for delivery of new open space and for enhancing accessibility and connectivity to the wider network, which is considered crucial to addressing the borough's open space deficiency	All Habitats Sites	This policy promotes the use and access to open spaces within the Borough which could therefore lead to increased recreational and pressures and therefore disturbance on nearby Habitats sites. The policy approach to look at this strategically could have potential to be beneficial as access can be managed, monitored and mitigated as necessary, depending on how the policy is implemented. This policy	By improving access to open spaces it has the potential to give rise to 'in-combination' effects with other plans and projects.	Screened in

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
				could result in LSE on nearby Habitats sites.		
BO3	<i>Water spaces</i>	This policy provides details of how the borough's water spaces will be protected and how the various functions they offer are maintained and enhanced.	All Habitats Sites	A positive policy providing for the protection of water spaces within the borough.	No LSE therefore no in-combination effect.	Screened out
BO4	<i>Biodiversity and access to nature</i>	This policy promotes the need for development proposals to protect and enhance biodiversity and contribute to nature recovery in the borough via a range of different means including: Protecting and retaining existing habitats and features of biodiversity value, delivering a biodiversity net gain, avoiding negative impacts on any designated European site and avoiding harm to biodiversity including within SINC sites and Local Nature Reserves.	All Habitats Sites	This is a positive policy that seeks to protect nature conservation sites including Habitats sites and embeds Biodiversity Net Gain within Planning Policy.	No LSE therefore no in-combination effect.	Screened out
BO5	<i>Urban greening</i>	LBTH will expect development proposals to maximise opportunities for urban greening. This includes the integration of high quality and species diverse landscaping, street trees, wildlife habitat, green roofs and walls, and Sustainable Drainage Systems.	All Habitats Sites	A positive policy that seeks the inclusion of urban greening measures. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
BO6	<i>Play and recreation spaces</i>	Development proposals must provide or help to ensure that people of all ages and abilities have access to a wide range of opportunities for sports, recreation and play.	All Habitats Sites	Whilst this policy seeks to increase opportunities for play and informal recreation, it is considered to be targeted towards facilities with the community and therefore unlikely to increase in recreational pressures on nearby Habitats Sites, particularly as these all fall outside of the Borough and therefore no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
BO7	<i>Food growing</i>	LBTH will seek to protect existing allotments and community gardens and maximise the provision of new food growing spaces to support sustainable food growing locally, and to enhance opportunities for leisure, social interaction, improved physical and mental health, and education	All Habitats Sites	A positive policy seeking to utilise land within the Borough for food growing and not development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
<i>Movement and Connectivity</i>						
MC1	<i>Sustainable travel</i>	<p>This policy promotes the development of a healthy, safe, and environmentally friendly transport system that is, inclusive, accessible, and affordable for all who live, work, study in, and visit the borough.</p> <p>This policy seeks to manage growth to ensure it does not increase traffic congestion and crowding on public transport due to trip generation from development proposals as well as through-trips.</p>	All Habitats Sites	This is a positive policy to drive significantly improved environmental conditions in the LBTH area, including air quality. This improvement in environmental quality is driven primarily by human health considerations, however, an overall reduction in car trips and improvement in air quality will likely have a positive impact on levels of atmospheric pollution at Habitats sites.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
MC2	<i>Active travel and healthy streets</i>	This policy requires development proposals to improve the quality and connectivity of walking, wheeling, and cycling routes in the area. Development proposals are required to demonstrate how they have applied the Healthy Streets Approach as set out in the London Plan (2021) as part of the transport assessment.	All Habitats Sites	This is a positive policy to drive significantly improved environmental conditions in the LBTH area, including air quality. This improvement in environmental quality is driven primarily by human health considerations, however, an improvement in air quality through reductions in NOx concentrations will have a positive impact on levels of atmospheric pollution at Habitats sites.	No LSE therefore no in-combination effect.	Screened out
MC3	<i>Impacts on the transport network</i>	This policy seeks to ensure that the impact that development proposals have (both individually and cumulatively) on the transport network is fully assessed at the project level, particularly issues of congestion, air quality, severance, safety, and accessibility for cyclists and pedestrians.	All Habitats Sites	This is a positive policy that promotes the use of public and active transport modes and detailed project-level assessments for departure from these. Such activities potentially can lead to air quality improvements through reduced reliance on private motor vehicles. Elements of the policy only relate to potential negative effect pathways in describing further assessment requirements and the policy does not promote or assess these at a plan level.	No LSE therefore no in-combination effect.	Screened out
MC4	<i>Parking and permit-free</i>	This policy seeks to ensure that parking is controlled and managed both on-street and off-street to facilitate sustainable travel patterns, address congestion, and ensure that car use in the borough does not significantly increase along with the expected growth in population.	All Habitats Sites	This is a positive policy that promotes the use of public and active transport modes. Such activities potentially can lead to air quality improvements through reduced reliance on private motor vehicles and vehicles emitting greenhouse gasses.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		Sets out an expectation that car-free should be the starting point for all development.				
MC5	<i>Sustainable delivery, servicing and construction</i>	This policy seeks to address the challenges the borough faces in ensuring the efficient, safe, timely and sustainable movement of goods and materials across the borough, while also seeking to improve air quality and reduce impacts arising from the freight networks. Requires new development to use zero emission vehicles for servicing.	All Habitats Sites	This is a positive policy that promotes the use of sustainable and active transport modes. Such activities potentially can lead to air quality improvements through reduced reliance on vehicles emitting greenhouse gasses.	No LSE therefore no in-combination effect.	Screened out
Reuse, Recycling and Waste						
RW1	<i>Managing our waste</i>	This policy seeks to develop a well-planned and integrated network of waste management facilities across the borough to address future capacity needs and contribute towards managing waste generated within the borough over the plan period.	All Habitats Sites	This is a positive policy as it aims to make waste collection more efficient across the Borough.	No LSE therefore no in-combination effect.	Screened out
RW2	<i>New and enhanced waste facilities</i>	This policy relates to new and enhanced waste management facilities (including those replacing, expanding, or intensifying existing sites as well as capacity on sites) and seeks to direct them towards the most	All Habitats Sites	This is a positive policy as it aims to make waste collection more efficient across the Borough.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI ³¹	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		appropriate and sustainable locations which do not have any unacceptable environmental and transport impacts. Requires infrastructure to facilitate transition of fleet to low and zero emission vehicles.				
RW3	<i>Waste collection facilities in new development</i>	This policy will help to ensure that waste is collected and managed in a sustainable manner. It is also intended to increase the amount of waste which can be recycled and composted from all developments, and to improve waste collection systems in developments with communal waste facilities.	All Habitats Sites	This is a positive policy as it aims to make recycling as easy as possible therefore resulting in higher recycling rates within the Borough.	No LSE therefore no in-combination effect.	Screened out

- 7.2.30 Most of the policies in the LBTH Local Plan can be concluded not to pose a risk of LSE following the screening exercise. These policies inherently present no pathway of effects and generally set out general development or planning protection principles, largely without specifying a quantum of growth or development schemes.
- 7.2.31 Three policies; HF1 – Meeting housing needs, EG2 – New employment space and BO2 – Open spaces and the Green Grid networks are screened in and as such require further consideration in this HRA at Stage 2 Appropriate Assessment. In the case of Policies HF1 and EG2 they have the potential for increased traffic (and therefore impacts on air quality), as well as the potential for increased demand on water resources (and therefore resulting in hydrological changes to Lee Valley SPA and Ramsar), and for all policies (HF1, EG2 and B02) they may result in increased recreational and development pressures and therefore disturbance on nearby Habitats sites.

8 Detailed Screening Discussion

8.1.1 The results of the Screened in LSE are outlined below. The discussion is presented by designated site and LSE.

8.2 Epping Forest SAC

Air Quality

8.2.1 This section considers the potential adverse effects on integrity of Epping Forest SAC from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.2.2 Detailed assessment is provided within the supporting *Air Quality Information Report to Support Habitats Regulations Assessment* (WSP, 2024).

8.2.3 For each of the site allocations, the proposed land use has been applied as set out in Table 5-3 'applicable/refined AQ Zol' column, which has been used to determine the average trip length/refined Zol (based on the average journey lengths provided within the Air Quality Neutral Guidance). These distances have then been applied both 'as the crow flies' and via road (which represents a more realistic scenario) to determine which site allocations lie within the refined ZOI, and therefore require further consideration, and those that lie outside of the refined ZOI and can be screened out.

8.2.4 As a result, the majority of site allocations can be screened out of further assessment because there is no identified receptor pathway. This is due to these site allocations sitting outside of the Zol (based on the proposed land uses) both 'as the crow flies' (and therefore via road, as this distance would inevitably be greater).

8.2.5 The following site allocations have been identified as being within the relevant refined Zol where there is a potential receptor pathway (adopting a precautionary approach using the highest average trip lengths for the different types of development proposed):

- 3.6 – Hackney Wick Station
- 3.7 – Hepscoth Road
- 3.8 – Sweetwater

These three allocations have therefore been taken forward for further assessment at Appropriate Assessment (and calculation of trip rates and assignment across the network, as appropriate).

8.2.6 It should be noted that the screening does not allow for windfall sites (unallocated or undesignated) which could deliver an estimated 2,500 homes over the Local Plan period. These have been automatically screened in, applying the precautionary principal. However, it is likely that a proportion of these would be located on previously development / brownfields sites outside of the identified Zol.

Conclusions

8.2.7 Likely Significant Effects cannot be ruled out for Epping Forest SAC as a result of air quality (air pollution) led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

Recreational pressure due to public access / disturbance

8.2.8 This section considers the potential adverse effects on integrity of Epping Forest SAC from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development in the Borough.

8.2.9 The basis of this assessment lies with the precautionary approach taken for maximum trip distance within an Inner London location of 7.2km for residents within the Borough and the propensity to use Habitats sites as a recreational resource given the geographical location of the allocated sites noted in the emerging Local Plan.

8.2.10 The closest Proposed Allocation to Epping Forest SAC is Sweetwater, Site ID 3.8 (4.9km north-west from Epping Forest SAC at its closest point by access). A further of 12 Allocations fall within the precautionary 7.2km Zol.

8.2.11 All other Proposed Allocations fall outside of this Zol and therefore increased recreational pressure on the SAC as a result of these allocations can be scoped out of further assessment and not considered further within this screening exercise.

8.2.12 The 7.2km average trip distance from allocations has been used as a precautionary figure to screen the likelihood of new residents visiting any individual Habitats site. When considering other distance criteria to use, a review of available visitor surveys and Habitats sites within and in proximity to London demonstrates that visitor pressure is most likely to arise from a smaller catchment area that the 7.2km applied at initial screening stage to ensure all potential Habitats sites are considered for inclusion within the assessment.

8.2.13 Visitor studies undertaken for Epping Forest have identified a 6.2km ‘zone of influence’ for the site, within which new housing development is assumed likely to have a significant effect in combination. This area forms the basis of the Epping Forest Strategic Access Management and Monitoring Strategy (SAMM) that is relied on by councils local to the SAC as mitigation for the potential effects of housing growth in their administrative areas.

8.2.14 Four allocation sites are present within this refined 6.2km zone assuming ‘as the crow flies’ straight-line distance only. These are:

- 3.6 - Hackney Wick Station
- 3.7 - Hepscott Road
- 3.8 - Sweetwater
- 3.4 - Bromley by Bow

8.2.15 These allocations have therefore been screened in for further consideration at Appropriate Assessment.

Assessment of potential effects

8.2.16 The SIP for Epping Forest SAC identifies that Epping Forest is subject to high recreational pressure with a high general level of footfall in Epping Forest throughout the year, including periods of significant use, and resulting in a diverse range of impacts which include mountain biking and unmanaged fires. It is anticipated that population and visitor numbers are likely to continue to increase. Increased recreational pressure as a result of additional housing and new employment space within the Borough as set out under Policy HF1 and EG2 of the Local Plan is considered to be a risk to this Habitats Site.

Conclusions

8.2.17 Likely Significant Effects cannot be ruled out for Epping Forest SAC as a result of increased recreational pressure led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

8.3 Lee Valley SPA and Ramsar

Air Quality

8.3.1 This section considers the potential adverse effects on integrity of Lee Valley SPA & Ramsar Site from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.3.2 The SIP for Lee Valley is the source of screening assessment set out in Table 7-2, as *Air Pollution: risk of atmospheric nitrogen deposition* is listed in that document as a ‘Threat’, but specifically only in association with the qualifying feature A021(NB) Bittern (*Botaurus stellaris*) and an associated action on Natural England to ‘Investigate the potential impacts of air pollution’.

8.3.3 Lee Valley SPA is a large and fragmented Habitats site, with distinct and separate component areas of waterbodies extending from Ware in the north, approximately 26km south to Clapton. In considering the unique underpinning SSSIs, not all of these sites are designated for Bittern and those locations close to the Local Plan ZOI (Walthamstow Reservoirs, Walthamstow Marshes SSSI) are not designated for the species. Bittern are predominately associated with components of the SPA and

Ramsar further north, notably Turnford & Cheshunt Pits SSSI, over 10km north of the SPA/Ramsar components which are the focus of this assessment in proximity to LBTH. It is therefore concluded that this aspect of the SIP is not targeted at the Habitats sites component parts within the identified Zol.

- 8.3.4 The SSSI Units underpinning the SPA and Ramsar sites for Lee Valley have all been recently assessed (2022) by Natural England to be Favourable. This applies to Units in proximity to the A503 (identified at Regulation 18 HRA Screening as the point of greatest consideration for air quality where it bisects the SPA and Ramsar) as well as Units more distant from the A503. SSSI Units outside the SPA/Ramsar but contiguous with it include those not in favourable condition, but this is clearly stated to be due to hydrological supporting processes and invasive non-native species. There is no indication of an existing adverse effect from the highway on the site condition, which could be considered to apply equally to any supporting habitat of the SPA and Ramsar.
- 8.3.5 On the basis of the points above of no detectable adverse effect associated with air quality on the SPA and Ramsar (via underpinning SSSI Units), and the absence of the qualifying feature for which triggers the SIP consideration of air quality as a threat within the overall Lee Valley SPA, it is considered that air quality can be discounted from further consideration of Likely Significant Effects on the Lee Valley SPA and Ramsar sites.

Recreational Pressure due to public access / disturbance

- 8.3.6 This section considers the potential adverse effects on integrity of Lee Valley SPA and Ramsar from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development in the Borough.
- 8.3.7 The basis of this assessment lies with the precautionary approach taken for maximum trip distance within an Inner London location of 7.2km for residents within the Borough and the propensity to use Habitats sites as a recreational resource given the geographical location of the allocated sites noted in the emerging Local Plan.
- 8.3.8 The closest Proposed Allocation is Hackney Wick Station, which is located 3.83km from the SPA / Ramsar with a total of 800 units allocated as part of this development site. A further 17 Proposed Allocations fall within the 7.2km Zol.
- 8.3.9 All other proposed allocations fall outside of this Zol and therefore increased recreational pressure on the SPA / Ramsar as a result of these allocations can be scoped out of further assessment and not considered further within this screening exercise.
- 8.3.10 The 7.2km average trip distance from allocations has been used as a precautionary figure to screen the likelihood of new residents visiting any individual Habitats site and ensuring all relevant Habitats sites were included

in the Screening stage. When considering other distance criteria to use, a review of available visitor surveys and Habitats sites within and in proximity to London demonstrates that visitor pressure is most likely to arise from a smaller catchment area than the 7.2km applied at this screening stage.

- 8.3.11 The results obtained from Epping Forest surveys of visitor pressure (Liley *et al*, 2018) identified a threshold of 6.2km where visitor numbers from outside this area dropped to 'very low'.
- 8.3.12 The results obtained from a similar survey at Burnham Beeches (Liley *et al*, 2018) under an identical methodology identified that visitor numbers dropped to a 'low' threshold from 5km from the Habitats sites.
- 8.3.13 Walthamstow Reservoirs Site of Scientific Interest (SSSI) comprises of 10 SSSI units which overlap with the SPA / Ramsar designation. A recent assessment of all SSSI units was carried out in March 2022³², which concluded that all 10 units were in favourable condition, with the following commentary provided:

'An assessment was carried out looking at bird data provided by the BTO and LWT. The assessment was based upon the guidelines for the selection of ornithological SSSI's and the monitoring specification for the site. All features are assessed across all units regardless of location. Condition is assessed across the whole site. The site remains an important stronghold for wintering birds including Cormorant, Tufted Duck and Shoveler. For Cormorant and Tufted Ducks numbers exceed the target for the site, for Shoveler numbers have declined in recent years however this is due to them being more widely dispersed across the South-east now and the decline is not as a result of recreational disturbance or a lack in suitable habitat at the site....All features are in a favourable condition.'

- 8.3.14 It should be noted that the HRA prepared for the London Plan (AECOM, 2019) stated that for Lee Valley SPA / Ramsar that *A single London Plan policy (Policy H1: Increasing Housing Supply) may result in increased urbanisation and demand for recreational greenspace, and has the potential to impact upon the SPA/Ramsar site'*. It further added that *'Future updates to the London Plan and any HRA work will need to take account of the results of planned long-term visitor monitoring of the site'*.

Assessment of potential effects

- 8.3.15 The SIP for Lee Valley SPA identifies that areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog

³² [Site feature condition \(naturalengland.org.uk\)](https://naturalengland.org.uk).

walking which have the potential to affect SPA and Ramsar populations directly or indirectly. The closest proposed allocation is Hackney Wick Station, 3.83km from the designated site. Increased recreational pressure as a result of additional housing and new employment space within the Borough as set out under Policy HF1 and EG2 of the Local Plan could be directed at the green spaces in the north-east of the Borough, notably Victoria Park and Hackney Marshes, which form a continuous corridor of green infrastructure north to these Habitats sites.

Conclusions

- 8.3.16 Likely Significant Effects cannot be ruled out for Lee Valley SPA and Ramsar as a result of increased recreational pressure led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

Hydrological Changes

- 8.3.17 This section considers the potential adverse effects on integrity of Lee Valley SPA and Ramsar from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development.
- 8.3.18 Development supported by the new LBTH Local Plan is likely to increase demand for water which could indirectly impact Lee Valley SPA and Ramsar as part of it forms the PWS system in London.
- 8.3.19 Potable water in the borough is supplied by Thames Water as part of its London Water Resource Zone (WRZ). The London WRZ is supplied primarily from surface water resources of the River Thames and River Lee (80%), either directly or via storage reservoirs, with the remainder comprising groundwater abstractions. The London WRZ is an integrated system and so direct and specific supply relationships cannot necessarily be made – i.e. it is rarely possible or appropriate to identify a particular ‘source’ for water supply to a specific area. Consequently, direct effects on specific European sites as a result of development within the borough cannot necessarily be identified or quantified.
- 8.3.20 The water resources planning process helps to ensure that growth in water demand does not affect European sites. The Water Industry Act 1991, as amended by the Water Act 2003 and Water Act 2014, requires that all water companies must publish a Water Resources Management Plan (WRMP) that sets out their strategy for managing water resources across their supply areas over the next 25 years and beyond. WRMPs use calculations of Deployable Output (DO) to establish supply/demand balances; this enables water companies to identify those WRZs with potential supply deficits over the planning period. The calculations account for any reductions in abstraction that are required to safeguard European sites and so the WRMP process (with other regulations) helps ensure (as far as is achievable) that future changes in demand will not affect any European sites.

- 8.3.21 Thames Water has accounted for the growth supported by the London Plan in forecasting for the 2019 WRMP and has predicted future deficits from the beginning of the new planning period due to the projected increase in population and the effects of climate change. Thames Water broadly plans to meet these deficits through demand-reduction, new resource exploitation and water transfers into the WRZs using new and existing infrastructure.
- 8.3.22 The 2019 WRMP has been subject to HRA, which has concluded that it will have no adverse effects on any European sites, including Lee Valley SPA/Ramsar and this has been updated by the Revised Draft WRMP 2024³³. The WRMPs provide the best estimate of future water resource demand, and therefore it is reasonable to assume that the growth set out in the Local Plan can be accommodated without significant effects on any European sites due to PWS abstractions. Furthermore, since the WRMPs explicitly account for the growth predicted by the London Plan, 'in combination' effects between the Local Plan and the WRMP are unlikely to occur.

Assessment of potential effects

- 8.3.23 Parts of the SPA and Ramsar (Walthamstow reservoirs) also form part of the PWS system in London and so it is unlikely that these designations would experience LSE as a result of competition for water resources with that required for public consumption. The WRMP HRA (and HRA of the Revised Draft) has demonstrated that there will be no LSE and/or no adverse effect on site integrity on this site as a result of the WRMP options. Local water-level management is critical to site integrity, although this is closely managed and the Local Plan will not affect the flooding / water management regime employed within the SPA / Ramsar.

Conclusions

- 8.3.24 Although areas of the SPA and Ramsar (Walthamstow reservoirs) form part of the PWS system, the WRMP HRA process has demonstrated that there will be no adverse effects on this site as a result of the WRMP options. This is inherently an in-combination effect pathway as the WRMP does not provide reliable sources to assess the contribution on the LBTH Local Plan 'alone'. As it is uncertain which elements of the WRMP rely on mitigation measures, this effect pathway remains screened-in for Appropriate Assessment.

³³ [Document library - Thames Water Resources Management Plan \(thames-wrmp.co.uk\)](https://thames-wrmp.co.uk)

8.4 In-combination assessment

- 8.4.1 The Habitats sites considered in this assessment alone sit within the geographical area surrounded by six Boroughs within Greater London: Newham, Greenwich, Lewisham, Southwark, City of London and Hackney. The London Plan developed by the Greater London Authority (GLA) also covers the LBTH Area.
- 8.4.2 For each of the Local Plans there are also reports to inform the HRA and these have been consulted where available in this in-combination assessment. The findings from this work are summarise below. Note that the preceding consideration of water resources is by necessity an in-combination assessment and is not reproduced here.
- 8.4.3 Newham Council: It is understood that a Local Plan Refresh is currently underway for Newham Council, however to support their 2018 Local Plan the HRA concluded that *'policies within the plan can be screened out and an Appropriate Assessment for the local plan is not necessary'*
- 8.4.4 Royal Borough of Greenwich: A new Local Plan is currently underway to replace their adopted Core Strategy, with consultation running from 11th July 2023 to 5th September 2023. However, there is no HRA evidence on the portal.
- 8.4.5 Lewisham Council: Consultation on the Regulation 19 Draft Local Plan was undertaken between 1st March and 25th April 2023. The supporting Habitat Regulations Assessment concluded that *'the Lewisham Local Plan will not result in a likely significant effect on any European designated sites either alone or in combination'*. (AECOM, 2022).
- 8.4.6 Southwark Council: The Southwark Plan was adopted on the 23rd February 2022. The supporting HRA stated: The policies introduced under the Southwark Plan 2022 have been shown to pose 'no significant effects, alone or in combination' when assessed against the provisions of Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). *This conclusion has been accepted by Natural England following formal consultation 31 It is not therefore not considered necessary to carry out Stage 2 (Appropriate Assessment) and Stage 3 (mitigation and alternative solutions) of the Habitats Regulations Appropriate Assessment.*
- 8.4.7 City of London: The City of London Corporation is currently consulting on the Draft City Plan 2040. The supporting HRA concluded that: *'Since no likely significant effects on European sites have been identified, no recommendations for changes to the Proposed Submission Draft City Plan or for further HRA work have been made'* (LUC, 2021).
- 8.4.8 Hackney Council: The new local plan was adopted in July 2020. There is is no HRA supporting evidence on the portal.
- 8.4.9 The London Plan (Greater London Authority) also covering LBTH and the above listed London Boroughs stated: *"it was concluded that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be*

delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects.

- 8.4.10 No HRA documentation is available for Royal Borough of Greenwich Council and therefore it is unknown if LSE exist as a result of their Local Plans. As such, taken together, in-combination LSE cannot be ruled on Habitats sites as a result of policies in the emerging Local Plan when considered with other strategic plans.

Conclusion

- 8.4.11 For the impact pathways identified at HRA Stage 1 Screening, other Local Plan policies in proximity to LBTH have concluded lower risks to Habitats sites, generally no LSE, but the approaches and conclusions are not universally consistent, based on geographical locations and when the Local Plan and associated assessments were undertaken. A precautionary approach has therefore been taken to Screening and Appropriate Assessment of the LBTH Local Plan based on specific consideration of individual allocations, the existing pressures, threats and pathways associated with the Habitats sites within the ZoI, and the most robust available information to support infrastructure planning underpinning any growth within the Borough.
- 8.4.12 No specific additional impact pathways have been identified as part of the in-combination assessment (noting that any mitigation required as part of water resource planning has already been identified in that Screening assessment element).

9 Stage 2 Appropriate Assessment

- 9.1.1 The following LBTH Policies were screened-in at HRA Stage 1 Screening:
- HF1 – Meeting housing needs,
 - EG2 – New employment space and
 - BO2 – Open spaces and the Green Grid networks
- 9.1.2 The impact pathways forming a basis of this screening were identified as follows:
- In the case of Policies HF1 and EG2 they have the potential for increased traffic (and therefore impacts on air quality), on Epping Forest SAC;
 - Policies HF1 and EG2 were also screened-in for the potential for increased demand on water resources (and therefore resulting in hydrological changes) to Lee Valley SPA and Ramsar; and,
 - Policies HF1, EG2 and B02 were screened-in due to potential increased recreational pressures and therefore disturbance on Epping Forest SAC and Lee Valley SPA and Ramsar..
- 9.1.3 This was further refined through HRA Stage 1 Screening discussion to exclude a number of site allocations and support a site-specific approach to Stage 2 Appropriate Assessment.
- 9.1.4 For the air quality impact pathway, allocations under HF1 and EG2 were screened-in as follows:
- 3.6 – Hackney Wick Station
 - 3.7 – Hepscoth Road
 - 3.8 – Sweetwater
- 9.1.5 For the recreational impact pathway, allocations under HF1 and EG2 were screened-in as follows:
- 3.6 - Hackney Wick Station
 - 3.7 - Hepscoth Road
 - 3.8 - Sweetwater
 - 3.4 - Bromley by Bow

BO2 – Open spaces and the Green Grid networks

- 9.1.6 Following HRA Stage 1 Screening, it has been clarified that no delivery under this policy will extend to networks outside the Borough (and therefore any new or additional connection to habitats sites). In conjunction with the Appropriate Assessment set out for recreational impact pathways, it is not considered that this Policy has potential at a Plan level within the Borough to result in an adverse effect

on the integrity of Habitats sites. Should individual projects come forwards which do not conform to this assumption, it will be necessary to undertake a project-level HRA to ensure that any adverse effects can be avoided, or as necessary, mitigated.

Water Resources Impact Pathway

- 9.1.7 HRA Stage 1 Screening comprised an inherently in-combination assessment on the potential impact pathway of water resource use and LBTH Local Plan Policies HF1 and EG2 relating to site allocations. The main source of information in informing this assessment is the Thames Water WRMP information (2019 as adopted, 2024 updated draft), which is not something that can be effectively replicated at a Borough scale due to the large geographical nature of water resources.
- 9.1.8 It is noted that water-dependent habitats sites, specifically Lee Valley SPA and Ramsar, are specifically assessed throughout the supporting HRA information for the WRMP under a number of potential strategic measures. All of the assessment outcomes for these WRMP component projects conclude either no LSE, or no adverse effect on site integrity, once mitigation is applied.
- 9.1.9 As this conclusion on water resources has been reached for certain WRMP component projects after the application of mitigation, this impact pathway has been included within this Appropriate Assessment for the LBTH Local Plan as a potential contributor to the need for these infrastructure projects and therefore an in-combination impact pathway may be present.
- 9.1.10 Providing the mitigation measures identified with the WRMP assessments are implemented, the LBTH Local Plan HRA has concluded that this impact pathway will not result in an adverse effect on site integrity of Lee Valley SPA (and Ramsar designation) and this impact pathway will not be considered further in this HRA.

Epping Forest SAC

Epping Forest – Recreation

- 9.1.11 Following detailed consideration of access routes and clarification over Policy BO2 that new recreational access routes will not be created to improve links to Epping Forest SAC, a refined consideration of access routes within the 6.2km potential Zol has been applied.
- 9.1.12 LBTH is separated from Epping Forest SAC by extensive urban development in the Leyton area, with very limited public rights of way or desirable access routes. This contrasts with the existing extensive open green space provided closer to and within the Borough at Victoria Park and Hackney Marshes. In considering how residents access suitable green space, it is not considered likely that residents would travel past these accessible areas, as improved under Policy BO2, to contribute to pressures at Epping Forest. Access points to Epping Forest SAC via these green routes is possible, but involves journeys significantly in excess of the indicated 6.2km trip length.

9.1.13 Based on the Epping Forest Visitor Survey (Footprint Ecology, 2017), the following points are considered relevant in reaching this conclusion:

- *99% of interviewees had come for a short visit directly from home (i.e. as opposed to being on holiday or staying away from home in the area);*
- *Dog walking was the commonest activity (49% of interviewees), with other activities including walking (22%), outing with the family (9%), cycling/mountain biking (8%) and jogging/running/power walking (5%);*
- *Visits were typically relatively short, either 30 minutes to an hour (33% of interviewees) or 1-2 hours (43%);*
- *More than three-quarters (77%) of those interviewed had arrived by car. A further 14% had arrived on foot and 5% by bicycle.*
- *... the survey point with the most people entering or passing was, by some considerable margin, Connaught Water (13.2km from LBTH boundary).*
- *Besides other locations within Epping Forest (cited by 16% of interviewees), the most commonly named alternatives were the Lee Valley, Wansted, Chingford, the Roding Valley and Walthamstow Marshes/wetlands.*

9.1.14 The visitor survey conclusions indicate that any residents of LBTH are unlikely to bypass the much closer alternative green spaces of the Lee Valley and associated/linked parks and green spaces (as improved under Local Plan policies), to preferentially travel to Epping Forest (including by car) at a considerably greater distance, when the majority reasons for such visits are associated with routine activities for short durations.

9.1.15 Due to a lack of access connectivity, an adverse effect on site integrity on Epping Forest SAC from the Local Plan as a result of recreational pressure is not anticipated.

Epping Forest – Air Quality

9.1.16 Following the screened-in impact pathway for air quality effects, further consideration has been given to the specific allocations identified to take account of existing Plan-level HRA outcomes and the details of the allocations themselves.

9.1.17 The locations of the proposed site allocations were considered relative to Epping Forest SAC. Three site allocations were shortlisted due to an identified receptor pathway. These were: Hackney Wick Station, Hepscott Road, and Sweetwater.

9.1.18 All three of these sites are located within the administrative boundary of the LLDC and as such have already been subject to HRA. The LLDC Local Plan HRA concluded that there would be no LSE on Epping Forest SAC providing the following mitigation is implemented:

“Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where: ... An air quality assessment shows

that a proposed development would result in significant effects on habitats within European Sites.”

9.1.19 None of the extant planning applications for the three shortlisted site allocations have been supported by project level HRA to date. Where air quality assessments have been undertaken for the already consented schemes, these determined that effects would be not significant and in most cases below traffic data screening criterion (for human health). In general, parking was limited to blue badge holders only.

9.1.20 Notwithstanding the above, traffic data calculations were undertaken for these three sites to determine the ‘worst case’ number of trips that could travel on roads within the vicinity of Epping Forest SAC (both within London Borough of Waltham Forest and Epping Forest District Council’s administrative areas). These figures were then compared to JNCC’s decision-making thresholds to determine whether potential effects could be screened out as ‘de-minimis’ or whether further assessment was required to consider effects due to LBTH’s Local Plan, both ‘alone’ and ‘in-combination’.

9.1.21 It was noted that:

- The shortlisted sites have an existing land-use that was unable to be taken into account during the traffic data calculations. They are therefore likely to be a significant overestimation of the net change in traffic due to the emerging Local Plan.
- These represent total change within LBWF and EFDC and not the specific change on roads that lie within 200m of Epping Forest SAC.
- These assume that all cars will have tailpipe emissions (i.e. they have internal combustion engines) which is very worst case / unrealistic as the percentage of EVs is predicted to increase, especially given the policy context, the expansion of the Ultra Low Emission Zone, and measures with Tower Hamlets Transport Strategy regarding EV charging provision.

9.1.22 The subsequent qualitative assessment included evidence and trend data relevant to trip length, trip destination, travel demand, modal shift, car ownership, cycling and transition to a zero-emission vehicles. This qualitative evidence supports:

- LBTH’s has the lowest level of car-ownership among all London boroughs.
- Many trips are short in length and internal to the borough.
- That the LBTH’s emerging Local Plan is likely to make a negligible contribution to in-combination effects at Epping Forest SAC.
- An increase in active travel modes, particularly cycling.
- The borough is well placed / has characteristics to enable significant growth in cycling.
- LBTH has a very strong and accessible public transport network with further improvements proposed.
- The wider climate change agenda will also support in facilitating modal shift.

- 9.1.23 LBTH's Transport Strategy has not been quantitatively assessed but contains a series of short-term and long-term actions that will be taken to support the overall objectives of the Local Plan and help to support growth within the Borough. Whilst the Transport Strategy focuses on the delivery of measures that encourage more trips by foot, bike or public transport, it is recognised that some people will only be able to travel using private vehicles for some of their journeys. Therefore, it also contains a suite of measures for supporting Tower Hamlets' transition to a zero-emission fleet including the provision of charging infrastructure for EVs.
- 9.1.24 When taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold. This is consistent with the findings of LBWF's Local Plan HRA which concluded that trips through Epping Forest SAC would be 'de-minimis' when considering the net change in trips resulting from their Local Plan (e.g. due to replacing existing development with largely car free development).
- 9.1.25 With reference to the LLDC Local Plan HRA conclusion that "*Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where: ... An air quality assessment shows that a proposed development would result in significant effects on habitats within European Sites.*" the findings of this Appropriate Assessment broadly support this conclusion, however would not seek to rely on Project level HRA as a specific mitigation measure. The conclusion of this Appropriate Assessment for the impact pathway of air quality on Epping Forest SAC is that an adverse effect of site integrity is not likely to occur when considered at a Plan level.
- 9.1.26 A Project-level HRA should be required where the assumptions set out in this assessment are deviated from.

Lee Valley SPA and Ramsar

Lee Valley – Recreation

- 9.1.27 LSE could not be ruled out for Lee Valley SPA and Ramsar as a result of increased recreational pressure led by Local Plan policies within the Borough at the HRA Stage 1 Screening Stage, as site allocations under Policies HF1 and EG2 could lead to additional residents (and potentially recreational users) within a proximity where such access could not be discounted. The closest allocation was identified as Hackney Wick Station, 3.83km for the Lee Valley Habitats Sites. Further consideration was therefore recommended at Appropriate Assessment.
- 9.1.28 In considering whether it is likely that residents of LBTH will access the location of the Habitats sites within the Lee Valley, it was noted in responses to the Epping Forest Visitor Surveys (Footprint Ecology, 2017) that the considerable majority of users of that site were accessing from local areas for routine and short-duration activities, notably dog walking and general walking. Those visitors also named Lee

Valley and Walthamstow Wetlands as suitable alternatives they would choose to visit for those purposes. It is therefore reasonable to conclude that the Lee Valley, the associated linked parks and green spaces, and the Habitats sites associated with the Lee Valley, would be attractive to new residents within a suitable range for the purposes of recreation and general access.

- 9.1.29 Consideration was therefore applied to the areas of the Lee Valley designated SPA and Ramsar, which are wholly within the Walthamstow Wetlands fully operational 160 hectare Thames Water reservoir site, managed by the London Wildlife Trust (LWT). The Habitats sites are therefore controlled in two specific and highly monitored and managed aspects: firstly, the safety and security consideration associated with reservoirs managed for public water supply by Thames Water, and secondly the active management and control of the site by the Wildlife Trust including published rules prohibiting access outside designated public areas, controlled site access hours, site ranger supervision and seasonal closures of specific areas of the sites.
- 9.1.30 The above measures are based on the geographical location of Walthamstow Wetlands within an existing highly urbanised area, where uncontrolled and unmanaged access would have previously led to significant adverse impacts on the qualifying features of the SPA and Ramsar sites. As the management approach does not therefore rely on specific numbers of nearby residents, but by strict segregation of recreational or incompatible uses of the site and Conservation Objectives without reliance on immediately adjacent functionally linked land, the presence of allocations within a Zol where residents or occupants may choose to access the location of the designations is not considered to give rise to an adverse effect on site integrity, providing effective management of all recreational/disturbance continues.
- 9.1.31 A conclusion of no adverse effect on site integrity as a result of recreational and disturbance pressure on the Lee Valley SPA and Ramsar sites as a result of the LBTH Local plan can therefore be reached, including the consideration of this (in place and functioning) mitigation.

10 Conclusions

- 10.1.1 This document provides guidance on the likely data sources, information requirements and the process of HRA Screening and Appropriate Assessment. It also provides a discussion of where the ecological implications of the LBTH Local Plan have been considered and which Habitats sites are vulnerable to known pressures, threats and existing impacts.
- 10.1.2 There are no Habitats sites within LBTH's administrative area, however there are three Habitats sites that fall within the identified precautionary 7.2km Zol of the Borough boundary (Epping Forest SAC; Lee Valley SPA and Ramsar site) and as such impact pathways for these Habitats sites from the policies of the Local Plan have been carefully considered.
- 10.1.3 A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but three policies were screened-in (HF1 – Meeting Housing Needs, EG2 – New Employment Space and BO2 Open Spaces and the Greed Grid networks) for their further consideration at Stage 2 Appropriate Assessment. These policies were identified to have potential for Likely Significant Effects on nearby Habitats sites relating to increased or re-distributed traffic (and therefore impacts on air quality), water resource implications, and increased public access, recreational and disturbance pressures.
- 10.1.4 At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to specific allocations under Policies HF1 and EG2, including in-combination effects considered with other strategic plans.
- 10.1.5 Policy BO2 was subject to further consultation with the Plan-making body (LBTH) and subsequently concluded based on the geographical limitations of that Policy that an impact pathway would not reasonably be present to result in adverse effects upon the integrity of the Habitats sites .
- 10.1.6 Following the Appropriate Assessment, site-specific consideration for site allocations and air quality under Policies EG2 and HF1 resulted in a conclusion when taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies) and measures within Tower Hamlets' Transport Strategy, the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold. This is consistent with the findings of LBWF's Local Plan HRA which concluded that trips through Epping Forest SAC would be 'de-minimis' when considering the net change in trips resulting from their Local Plan (e.g. due to replacing existing development with largely car free development).
- 10.1.7 Air quality considerations at Appropriate Assessment for Lee Valley SPA and Ramsar concluded that there was no evidence of an adverse effect on qualifying features via this impact pathway, but also that the qualifying feature (Bittern) for

which air quality is indicated as a possible pressure or threat is not anticipated to be present within the components of the SPA/Ramsar within the Zone of Influence of LBTH.

- 10.1.8 Water resources pressures on Lee Valley SPA and Ramsar were considered to not result in an adverse effect on site integrity as a result of the LBTH Local Plan, considered through the outcomes of the in-combination growth as presented in the Thames Water adopted (2019) and Draft (2024) Water Resources Management Plan. It is acknowledged that under some scenarios and strategic projects, this conclusion is supported by the use of mitigation measures.
- 10.1.9 Recreational disturbance pressure was considered for both Epping Forest and for Lee Valley SPA and Ramsar at Appropriate Assessment. For Epping Forest, a conclusion of no adverse effect on site integrity has been reached due to a lack of pathways between LBTH (as opposed to ‘as the crow flies’ distances), the reasons for visits to Epping Forest as derived from published visitor surveys, and the presence of more extensive and equally attractive green spaces closer to LBTH for those activities.
- 10.1.10 Recreational disturbance effects on Lee Valley SPA and Ramsar have been assessed as resulting in no adverse effect on site integrity due to the site elements within the Zone of Influence of LBTH (a component of the overall SPA and Ramsar in the Lee Valley) being wholly within the managed environment of Walthamstow Wetlands and Thames Water reservoirs complex, with controlled and managed access. This mitigation for existing significant recreational and disturbance pressure is considered to be in place, effective and functioning in a manner that is not dependent on Local Plan allocations and overall resident numbers.
- 10.1.11 The conclusion of this Habitats Regulations Assessment is that the majority of Local Plan Policies have no impact pathway relevant to the Habitats sites within proximity of LBTH and no Likely Significant Effect is expected.
- 10.1.12 For three Policies associated with site allocations and access to green space, further consideration has been necessary at Appropriate Assessment, resulting in a conclusion of no adverse effects on site integrity being identified. In two instances this has included consideration of mitigation, but these measures are already in place and functioning, or proposed to address in-combination effects as part of strategic infrastructure delivery, not reliant on specific actions undertaken by LBTH.
- 10.1.13 Should separate Plans of projects come forwards which deviate from the assumptions set out here in this Plan-level HRA, a Project -level HRA should be undertaken to confirm that the conclusions set out here remain accurate and address any additional avoidance or mitigation measures, as necessary.

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Figures

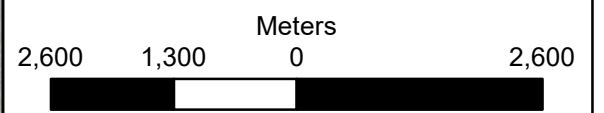
Figure 1 – Habitats Sites within a 7.2km Zol of LBTH allocated sites

Figure 2 – Allocated Sites within Epping Forest SAC buffer zones and Air Quality Zol



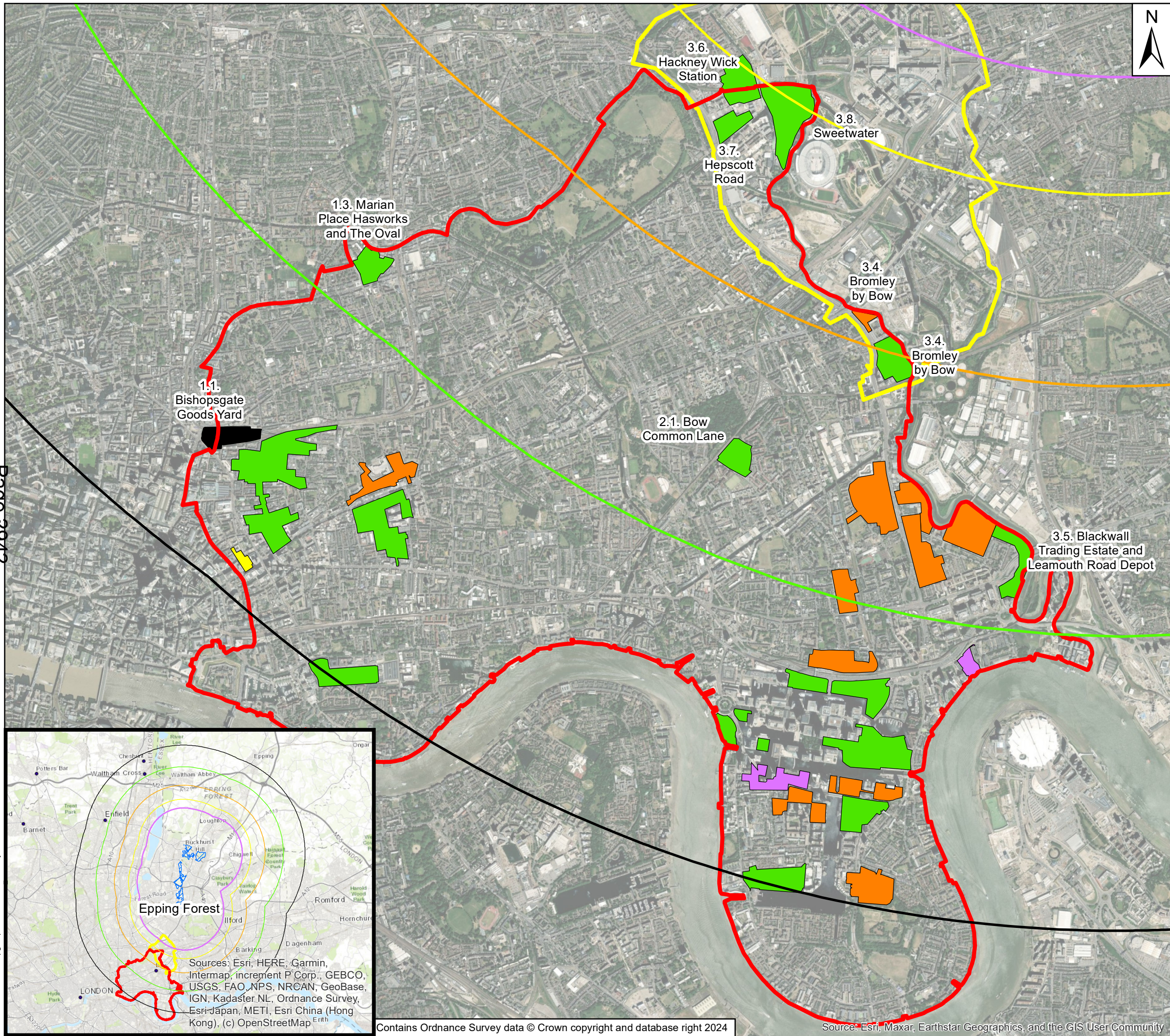
Key

-  London Borough of Tower Hamlets (LBTH)
-  London Legacy Development Corporation (LLDC)
-  7.2km Zone of Influence (Zoi)
-  Special Area of Conservation
-  Special Protection Area
-  Ramsar Site - Wetland of International Importance
-  Allocated Sites



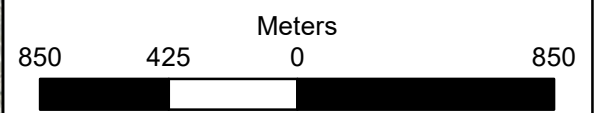
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Project:	London Borough of Tower Hamlets New Local Plan
Title:	Habitat Sites within a 7.2km Zoi of LBTH allocated sites

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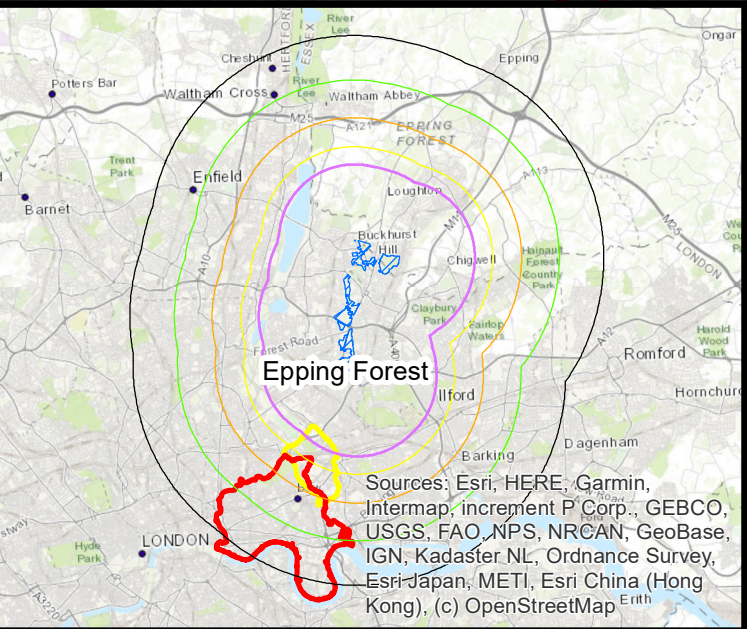


Key

- London Borough of Tower Hamlets (LBTH)
- London Legacy Development Corporation (LDCC)
- Special Area of Conservation
- Air Quality Zol Buffers of SAC**
- 3.4km of SAC
- 4.2km of SAC
- 5.5km of SAC
- 7.2km of SAC
- 9.2km of SAC
- Allocated Sites-Air Quality Zol Buffers**
- 3.4 km
- 4.2 km
- 5.5 km
- 7.2 km
- 9.2 km

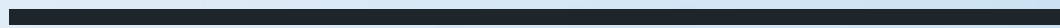


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Project:	London Borough of Tower Hamlets New Local Plan		
Title:	Allocated Sites within Epping Forest SAC buffer zones and Air Quality Zol		
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Appendix A

CJEU Rulings



The Council for Justice of the European Union (CJEU) rulings

A number of CJEU rulings are relevant to the HRA screening exercise and are noted below. At the present time the position, under section 6(3) EU (Withdrawal) Act 2018 (as amended), is that the courts in the UK, with the sole exception of the Supreme Court, will continue to be bound by HRA judgments handed down by the CJEU and by domestic courts prior to 31 December 2020 when interpreting the Conservation of Habitats and Species Regulations 2017 (as amended). This is the case as long as the Conservation of Habitats and Species Regulations 2017 (as amended) remain unmodified by Parliament. The Supreme Court will, however, be at liberty to depart from these judgments after 31 December 2020 if they consider it appropriate to do so.³⁴

The Wealden Judgement

The Wealden Judgement³⁵, handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.

Prior to this Judgement, air quality impacts on Habitats sites were only considered alongside roads where the traffic growth associated with the individual Plan or Project being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07³⁶), which has been subsequently withdrawn namely:

- increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).

The Wealden Judgement found that the application of the criteria to the traffic growth associated with a single Local Plan was unsound on the basis that two Local Plans collectively contributing more than 1000 AADT could lead to a potentially significant effect. The Judge determined that further assessment of air quality impacts on Habitats sites

³⁴ Freeths Habitats Regulations update 2020. Available at: <https://communications.freeths.co.uk/44/1637/october-2020/the-habitats-regulations-assessment-regime-after-31-december-2020---how-will-it-look-.asp?sid=8bf6fad5-597a-43c6-8f70-61503ec0adb9>

³⁵ Judgment in Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.

³⁶ *Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07)*. Withdrawn, but available online: <https://standardsforhighways.co.uk/dmrb/archive/search/df0c77ed-887b-4c84-be0e-000fe18545ae>

should have been carried out and quashed part of the Local Plan that would have led to an in-combination exceedance of 1,000 AADT.

The Wealden Judgement means that every single plan or project which, alone, is predicted to give rise to any increase in traffic or other air emission (however small) must be subjected to an in-combination assessment with other plans or projects (which would include those plans or projects with a similar tiny impact). However, the judgement did not rule out the application of thresholds in principal and this approach is normally taken as the basis of the assessment.

The judgement has led to a more detailed analysis of three key questions to discern which plans and project are those where a detailed “in combination” assessment is required in relation to changes in air quality:

1. Is your plan or project putting emissions into the air?;
2. If so, are those emissions at a level where they could actually be measured / perceived?; and
3. If so, is there a realistic (rather than hypothetical) risk that those emissions, alone, will have an adverse effect on the ecology of a SAC / SPA?

A fuller justification will be required when applying the threshold approach.

People over Wind (The Sweetman Case)

The Court of Justice of the European Union’s (CJEU’s) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17)³⁷ (hereafter referred to as the ‘Sweetman Case’), states that:

‘Article 6(3) must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.’

In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the

³⁷ Judgement of the Court 12 April 2018, People Over Wind, Peter Sweetman, Coillte Teoranta Available online: <https://curia.europa.eu/juris/document/document.jsf?jsessionid=B02FE6F4F1C61308615DBBDF079EE5F4?text=&docid=200970&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=11190634>

Habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.

This is an emerging issue for local authorities and means that, because of the potential for 'in-combination effects and the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats sites. Therefore, it is becoming increasingly commonplace for local authorities to conduct an Appropriate Assessment of all project, plans and planning applications (i.e. these are often no longer screened out, by way of an HRA Screening as has been the practise to date).

CJEU Ruling in the Netherlands nitrogen and agriculture cases c-293/17 and c-294/17

The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality. Notably, the Court of Justice of the European Union ruled that:

- An 'Appropriate Assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.
- National measures such as procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying with Article 6(2).

Of particular relevance to the assessment of air quality effects on Habitats sites, the Court of Justice of the European Union ruled that:

"An 'Appropriate Assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.

The Ruling makes clear that certainty and a thorough and in-depth examination of the scientific soundness is required that that there is no reasonable scientific doubt as to the absence of adverse effects of each plan or project on the integrity of the site concerned.

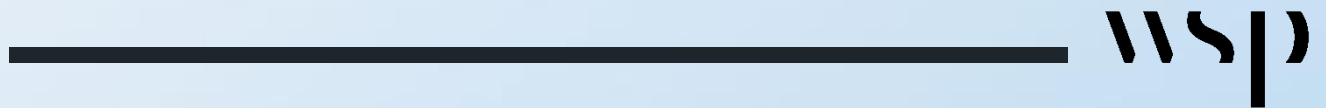
Kokott Ruling

In the Opinion of Advocate General Kokott in Case C-6/04 Commission v UK [2005] ECR I-9017 at paragraph 49 she noted that an assessment of plans cannot by definition take into account all effects because

“Many details are regularly not settled until the time of the final permission” and “[i]t would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure”.

Appendix B

Habitats Sites Details, Including Qualifying Features and Conservation Objectives



Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
Epping Forest SAC	1630.7	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ 9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>) <p>Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i>. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.</p> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> ▪ 4030 European dry heaths <p>Annex II species that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ 1083 Stag beetle <i>Lucanus cervus</i> <p>Epping Forest is a large woodland area in which records of stag beetle are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a</p>	<ul style="list-style-type: none"> ▪ J02 – Human induced changes in hydraulic conditions ▪ A04 – Grazing ▪ G01 – Outdoor sports and leisure activities, recreational activities ▪ H04 – Air pollution, air-borne pollutants ▪ M02 – Changes in biotic conditions³⁸ 	<ul style="list-style-type: none"> ▪ P – Air Pollution: impact of atmospheric nitrogen deposition ▪ P - Undergrazing ▪ P - Public Access/Disturbance ▪ T – Changes in species distributions ▪ T – Inappropriate water levels ▪ T – Water Pollution ▪ T – Invasive species ▪ T – Disease ▪ P/T – Invasive species³⁹ 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.⁴⁰

³⁸ Epping Forest SAC Natura 2000 form. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012720.pdf>

³⁹ Epping Forest Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5732004727881728>

⁴⁰ Epping Forest SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/file/5442443424301056>

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.			
Lee Valley SPA	451.3	<p>ARTICLE 4.1 QUALIFICATION (79/409/EEC) Over winter the area regularly supports:</p> <ul style="list-style-type: none"> Bittern <i>Botaurus stellaris</i> (Europe - breeding) 6% of the GB population Five year peak mean for 1992/93 to 1996/97 <p>ARTICLE 4.2 QUALIFICATION (79/409/EEC) Over winter the area regularly supports:</p> <ul style="list-style-type: none"> Northern shoveler <i>Anas clypeata</i> (North-western/Central Europe) 1% of the population 5 year peak mean, 1993/4-1997/8 Gadwall <i>Anas strepera</i> (North-western Europe) 1.5% of the population 5 year peak mean, 1993/4-1997/8 	<ul style="list-style-type: none"> J02 – Human induced changes in hydraulic conditions H02 – Pollution to groundwater (point sources and diffuse sources) G01 – Outdoor sports and leisure activities, recreational activities K02 – Biocenotic evolution, succession F01 – Marine and Freshwater Aquaculture⁴¹ 	<ul style="list-style-type: none"> T – Water Pollution T – Hydrological changes T – Public Access/Disturbance T – Inappropriate scrub control T – Fisheries: Fish stocking T – Invasive species T – Inappropriate cutting/mowing T – Air Pollution: risk of atmospheric nitrogen deposition⁴² 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> The extent and distribution of the habitats of the qualifying features The structure and function of the habitats of the qualifying features The supporting processes on which the habitats of the qualifying features rely The population of each of the qualifying features, and, The distribution of the qualifying features within the site.⁴³
Lee Valley Ramsar	447.9	<p>Ramsar criterion 2 - supports vulnerable, endangered, or critically endangered species or threatened ecological communities.</p> <p>Nationally important species occurring on the site: Whorled water milfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a waterboatman).</p> <p>Ramsar criterion 6 – species occurring at levels of international importance (as identified at designation).</p> <p>Over winter the site regularly supports:</p>	<ul style="list-style-type: none"> Vegetation succession Water diversion for irrigation/domestic/industrial use Eutrophication Persistent drought Introduction/invasion of exotic plant species Recreational/tourism disturbance (unspecified) General disturbance from human activities 		

⁴¹ Lee Valley SPA Natura 2000 form. Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012111.pdf>

⁴² Lee Valley Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/file/5788502547496960>

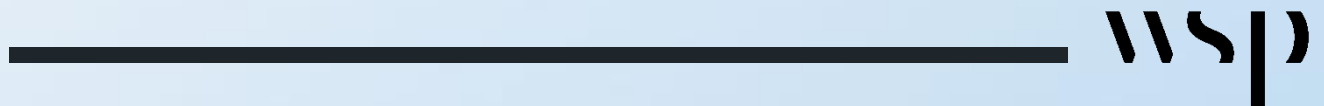
⁴³ Lee Valley SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/file/6516586265706496>

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		<ul style="list-style-type: none"> ▪ Gadwall <i>Anas strepera</i> (North-western Europe). 456 individuals, representing an average of 1.5% of the population (Five-year peak mean for 1993/94 to 1997/98) ▪ Northern shoveler <i>Anas clypeata</i> (North-western/Central Europe). 406 individuals, representing an average of 1% of the population (Five-year peak mean for 1993/94 to 1997/98). 	<ul style="list-style-type: none"> ▪ Unspecified development: urban use⁴⁴ 		

⁴⁴ Lee Valley Ramsar Information Sheet. Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1037RIS.pdf>

Appendix C

APIS Information for SPA and SAC Sites within 7.2km of the Allocated Sites (2023 data)



Site	Species	Relevant Critical Load			N Deposition kg N/ha/yr			Ammonia Critical Level $\mu\text{g NH}_3/\text{m}^3$ annual mean	NH ₃ Concentration $\mu\text{g}/\text{m}^3$		
		Relevant Habitat	Relevant CL Habitat	CL Range	Maximum	Minimum	Average		Maximum	Minimum	Average
Lee Valley SPA & Ramsar	<i>Anas clypeata</i> (North-western/Central Europe)	N/A	No comparable habitat with established critical load estimate available	N/A	18.6	14.4	15.9	3	2.2	1.5	1.7
	<i>Anas strepera</i> (North-western Europe)	N/A	No comparable habitat with established critical load estimate available	N/A	18.6	14.4	15.9	3	2.2	1.5	1.7
	<i>Botaurus stellaris</i> (Europe - breeding)	Rich fens	Rich fens	15 - 25	18.6	14.4	15.9	3	2.2	1.5	1.7
Epping Forest SAC	<i>Erica tetralix</i>	Northern Atlantic wet heaths	Northern wet heath	5 - 15	17.9	15.3	16.8	1	2.0	1.4	1.6
	European dry heaths	European dry heaths	Dry heaths	5 - 15	17.9	15.3	16.8	1	2.0	1.4	1.6
	Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robur-petraeae or Ilici-Fagenion)	Atlantic acidophilous beech forests	Fagus forest on non-acid and acid soils	10 - 15	32.2	27.0	29.7	1 or 3	2.0	1.4	1.6
	<i>Lucanus cervus</i>	Broadleaved deciduous woodland	Broadleaved deciduous woodland	10 - 15	32.2	27.0	29.7	3	2.0	1.4	1.6
	<i>Triturus cristatus</i>	No comparable habitat with established critical load estimate available	No comparable habitat with established critical load estimate available	N/A	18.1	11.2	13.5	3	2.0	1.4	1.6

Appendix D

Annual Mean NOX Concentrations

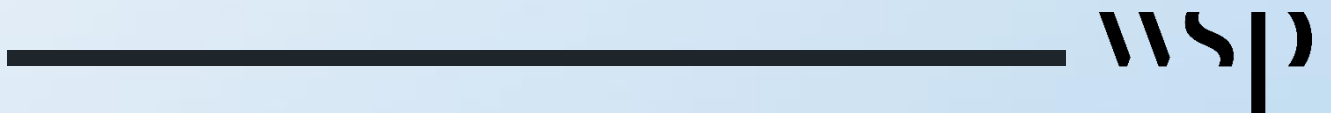


Table D-1 – Estimated 2023 annual mean background NO_x concentrations for the area encompassing Lee Valley SPA and Ramsar

X	Y	Total 2023 background NO _x concentration (µg/m ³)**
534500	187500	29.4
534500	188500	27.2
533500	188500	27.0
534500	189500	30.6
535500	189500	28.3
535500	190500	27.7
536500	201500	18.0
537500	201500	16.3
536500	202500	17.2
537500	202500	14.8
536500	203500	16.1
537500	203500	14.0
536500	204500	16.8
537500	204500	13.6
538500	209500	17.1
539500	209500	14.1
538500	210500	15.3
539500	210500	16.4
537500	212500	13.1
538500	212500	12.7
537500	213500	11.9

*Exceedances of the Critical Level are shown in **bold**.

**Data taken from Defra's webpages

Table D-2 – Estimated 2023 annual mean background NO_x concentration for the area encompassing Epping Forest SAC

X	Y	Total 2023 background NO _x concentration (µg/m ³)**
538500	188500	31.5
539500	188500	29.4
538500	189500	29.2
539500	189500	28.3
538500	190500	33.6
539500	190500	35.7
538500	191500	27.4
539500	191500	27.1
539500	192500	23.8
540500	192500	24.6
541500	192500	24.7
539500	193500	22.6
540500	193500	23.1
541500	193500	22.7
537500	194500	22.9
538500	194500	22.8
539500	194500	21.3
540500	194500	20.9
541500	194500	21.1
537500	195500	21.7
538500	195500	19.3
539500	195500	19.9
540500	195500	20.1

X	Y	Total 2023 background NO _x concentration (µg/m ³)**
541500	195500	19.5
537500	196500	21.3
538500	196500	19.7
539500	196500	18.5
540500	196500	18.3
541500	196500	17.6
542500	196500	20.4
540500	197500	17.6
541500	197500	16.5
542500	197500	17.0
540500	198500	17.7
541500	198500	17.2
542500	198500	16.1
543500	198500	15.5
544500	198500	15.5
540500	199500	25.3
541500	199500	19.8
542500	199500	17.7
543500	199500	15.2
544500	199500	15.0
542500	200500	22.4
543500	200500	21.6
544500	200500	17.6
544500	201500	19.9

*Exceedances of the Critical Level are shown in **bold**. **Data taken from Defra's webpages



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New Local Plan – Regulation 22 Consultation Statement

A summary report of the public consultation on the new Local Plan

April 2024



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1 Introduction

1.0 The London Borough of Tower Hamlets is in the process of developing a new Local Plan to positively plan and manage future development until 2038. This statement summarises the stages of public consultation undertaken in line with the applicable Town and Country Planning (Local Planning) (England) Regulations 2012 (TCPA Regulations) as follows:

- Stage 1: (Regulation 18) Tower Hamlets Draft Local New Plan 2038.

1.1 To satisfy Regulation 22(C) of the TCPA Regulations, LBTH has prepared this statement which sets out:

- Which bodies and persons were invited to make representations under regulations 18 and 20;
- How these bodies and persons were invited to make representations under regulations 18 and 20;
- A summary of the main issues raised by the representations; and
- How the representations have been taken into account.

1.2 Activities undertaken for each consultation stage have been completed in accordance with the following legislation and guidance:

- The Town and Country Planning (Local Planning) (England) Regulations 2012 (TCPA Regulations) which defines the consultation procedures local planning authorities must follow when preparing a Local Plan.
- The Localism Act 2011 which sets out the legal duty to cooperate between local planning authorities and other public bodies to maximise the effectiveness of policies covering strategic matters in Local Plans.
- Paragraph 13 of the National Planning Policy Framework which expects local plans to provide ‘a platform for local people to share their surroundings.’
- The Tower Hamlets Statement of Community Involvement (Adopted 2019) which specifies the principles of community involvement in Tower Hamlets. With regard to Local Plan preparation, this statement explains when and how we will consult with the community and who we will involve in this process.

1.3 The preparation of the Local Plan has been through the following rounds of consultation in live with the TCPA Regulations:

Stage	Regulation	Title	Nature of the Stage	Period
Stage 0	Non-statutory	Early Engagement	Scoping and data gathering – views were sought on what issues the plan should address.	25 January 2023 to 8 March 2023
Stage 1	Regulation 18	Tower Hamlets Draft New Local Plan	Plan Preparation – views were sought on the draft vision, objectives and detailed wording of the policies including the council’s preferred list of site allocations.	6 November 2023 to 18 December 2023

- 1.4 The 'specific consultation bodies LBTH has consulted (as stipulated in the Regulations) are listed in Appendix 1. 'The general consultation' bodies that LBTH has consulted are listed in Appendix 2. These lists are considered largely to be a definitive list of all bodies consulted, not accounting for updates to the consultation database (i.e. requests for amendments/deletion of details) following each consultation stage. In addition to these general consultation bodies, a number of individual consultees was also consulted at each stage.
- 1.5 LBTH published a consultation summary report on the 'Early Engagement' consultation alongside the Regulation 18 consultation documents. This report details the consultation activities undertaken, a summary of responses and the main issues raised by respondents for each policy topic and the site allocations. This report includes a brief summary of the 'Early Engagement' consultation but does not include details of issues raised.

Statement of Community Involvement

- 1.6 LBTH's Statement of Community Involvement (SCI) sets out how the community can be involved in the preparation of local planning policy documents and decisions on planning applications. Each stage of consultation on the proposed local plan was carried out following the approach set out in the SCI. LBTH is currently carrying out a review of the SCI in line with statutory requirements [officers are checking process requirements and legislation].

2 Duty to Cooperate

2.1 The duty to cooperate was introduced in the Localism Act 2011. It places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

2.2 LBTH has held meetings with planning officers from neighbouring planning authorities and the Greater London Authority and will continue to do so through the remainder of the plan process to discuss cross-boundary issues in line with the duty to cooperate.

2.3 For the purposes of the duty to cooperate the prescribed bodies are:

- 2.3.1 Environment Agency
- 2.3.2 Sport England
- 2.3.3 Historic England
- 2.3.4 Natural England
- 2.3.5 Mayor of London
- 2.3.6 Civil Aviation Authority
- 2.3.7 Department of Levelling Up, Housing and Communities
- 2.3.8 NHS Tower Hamlets
- 2.3.9 Network Rail
- 2.3.10 Office of Rail and Road
- 2.3.11 Transport for London
- 2.3.12 Highways Agency
- 2.3.13 Utility Providers
- 2.3.14 Marine Management Organisation.

3 Early Engagement

3.1 Prior to the start of drafting the new local plan, the council undertook early engagement to determine the direction of travel on a number of matters. This was a non-statutory consultation event, from Wednesday 25 January 2023 until Wednesday 8 March 2023.

3.2 It consisted of:

- Digital engagement materials:
 - Details on the Tower Hamlets website
 - Let's Talk Tower Hamlets consultation page
 - ArcGIS StoryMap platform
 - PDF engagement document
 - Google Forms survey
 - Word document version of survey
 - Social media
- Emails to mailing list and stakeholders, including residents, consultees, and councillors
- Divisional session
- Public events:
 - 3 online webinars
 - 2 online drop-in sessions
 - 2 in-person drop-in sessions
 - In-person public engagement session
- Flyers and posters at Idea Stores and libraries; flyers handed out on streets.

4 Stage 1 of Plan Preparation (Regulation 18)

Introduction

4.1 Regulation 18 of Part 6 of the Town and Country Planning (Local Planning) Regulations 2012 states that (1) a local planning authority must –

Notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the planning authority propose to prepare, and

Invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are-

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

4.2 Following Early Engagement, a draft Local Plan was produced based on the feedback received. In order to satisfy the requirements of Regulation 18 of the TCPA Regulations, a consultation was undertaken on the draft plan. This consultation sought views on the draft vision and objectives for how the borough will grow and develop in the future, detailed wording of policies and the council's preferred list of site allocations. This consultation period ran from 6 November 2023 to 18 December 2023.

4.3 This consultation exercise, plus other ongoing engagement with stakeholders, meets the requirements of Regulation 18 of the TCPA Regulations.

Consultation Methods

4.4 Regulation 18 Consultation took place between 6th November and 18th December 2023 and represents the first stage of statutory consultation as part of the local plan review process.

- Digital engagement materials:
 - Details on the Tower Hamlets website
 - Let's Talk Tower Hamlets consultation page
 - ArcGIS StoryMap platform
 - Accessible PDF of the full draft Plan
 - PDF Summary documents for each policy theme
 - Summary documents translated into Bengali and Somali
 - Google Forms survey
 - Word document version of survey
 - Social media

- Emails to mailing list and stakeholders, including residents, consultees, and councillors
- Public events:
 - 6 In-person engagement events (3 at local libraries/community centres)
 - 6 online webinars
 - 3 online drop-in sessions
 - 3 in-person drop-in sessions
- Flyers and posters at Idea Stores and libraries; flyers handed out on streets.

Digital engagement materials

4.5 A range of digital engagement materials were used to support early engagement on the development of a new Local Plan.

Let's Talk webpage

4.6 The Let's Talk page was used as the main engagement webpage, with all relevant details including links to other digital engagement material and how to get involved, including online and in-person engagement events. This page also includes a project timeline, frequently asked questions, an option to subscribe to emails, and contact details for the Plan-Making team.

ArcGIS StoryMap

4.7 An ArcGIS StoryMap is an interactive platform and visual tool used to showcase the early stages of developing a new Local Plan. The platform provides a summary of the challenges, opportunities and key policy themes. The StoryMap contains visuals including interactive and static maps, images, and diagrams. Each policy theme section also includes a survey with questions to capture views across the broad range of themes.

4.8 The purpose of the StoryMap is to provide an engaging and easy-to-navigate platform containing concise information for each theme.

Main website

4.9 A page was added to the council's main Planning Policy webpage providing details on the local plan review and a link to the Let's Talk page.

Accessible PDF Draft Local Plan

4.10 An accessible PDF document was published that includes the full draft local plan. This document was made available on the Let's Talk page.

PDF summary documents

4.11 Accessible PDF summary documents were produced covering each of the policy themes and the site allocations. These documents were made available on the Let's Talk page and printed versions were distributed at the public engagement events.

Translated Documents

- 4.12 The PDF summary documents covering each of the policy themes were translated into Bengali and an overall summary document covering the role of the local plan and the process of reviewing it was translated into Bengali and Somali. These translated documents were published on the Let's Talk page and distributed in printed form at the public engagement events.

Surveys

- 4.13 The surveys were produced using Google Forms and contain the questions presented on the StoryMap platform and in the PDF, with a short introduction to each theme and any relevant maps. A word document version was also available. These can be found on the Let's Talk webpage.

Social media

- 4.14 Social media posts directing people to the Let's Talk page were posted at various times and days throughout the consultation period on LinkedIn, Twitter, Facebook and Nextdoor. Paid social media adverts were also used across Facebook, Instagram and Twitter, to further promote the early engagement event to a wider audience.

Emails

- 4.15 Emails were sent to all people and bodies on the consultation mailing list. These include statutory consultees, local councillors and any person or body that has previously requested details of planning policy consultations. An initial email was sent that included an explanation of the role of the new local plan, the purpose of the Reg 18 consultation, a list of public engagement events, a link to the Let's Talk page, and contact information for the planning policy team. Additional emails were sent weekly throughout the consultation period including a list of the public events coming up that week.
- 4.16 In addition to the general mailing list, bespoke emails were also sent to organisations representing communities that were underrepresented in the early engagement. This includes organisations representing disabled residents, young people, ethnic minority women and the Somali community. These emails provided an overview of the role and function of the plan, and invited these groups to attend bespoke sessions with officers.

Physical Media

Flyers, Physical Documents, Idea Stores and Libraries

- 4.17 Physical flyers were produced with a short summary of the role of the local plan and the address for the Let's Talk page, as well as a QR code leading to the Let's Talk page. Officers distributed these flyers to members of the public in locations with high footfall. They were also distributed to community organisations and public-facing council teams to distribute more widely.

4.18 Hard copies of consultation documents, including the full draft local plan, were made available at the Town Hall, Whitechapel Idea Store, Watney Market Idea Store, Bow Idea Store, Poplar Idea Store, Canary Wharf Idea Store, Bethnal Green library, Cubitt Town library and the Local History library.

Press and Media Coverage

4.19 Press notices were placed in local newspapers in accordance with statutory requirements. In addition, several ‘advertorials’ were placed in local newspapers that serve the Bangladeshi community. The table below summarises this coverage:

Newspaper/Organisation	Details
Docklands & East London Advertiser	Public consultation notice published 9 November 2023
London Gazette	Public consultation notice published 6 November 2023
Our East End	Advertorial published December 2023
One Bangla News	Advertorial published November 2023
POTRIKA	Advertorial published November 2023
Runner Media	Advertorial published November 2023
Weekly Desh	Advertorial published November 2023

4.20 In addition to publication in local newspapers, the consultation was promoted in the council’s newsletter to residents, both virtual and physical.

Public events

4.21 A series of public events was held including workshops covering different policy topics and specific areas of the borough. All events were carried out first in person and then repeated online. In addition, drop-in sessions were held, both in person and online, in which individuals or small groups could ask questions and provide feedback one on one with officers. The table below provides a summary of the consultation events:

Date	Time	Venue	Topic
13 November 2023	18.00-20.00	Town Hall	Housing and People, Places and Spaces
14 November 2023	12.00-14.00	Online	Housing and People, Places and Spaces
14 November 2023	18.00-20.00	Town Hall	Inclusive Economy, Town Centres and Community Infrastructure
15 November 2023	12.00-13.30	Online	Drop-in
16 November 2023	12.00-13.30	Town Hall	Drop-in
20 November 2023	12.00-14.00	Online	Inclusive Economy, Town Centres and Community Infrastructure

22 November 2023	12.00-13.30	Town Hall	Drop-in
22 November 2023	18.00-20.00	Town Hall	Clean and Green Future, Biodiversity, Transport, Waste
27 November 2023	18.00-20.00	Online	Health and the Local Plan
28 November 2023	12.00-14.00	Online	Clean and Green Future, Biodiversity, Transport, Waste
28 November 2023	18.00-20.00	Brady Centre	City Fringe area
30 November 2023	12.00-13.30	Online	Drop-in
4 December 2023	18.00-20.00	Canary Wharf Idea Store	Isle of Dogs area
5 December 2023	12.00-14.00	Online	City Fringe area
7 December 2023	12.00-13.30	Town Hall	Drop-in
12 December 2023	12.00-14.00	Online	Isle of Dogs area
12 December 2023	18.00-20.00	Poplar Idea Store	Central and Leaside area
13 December 2023	12.00-14.00	Online	Central and Leaside area
14 December 2023	12.00-13.30	Online	Drop-in

Consultation Responses Summary

4.22 Overview

Let's Talk website:

- 10,400 site visits in the 6 week period
- 1,500 visitors engaged with the published documents
- 2,153 downloads of the Local Plan document itself (by 991 different people).

Online Survey:

- 245 responses, mostly borough residents
- Another 20 responses to Site Allocation Qs

Written responses

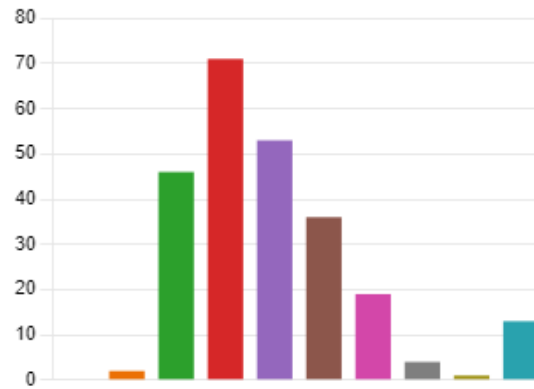
- 136 written responses received from statutory consultees, developers, landowners and community groups

4.23 The graphs below provide demographic information regarding respondents to the online survey:

165. Age

[More Details](#)

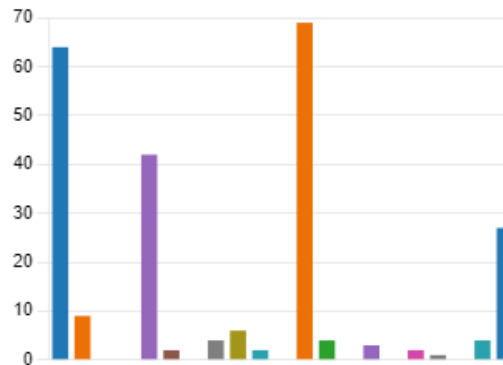
0-15	0
16-24	2
25-34	46
35-44	71
45-54	53
55-64	36
65-74	19
75-84	4
85+	1
Prefer not to say	13



168. How would you describe your ethnic group?

[More Details](#)

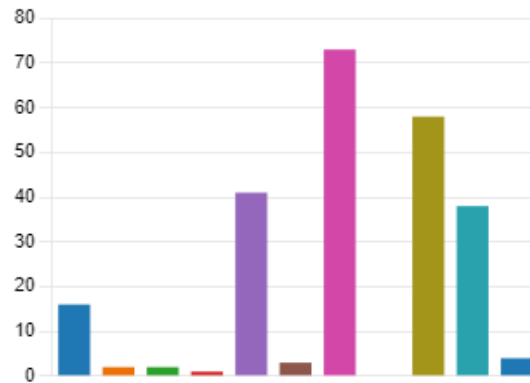
White: British	64
White: Irish	9
White: Traveller of Irish heritage	0
White: Gypsy/Roma	0
Any other White background	42
Mixed: White and Black Caribbe...	2
Mixed: White and Black African	0
Mixed: White and Asian	4
Mixed: Any other mixed backgr...	6
Asian / Asian British: Indian	2
Asian / Asian British: Pakistani	0
Asian / Asian British: Bangladeshi	69
Chinese	4
Vietnamese	0
Any other Asian background	3
Black / Black British: Somali	0
Black / Black British: Other Africa	2
Black / Black British: Caribbean	1
Black / Black British: Any other B...	0
Any other background	4
Prefer not to say	27



169. What is your religion or belief?

[More Details](#)

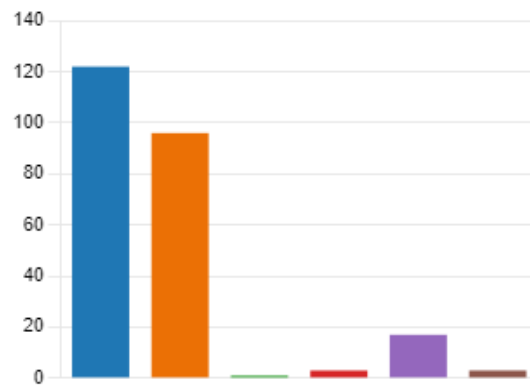
● Agnostic	16
● Buddhist	2
● Hindu	2
● Humanist	1
● Christian	41
● Jewish	3
● Muslim	73
● Sikh	0
● No religion or belief	58
● Prefer not to say	38
● Other	4



167. Which best describes your gender?

[More Details](#)

● Male	122
● Female	96
● Trans-gender	1
● Non-binary	3
● Prefer not to say	17
● Other	3



4.24 Summary of Consultation Responses by Policy

Delivering the Local Plan		
Policy	Summary of Comments	How we responded
DV1 Areas of growth and opportunity within Tower Hamlets	<p>Policy should also consider that small sites can help to aid delivery of development.</p> <p>Recommended to consider potential of development near planned public transport improvements.</p> <p>Concern was expressed that resisting piecemeal development could frustrate delivery.</p> <p>Policy should expand the uses for railway arches.</p> <p>Concern as to scale and definition of infrastructure contributions required for new development.</p>	<p>Reference to London Plan Policy H2 Small sites now included.</p> <p>Text amended to consider development opportunities near planning public transport.</p> <p>Assertion not accepted as piecemeal development is not in line with design led requirements which is a national and regional requirement.</p> <p>See comments on EG5 Railway arches</p> <p>Regulation 18 policy and IDP set out in detail what are the infrastructure requirements sought to facilitate increased development.</p>
DV2 Delivering sustainable growth in Tower Hamlets	<p>Policy should include reference to London Plan policy D9 Tall Buildings</p> <p>Strengthen policy by enabling zero carbon transport and freight.</p>	<p>Reference included.</p> <p>Minor text change to include reference to sustainable freight.</p>
DV3 Healthy communities	<p>There are cross cutting policy links between healthy communities and design policies. Policy should seek to support improved outcomes for those with disabilities.</p> <p>Quality of life can be impacted upon by high rise development.</p>	<p>Text amended to include reference to inclusivity, ability and gender.</p> <p>The potential impacts of high rise development have been considered un People, Places and Spaces.</p>

	<p>Include greater emphasis on the need for physical activity.</p> <p>Suggested to cover a number of additional themes in HIA such as food growing, SUDs, affordable housing and safe and high-quality green space.</p> <p>Concerns that HIA requirement is onerous and will there be sufficient resources to support their guidance and assessment.</p>	<p>Text amended to include further reference to physical activity and active modes of travel.</p> <p>These issues are addressed in specific policies in the wider Local Plan.</p> <p>Resourcing is in place to support the development and assessment of HIA's.</p>
<p>DV4 Planning and construction of new development</p>	<p>A number of submissions asserted that the Code of Construction Practice should remain as guidance and not a requirement of planning consent.</p> <p>A number of respondents requested clarification as to how financial contributions towards funding development coordination would be secured.</p> <p>A number of respondents expressed concerns if this were secured through a section 106 creating an onerous process.</p> <p>Requirement to consider the cumulative impact of development with 1km is onerous.</p> <p>Consideration of cumulative impacts should also cover natural environment.</p> <p>Query regarding construction forum through LLDC transition.</p>	<p>The Code of Construction Practice is supported by numerous Local and Regional policies and will remain a requirement of the Regulation 19 Local Plan.</p> <p>Clarification added to text to set out how contributions are to be secured.</p> <p>The coordination of development is necessary to ensure delivery impacts can be mitigated. The need for this service results from development impacts.</p> <p>Text amended to refer to vicinity to make requirement less onerous.</p> <p>This is addressed in Construction Code of Practice Chapter 13.</p> <p>Issues of post LLDC transition responsibilities are currently being assessed by LBTH.</p>

	A need for resourcing to ensure construction management plans are reviewed and approved in a timely manner.	Dedicated resources within the Delivery Coordination Team are in place.
DV5 Developer contributions	<p>Developer contributions should be proportionate and justify.</p> <p>Reference to affordable housing requirements should be removed as this is not always necessary.</p> <p>Request to expand Section 106 agreements to secure infrastructure funding such as health facilities.</p> <p>A number of respondents have referred to the need to support Vacant Building Credit in the revised plan and not doing so would not be in conformity with National Planning Policy.</p> <p>Concern that the evidence base on viability is out of date.</p> <p>Communities should determine how CIL is spend.</p> <p>Minor errata such as paragraph numbers.</p> <p>Concerns expressed that some areas are developed more than others and do not receive the infrastructure they need.</p>	<p>Infrastructure needs and requirements for developer contributions are set out in the Infrastructure Delivery Plan and the Developer Obligations SDP.</p> <p>Policy states “where necessary or appropriate” therefore no change required.</p> <p>Health facilities are strategic infrastructure so it is not justified to obtain contributions to these via S106. These will be secured through CIL.</p> <p>Viability evidence base is currently being updated to consider if a change is required.</p> <p>We have conducted a new viability assessment that has tested all the policies of the Local Plan and found them viable.</p> <p>There are mechanisms to disburse CIL outside the Local Plan.</p> <p>Edits made to text to correct errata.</p> <p>CIL funding and reporting sets out how funding is spent in areas which need infrastructure to accommodate new development.</p>

<p>DV6 Social value</p>	<p>Social value statements should be project and site specific.</p> <p>More social value partnerships working with larger businesses and local people. Young people want to see development deliver more accessible pathways to higher skilled employment.</p> <p>Concerns that it is difficult to disaggregate between social value obligations and other planning obligations.</p> <p>Evidence base refers to Optimising Site Capacity: A Design Led Approach LPG and it is unclear how this informs social value.</p> <p>Query as to whether social value has been considered on scheme viability.</p> <p>Policy should recognise the social value of in life science schemes.</p> <p>Policy should consider physical and mental health.</p> <p>Prioritises 'community engagement activities to measure happiness and well-being of occupiers.'</p> <p>Focused on outcomes and what actually gets delivered. Concerned it is just 'wishy-washy' 'green-washing' that won't mean anything in the long term.</p>	<p>Text already included these specific requirements.</p> <p>The council current operates apprenticeship programmes with businesses located within the Borough. Further detail on what should be considered in social value statements would be better set out in Council produced guidance to allow this emerging field to be agile.</p> <p>It is intended to produce social value guidance which will inform what is considered an obligation and help to guide to assist applicants in the production of their social value statements.</p> <p>Evidence base has been updated to Good Growth Principles in the Local Plan.</p> <p>Policy has been tested by the viability assessed.</p> <p>Not appropriate for this policy to go into scheme specifics.</p> <p>These concerns are covered in policy DV3.</p> <p>These concerns are covered in policy DV3.</p> <p>The intention of this policy is to provide meaningful additionality to the delivery of social value benefits through the development process. Through effective</p>
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	<p>Policies should place a key emphasis on tackling climate change, affordable housing and affordable business rates.</p> <p>A general concern among the public that what is promised through development doesn't materialise and that there is doubt about tangible outcomes.</p>	<p>implementation it should create positive outcomes and not just become a tick-box exercise.</p> <p>It is good to have a sense of the key elements that the local community value most and it is considered these have been addressed in the relevant policies.</p> <p>Text has been amended to secure social value interventions through section 106 agreements.</p>
DV7 Utilities and digital connectivity	<p>Responses to consultation set out they had experienced utility or digital connectivity shortages as a result of development in TH. Biggest issues were lack of full fibre wifi, poor 5G infrastructure and concern with water capacity/pressure on loD.</p> <p>A number of respondents objected to the requirement to provide a utility statement considering it both onerous and outwith their responsibilities.</p> <p>Current drafting would require any development of 10 or more units to produced a utility statement.</p> <p>Support for decarbonisation of heat networks.</p>	<p>Utilities statements are to support early planning and to support developers and utility companies ahead of time to coordinate delivery of utilities capacity, maximise efficient routing, and reduce the impacts of connection installations. Aggregated information from utility statements will allow early conversations with utility and service providers that inform their capacity and route planning, supporting on-time delivery and coordination and reduce disruption, which could not be achieved through applications by individual developers.</p> <p>Early engagement with the Council's planning service can determine the scope of utility statements to reduce the burden placed on the development industry. Support welcomed.</p>
DV8 Site allocations	<p>It is asserted that as no one site is the same a standardised approach to allocations is not appropriate.</p>	<p>Whilst each site is different, there are principles that apply to all the site allocations, including the threshold</p>

	<p>Seeking infrastructure as early as possible and set commitments to minimum open space sizes. These are details which would be better set out on a site-by-site basis within the allocations themselves, having consideration to site circumstances and development programme.</p> <p>Amend the policy to allow for phased delivery of infrastructure, as we have seen on development some infrastructure works in early delivery but some are not viable and can lead to issues around occupation and management of spaces. The location as well as phase of the scheme will also be relevant to where infrastructure can be delivered.</p> <p>Planning balance is necessary to support development and provide flexibility for changing market conditions.</p> <p>Policy should be amended to consider viability.</p> <p>Policy should consider opportunities for sustainable transport.</p>	<p>capacity of at least 500 homes, and including the requirements set out in policy DV8.</p> <p>It is considered that these principles apply to all the site allocations in the Local Plan, and therefore they are best placed in policy DV8 which applies to development across all sites.</p> <p>The policy clearly refers to phases of development, not suggesting that all infrastructure must come forward before housing delivery; and clearly says ‘as far as possible, allowing for flexibility in circumstances such as those discussed. The supporting text further supports this approach, and does not need to be incorporated into the policy wording itself, as suggested by comment 58 below. An additional instance of ‘where possible’ has been added to the supporting text.</p> <p>Planning balance is the consideration of the implementation of planning policy, not the policies themselves.</p> <p>The Local Plan Viability assessment has tested all policies and has found them to be viable.</p> <p>Reference to sustainable transport improvements added to the supporting text</p>
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Homes for the Community		
Policy	Summary of Comments	How we responded
HF1 Meeting housing needs		
HF2 Affordable housing and housing mix	General conformity concern raised relating to London Plan policy H5 Threshold approach to allocations.	Text has been amended to ensure there are no conformity issues.
HF3 Protection of existing housing		
HF4 Supported and specialist housing and housing for older people	General support for the principles and criteria set out in the policy.	
HF5 Gypsy and Traveller accommodation	The emerging GLA London wide Gypsy and Traveller Accommodation Need Assessment may indicate need for additional pitches.	The emerging GLA London wide Gypsy and Traveller Accommodation Need Assessment is yet to be finalised or published. In the absence of this policy can only be informed on current available evidence. This aside an assessment of possible future sites suitable for Gypsy and Traveller Accommodation has been undertaken.
HF6 Purpose-built student accommodation		
HF7 Large-scale purpose-built shared living	Respondents assert that the affordable housing requirements for large-scale purpose-built shared living are onerous and not in line with the London Plan.	A robust viability assessment has been undertaken which sets out that the affordable housing requirements are justified.
HF8 Housing with shared facilities	No submissions	
HF9 Housing standards and quality	<p>A number of respondents asserted the requirement that 10% of units be accessible is onerous.</p> <p>Through engagement with disability advocacy groups it was understood that while part M ensures accessibility</p>	<p>The requirement is in line with part M of the building regulations and is also part of the adopted plan. No change required.</p> <p>Increased requirements for wider accessibility such as automated doors.</p>

	<p>of units and includes lifts movement between parts of buildings can be challenging.</p> <p>A number of respondents stated that only accepting play space at ground floor level is impractical for high density developments with limited sites areas.</p> <p>If communal amenity space is being redeveloped as part of estate regeneration community input should be sought.</p>	<p>Text amended to promote ground floor play space in the first instance and where not practical set out criteria for supervision and proximity of play spaces to residential units.</p> <p>Text has been added recommending that existing communities be engaged in the design of redeveloped communal amenity space.</p>
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Clean and Green Future		
Policy	Summary of Comments	How we responded
CG1 Mitigating and adapting to climate change	<p>A respondent suggested that there should be a clearer link between CG1 and how this will support residents financially.</p> <p>Recommendation that this policy should reference the Thames Estuary 2100 Plan, and have greater regard to the impact of climate change on the health of habitats and biodiversity.</p>	<p>The supporting text has been updated to provide greater clarity as to how more energy efficient buildings will support lower energy costs to residents.</p> <p>The supporting text has been updated to include reference to the impacts of climate change on the natural environment, and reference the objectives of the TE2100 Plan.</p>
CG2 Low energy buildings	<p>Several respondents recommended that greater flexibility be built into the emerging sustainability policies to ensure development is viable.</p> <p>Respondents requested that policy text clarify how absolute energy metrics should be applied to minor and existing buildings.</p>	<p>All policies have undergone viability testing to ensure they will not negatively impact the deliverability of new development going forward.</p>
CG3 Low carbon energy and heating	<p>Several respondents requested that this policy refer to district heating networks.</p> <p>Some respondents noted that not supporting CHP and biomass is inconsistent with the GLA's Energy Assessment Guidance (June 2022)</p>	<p>Greater reference has been made to district heating networks and the heating hierarchy,</p> <p>Policy wording has been amended to be consistent with GLA guidance.</p>
CG4 Embodied carbon, retrofit and the circular economy	<p>Respondents requested that the wording of Part 3 be revised so that developments are required to demonstrate that a range of options from refurbishment to redevelopment have been fully assessed.</p> <p>Request for further detail to be provided regarding the requirements of a retrofit plan.</p>	<p>The policy text was revised to provide greater clarity when retrofit and refurbishment is required.</p> <p>The supporting text has been revised to provide greater clarity as to what is required in a retrofit plan.</p>

	<p>One respondent raised concern that the embodied carbon targets set out in this policy depart from the London Plan, and may be difficult for developers to achieve.</p>	<p>The policy text has been amended to clarify that the LETI embodied carbon targets are to be used by the council and developers as a reasonable and achievable standard of best practice, but are not absolute limits.</p>
CG5 Overheating	<p>Recommendations that the policy needs to better reflect wider considerations alongside overheating to be in conformity with the London Plan.</p> <p>Respondent suggested it was unnecessary for the council to make policy in this area, as new Building Regulations were introduced in 2021.</p>	<p>Policy text has been amended to include the consideration of sufficient daylight and sunlight levels.</p> <p>The evidence base for the Local Plan demonstrates that it is necessary for the Local Plan to respond to overheating as an impact of the climate crisis, as this as a cause of concern form many residents, and has a substantial impact on health and wellbeing.</p>
CG6 Managing flood risk	<p>Recommendation that this policy required all new basements to be protected from sewer flooding through the installation of a suitable (positive) pumped device.</p> <p>Concerns were raised that the policy places emphasis on resilience and adaption, whereas avoidance measures should be the first priority to locate developments outside of areas at risk of flooding, as supported by the Flood Risk and Coastal Change PPG.</p> <p>Concerns were raised that this policy does not discuss Flood Zone 3b, and recommended that the policy should make it clear that any less/more/highly vulnerable development, including minor development, should not be permitted within FZ3b, as per Table 2 of the PPG.</p>	<p>The policy wording has been amended to accept this suggestion.</p> <p>The policy and supporting text have been revised to require development to implement measures to avoid, control, manage and mitigate the risk of flooding (in that order of priority). The Flood Risk and Coastal Change PPG has also been referenced.</p> <p>Greater clarification has been added to the policy text regarding Flood Zone 3b.</p>

	<p>Recommended that Section 6(a)(i) incorporates additional wording to address developments in proximity to tidal flood defences. Point 6(a)(ii) currently states a requirement of a minimum 8m fluvial buffer strip, due to Environmental Permitting Regulation (EPR) triggers for when a Flood Risk Activity Permit (FRAP) may be typically required, it is recommended that this is changed to a minimum 10m fluvial buffer strip. This also aligns with Biodiversity Net Gain (BNG) Rivers Metric assessment.</p> <p>Recommended that basements being used for sleeping accommodation be classed as highly vulnerable, as per Annex 3 of the NPPF.</p>	<p>The policy text has been amended to now require a minimum of a 10m fluvial buffer strip.</p> <p>Additional clarifications for basements used as sleeping accommodation has been added to the policy and supporting text, to align the policy with the NPPF.</p>
<p>CG7 Sustainable Drainage</p>	<p>Recommendation that the policy include the importance of SuDS for improving the quality of surface water run-off in Tower Hamlets.</p> <p>Concerned that this policy does not mention Schedule 3 of the Flood and Water Management Act, specifically the mandatory requirement for developments to implement SuDS, which is expected to come into force in 2024.</p> <p>Strong support for the requirement of this policy for development proposals to achieve greenfield runoff rates, however it is recommended that the secondary target of a minimum 75% attenuation of pre-existing runoff volumes is removed.</p> <p>It was recommended that the supporting text is expanded to provide more detail regarding</p>	<p>The policy text has been amended to reflect the importance of SuDS for improving the quality of surface water run-off.</p> <p>The policy text has been amended to make reference to Schedule 3.</p> <p>We welcome the strong support for this policy, and have remove the secondary target of a minimum of 75% attenuation.</p> <p>The supporting text has been revised to provide additional details on a catchment based approach, and give additional context on the benefits of water quality interventions.</p>

	implementing a catchment based approach, and give additional context that interventions upstream can benefit sites downstream from a water quality perspective.	
CG8 Water efficient design	<p>Respondents were strongly in support of the ambitions of this policy, as well as the high BREEAM targets set for residential refurbishments and non-residential development and refurbishments.</p> <p>Recommendation that supporting text include more information on how SuDS may be deployed to remove surface water runoff, such as harnessing rainwater as a resource through rainwater recycling and blue roofs.</p> <p>Recommendation that developers are required to demonstrate early engagement with Thames Water.</p>	<p>Supporting text was reviewed and amended to include stronger guidance for deploying SuDS, with additional reference to the Flood and Water Management Act and the sustainable drainage hierarchy.</p> <p>This recommendation has been actioned, and included in the policy text.</p>
CG9 Air Quality	<p>Concerns were raised that it was too onerous to require all major developments to achieve Air Quality Positive, and this was not in line with the requirements of the London Plan.</p> <p>Recommendation that the Port of London Authority (PLA) be consulted on any moorings on the Thames Tidal river.</p> <p>Recommendation to expand the supporting text that “maximising distance from pollutant source” could also take the form of improvements to the public realm in some cases.</p>	<p>After further discussion with the council’s Air Quality team, the policy text has been amended to require Large-scale development proposals, and major development within Air Quality Focus Areas to achieve ‘air quality positive’ standards, in line with the Air Quality Positive LPG (2023).</p> <p>The policy text in regard to air quality associated with residential moorings has been amended to include a requirement to consult with the PLA.</p> <p>The supporting text has been slightly amended to reference that public realm improvements can also support maximising distance from pollutant sources.</p>

CG10 Noise and vibration	<p>Respondents support the inclusion of the agent of change principle and recommend including specific reference to safeguarded wharves and industrial areas.</p> <p>Recommended that the supporting text requires noise assessments to consider daytime and night-time noise where appropriate.</p>	<p>The supporting text has been amended to include specific reference to safeguarded wharves and industrial areas.</p> <p>The supporting text has been amended to include specific reference to day time and night time noise sources.</p>
CG11 Contaminated land and storage of hazardous substances	Comment received raising concern that 'Strategy for the Identification of Contaminated Land' is out of date.	Have confirmed with noise and pollution teams that this document is not out of date.

People, Places and Spaces

Policy	Summary of Comments	How we responded
<p>PS1 Design- and infrastructure-led approach to development</p>	<p>Some comments questioned the need for infrastructure impact assessments, and suggested they were not a requirement of the London Plan.</p> <p>Some respondents questioned the outcomes of the Characterisation and Growth Strategy, particularly the designation of particular areas as ‘conserve’ or ‘enhance’ areas where respondents believed greater levels of development were possible; and some respondents believed the concept of ‘conserve’ areas was overly restrictive.</p> <p>A respondent suggested text regarding ‘enhance’ areas should note the possibility for additional height or density in response to adjoining ‘transform’ areas.</p> <p>Some respondents noted a potential confusion where heritage assets are located within ‘enhance’ areas, and others highlighted concern that the characterisation areas could be the start of a process of regeneration of council estates.</p>	<p>The wording of the infrastructure impact assessment clause was updated to clarify which developments this requirement applied to.</p> <p>No changes were made to the concept of ‘conserve’ or ‘enhance’ character areas, as the process for defining these areas was robustly defined in the evidence base and the concept stems from the London Plan. The responses requesting changes generally presented limited evidence as to why the characterisation was incorrect, and this was usually based around a desire for greater density of development, not around consideration of the character of the areas in question.</p> <p>A slight change to the supporting text wording was made to emphasise that ‘transform’ areas can in part respond to greater densities in adjoining ‘transform’ areas.</p> <p>In relation to comments on policy PS5, a section at the end of this policy on inclusive processes in developing planning applications was moved to policy PS5 and expanded slightly.</p>
<p>PS2 Tall buildings</p>	<p>Responses to this policy were mixed. Many residents were concerned at the potential for more tall buildings in their area, due to impacts on infrastructure and what is perceived as poor living conditions in towers.</p> <p>Some developers and landowners were supportive of the principle of an extended tall building zone, but</p>	<p>Zone F will be re-examined with reference to heritage impacts, and changes have been made to the boundary where necessary to reduce these impacts.</p>

	<p>there were comments that the height limit within Zone F should be relaxed, or that particular sites not included within Zone F should be added to it. There also appeared to be some confusion about site allocations not being included in Zone F.</p> <p>Many developers also complained that the maximum heights provided in the policy for site allocations and tall building zones are too prescriptive and should allow greater flexibility to exceed these heights.</p> <p>A number of developers also criticised the inclusion of a reference to the need for tall buildings to deliver significant benefits in terms of affordable housing.</p> <p>The GLA asked for more detail on heritage sensitivities in and around Zone F, and Historic England also questioned whether the policy addressed potential heritage harms in a comprehensive way. The London Borough of Hackney expressed concern about Zone F being close to conservation areas within their boundary.</p> <p>Some respondents objected to the move of Marsh Wall into the Millwall TBZ, stating that this was ineffective as taller buildings have already been permitted along Marsh Wall.</p> <p>The LLDC asked for Fish Island to be removed from Zone F and for a lower tall building definition to be applied in this area to be in line with the current LLDC plan.</p>	<p>Text has been added to clarify that tall buildings are also permissible within site allocations, to the heights set out in the relevant allocations.</p> <p>Text has been altered to clarify where heights are considered 'appropriate' or 'maximum'.</p>
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<p>PS3 Securing design quality</p>	<p>Responses were generally positive, with most requests for additional text being to elements already captured in other parts of the plan, such as biodiversity and connectivity.</p> <p>One respondent questioned whether it was appropriate to include a reference to securing design quality through planning obligations, and a few respondents questioned whether the policy can request compliance with the High Density Living SPD.</p>	<p>Small amount of additional text added highlighting importance of health and wellbeing outcomes.</p>
<p>PS4 Attractive streets, spaces and public realm</p>	<p>Comments were generally supportive of this policy.</p> <p>Some respondents highlighted issues around accessibility for disabled people, which overlap with the comments on policy PS5. Others noted the need for minor changes of wording to encourage native trees to be planted.</p> <p>Some respondents felt that elements of the policy were too prescriptive.</p>	<p>Only minor wording changes made to emphasise inclusivity and to remove a contradiction between this policy and waste policies later in the plan. Further comments related to inclusivity were addressed through policy PS5.</p>
<p>PS5 Gender inclusive design</p>	<p>Policies were broadly very supportive of the concept of an inclusive design policy, and made numerous suggestions of elements of inclusive design that should be captured, including:</p> <ul style="list-style-type: none"> • Improved street design, with wider pavements and less cluttering street furniture • Improved and additional seating • Facilities such as public toilets and baby-changing rooms • Safe cycling routes which are separated from pedestrian facilities • Additional greenery and green spaces with a range of facilities for different groups of people 	<p>Focus of the policy altered from being specifically about gender inclusiveness to a more generally inclusive design policy. In practice, many of the suggestions provided that would aid people from other vulnerable or marginalised groups were already captured under this policy and PS4, so only some minor additions to the policy wording were required – but significant changes have been made to the supporting text to emphasise the importance of understanding the needs of different groups.</p> <p>A section of Policy PS1 relating to inclusive processes in the development of planning proposals has been</p>

	<p>A number of comments highlighted the importance of considering accessibility for disabled, LGBT, and neurodiverse people, and those from ethnic minorities, as well as gender inclusive design.</p> <p>Proposals were received around the issues that developers should demonstrate they have considered and the documents that should be submitted as part of planning applications to demonstrate inclusivity.</p>	<p>moved to this policy, as this was felt to be a more appropriate location for these considerations.</p>
PS6 Heritage and the historic environment	<p>Some comments suggested that parts of this policy were more restrictive than the NPPF, particularly in relation to changes of use and the balance of harm to heritage assets against public benefits.</p> <p>General support for the plan providing strong protections for heritage.</p> <p>Some concerns were raised about the possible impact of tall buildings, particularly Tall Building Zone F being in close proximity to heritage assets. More evidence was requested to demonstrate that harm to heritage assets will not arise, including the World Heritage Site at the Tower of London.</p> <p>Some respondents requested additional flexibility in relation to mansard roofs in Conservation Areas, stating this would help encourage 'gentle density'.</p>	<p>Wording of the policy updated to more closely follow the established heritage tests set out in the NPPF.</p> <p>Further assessment and refinement of Tall Building Zone F has taken place to determine where heritage harm may have been likely to happen and remove those areas from the zone.</p> <p>No change to position on mansard roofs, due to risk of heritage harm if extra flexibility is created through Local Plan policy – potential impacts should be assessed on a site-by-site basis.</p>
PS7 World Heritage Sites	<p>Question around what the circles on the map represented.</p>	<p>Circles were just intended to highlight World Heritage Sites on the map – removed to avoid confusion.</p>
PS8 Shaping and managing views	<p>Many comments proposed additional landmarks that could be protected, including All Saints Poplar, various</p>	<p>The evidence base document was updated in response to comments, providing additional clarity</p>

	<p>views of the Olympic Park and along Roman Road and Whitechapel Road, Wapping waterfront, and a number of warehouses in Fish Island.</p> <p>One response provided an argument for not including One Canada Square as a protected landmark, on the basis that the building lacks architectural merit, that views are already obscured, that protecting the building would restrict development around it, and that the evidence base study was not clear on whether it was referring to the single building of One Canada Square, or the cluster of buildings around it. Also stated that the policy should not instruct applicants to refer to the evidence base document, as the evidence base is not in itself a policy document.</p>	<p>around protected views of One Canada Square, and considering some of the proposed additional landmarks, though ultimately none of the proposed additions were felt to merit further protection under this particular policy.</p> <p>Guidance from the evidence base was added to the policy as clause 2, to clarify expectations around protected landmarks and views.</p>
PS9 Shopfronts	Clause 2d restricting development to one fascia and one projecting sign is too restrictive.	Change to text to clarify the policy allows one fascia per window.
PS10 Advertisements, hoardings and signage	No comments	N/A
PS11 Siting and design of telecommunications infrastructure	No comments	N/A

Inclusive Economy and Good Growth		
Policy	Summary of Comments	How we responded
EG1 Creating investment and jobs	<p>Safeguarded wharfs should be specifically identified.</p> <p>Restrictions on non-employment uses within Preferred Office Locations should be relaxed.</p> <p>Changes to the descriptions of the designated sites to better reflect their character.</p>	<p>Safeguarded wharfs have been identified, as has the Bow Rail Freight Terminal.</p> <p>More flexibility has been added for changes of use within POLs to reflect changes in the office market, including allowing alternative CAZ Strategic Functions in certain circumstances.</p> <p>Some points were added to the descriptions of the designated locations to better reflect their mixes of businesses and uses, including references to data centres in Blackwall and life sciences in Whitechapel.</p>
EG2 New employment space	<p>Approach to live/work should be reviewed to consider residential standards.</p> <p>References to ‘employment space’ should be refined to separate office and industrial uses.</p> <p>More flexibility should be added to the design criteria in part 5 of the policy to reflect the fact that not all uses can achieve these criteria.</p>	<p>Approach to live/work has been refined to specifically support the Hackney Wick Fish Island warehouse living community, including through discussion with the warehouse living community, taking account of their specific needs and issues and to reflect the important role that these buildings play in the creative and artistic economy.</p> <p>The references to ‘employment space’ have been replaced, where relevant, to refer to the specific use classes (e.g. B1c, B2 and B8 where the site is designated for industrial use).</p> <p>The wording of part 5 has been changed to allow flexibility for those uses that cannot apply these criteria.</p>
EG3 Affordable workspace	<p>Flexibility should be applied for non-standard types of employment space, where it may not be possible or</p>	<p>The policy wording has been amended to allow for some flexibility where an existing low-cost employment space will be retained. The policy has</p>

	<p>feasible to provide affordable workspace in the form that the policy expects.</p> <p>There should be flexibility to allow for developers to operate the space themselves or partner with an affordable workspace provider, rather than offering the head lease to the council.</p> <p>The discount for the service charge is too great and would have an impact on market tenants. The discount is not large enough and some affordable workspace operators may not be able to afford it.</p> <p>Larger developers would like the option of a portfolio-based approach whereby the affordable workspace requirements for several developers can be consolidated on a single site.</p>	<p>also been reworded to explicitly allow applicants to submit viability evidence to demonstrate where they cannot provide the policy requirement.</p> <p>It is essential that the council take on the head lease to ensure that the policy is properly enforced.</p> <p>Objections were received on both sides of the service charge debate. The 50% requirement is a reasonable compromise and the policy and supporting text expect the service charges to be reasonable, meaning that they do not include luxury facilities and other non-essential features.</p> <p>The policy has been revised to allow for a portfolio-based approach where this would deliver a better outcome in terms of public benefit.</p>
<p>EG4 Loss and redevelopment of employment space</p>	<p>Need for 12 months marketing is considered overly onerous.</p> <p>Revisions to how changes of use are assessed within the Canary Wharf POL and Fringe to reflect the changing office market and allow the area to adapt.</p> <p>The definition of Strategic CAZ Functions in the supporting text does not align with the London Plan definition.</p> <p>The policy should differentiate between office and industrial employment space to ensure that industrial space cannot be lost to office development.</p>	<p>The need for at least 12 months of marketing is essential to ensure that an inability to lease a space is based on longer-term oversupply in the market rather than cyclical or seasonal changes.</p> <p>The wording around loss of employment space and changes of use within Canary Wharf have been changed to allow for more flexibility, particular where a change to another Strategic CAZ Function is proposed.</p> <p>The list of Strategic CAZ Functions deliberately excluded hotels and conference centres on the basis that there is a serious proliferation of hotels in the west of the borough and making the policy more permissive towards them risks a significant loss of</p>

		<p>office space. However, the wording has been amended to include hotels and conference centres within the Canary Wharf POL and Fringe on the basis of evidence showing an undersupply of hotels in that area.</p> <p>The policy has been reworded to differentiate between office and industrial uses.</p>
EG5 Railway arches	<p>More flexibility should be allowed for loss industrial floorspace in railway arches in specific locations where an alternative use might achieve better place-making.</p> <p>Railway arches should be excluded from the requirement to provide affordable workspace.</p>	<p>The policy has been reworded to acknowledge that there might be some circumstances in which a public facing town centre or community use might be preferable to an industrial use in a railway arch.</p> <p>Changes to the affordable workspace policy (EG3) allow for exceptions in certain circumstances.</p>
EG6 Data centres	<p>There should be flexibility to allow data centres to come forward outside of the locations designated in the policy.</p> <p>Security concerns mean that data centres cannot typically provide active frontage at ground floor.</p>	<p>The amount of land data centre take and their very low density of employment make them unsuitable for most employment locations, particularly those with a high PTAL.</p> <p>The policy has been amended to recognise that data centres may not be able to provide active frontages and should instead ensure a positive design to supports a good quality public realm.</p>

Town Centres		
Policy	Summary of Comments	How we responded
TC1 Supporting the network and hierarchy of centres	<p>Recommendations for boundary changes to Crossharbour DC, Hackney Wick NC and Stepney Green NC.</p> <p>Questions around the role and necessity of Specialist Centre designations.</p>	<p>There is no justification for a change to the boundary of Crossharbour DC. Hackney Wick NC will be amended to correspond to the LLDC local plan. Stepney Green NC has been reviewed and the boundary will be expanded.</p> <p>Specialist Centres are town centres that would be considered Neighbourhood Centres based on their size, but that play a specific role in the economy based on their mix of businesses. They generally attract visitors from a wider area than NCs and do not necessarily provide for the day to day needs of local residents. The designations assist in protecting the distinctive character of these centres, include the mix of uses.</p>
TC2 Protecting the diversity, vitality and viability of our town centres	<p>Part 6 should allow flexibility for residential entrances and communal facilities at ground floor.</p> <p>The requirement to provide 6 months marketing evidence is overly onerous.</p>	<p>Part 6 has been updated to include flexibility to allow for ground floor residential entrances and communal facilities where they contribute to the activation of the street frontage.</p> <p>6 months is the minimum reasonable amount of time for marketing given the seasonality of retail and other town centre uses and the risk that a temporary economic shock could then lead to a significant loss of retail in town centres.</p>
TC3 Town centre uses outside our town centres	<p>The Retail Impact Assessment Threshold is too low and may restrict larger developments from coming forward that are capable of delivering town centre uses that support other strategic priorities.</p>	<p>The Tower Hamlets-specific threshold is based on the relatively small scale of the businesses in our town centres and the density of the borough, which means that out-of-centre retail would have a disproportionately significant impact on the viability of existing centres.</p>

	Railway Arches outside of town centres should be excepted from the requirement for a sequential test.	Businesses in railway arches are likely to give rise to the same issues as other businesses outside of town centres and there is no justification for exempting them from the sequential test.
TC4 Markets	Making markets outside of town centres only temporary goes against national policy.	Not clear how this goes against national policy.
TC5 Food and drink	Part 4 (hot food takeaways) should not apply to Canary Wharf given the role that food businesses within the estate play relative to the office uses.	The supporting text has been amended to make clear that more flexibility will be applied to Canary Wharf given the role that hot food takeaways play there.
TC6 Entertainment uses	Restrictions on the proliferation of gambling establishments should be removed in Canary Wharf.	No justification for removing these restrictions from Canary Wharf.
TC7 Evening and night-time economy	No comments	
TC8 Short-stay accommodation	<p>Objection to the restriction on the number of new hotel rooms, which was based on the GLA hotel needs projection.</p> <p>Objection to the requirement that new hotel developments not undermine the supply of land for other uses.</p>	<p>This restriction has been removed in acknowledgement that the GLA's hotel needs projection was not intended to act as limit on the number of new hotel rooms.</p> <p>Tower Hamlets has a particularly high housing need, and it is also important to ensure that land for other uses is safeguarded.</p>

Community Infrastructure		
Policy	Summary of Comments	How we responded
CI1 Supporting community facilities	<p>Additional clarity should be provided around the requirement in Part 5 to provide new community facilities in strategic developments.</p> <p>Questioning the town centres first approach to the locations of community facilities.</p>	<p>The supporting text has been revised to clarify that the requirement for new community facilities will be addressed on a case-by-case basis, taking into account the need for facilities and the desires of local residents.</p> <p>Community uses are considered main town centre uses and are, therefore, directed to town centres in the first instance. However, the policy recognises that there are likely to be cases where the nature of a community facility and its intended users makes an out-of-centre location more appropriate.</p>
CI2 Existing community facilities	<p>More detail should be provided regarding what evidence could be provided to justify the loss of a community facility.</p> <p>It should be recognised that a decant strategy is not possible for all types of community facilities (e.g. cinemas)</p>	<p>This is left as to a case-by-case assessment on the basis that the requirements are likely to vary by location, the nature of the facility, and over time.</p> <p>The policy has been amended slightly to add 'where appropriate' to the requirement for a decant strategy.</p>
CI3 New and enhanced community facilities	<p>Request for more flexibility around directing community facilities to town centres.</p> <p>More guidance should be added for the design of health facilities in line with guidance surrounding education facilities.</p>	<p>Minor amendment to wording to add flexibility for certain types of community facilities to be located outside of town centres.</p> <p>No existing guidance regarding the design of health facilities could be found. It is beyond the scope of the plan to provide detailed guidance around the design of health facilities.</p>
CI4 Public houses	<p>Stricter marketing requirements should be imposed, with a 24 month marketing period as a pub, followed by 12 months as a community use.</p>	<p>Given that the current policy has been effective at preventing the loss of pubs in the borough, an additional 12 months of marketing is not considered necessary.</p>

C15 Arts and culture facilities	The GLA includes space for the production and consumption of culture in the same policy. It should be clear how these two types of uses are addressed in the plan.	Further wording here and in the employment policies has been added to clarify that spaces for the production of culture are covered by the employment policies and spaces for the consumption of culture are covered by this policy.
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Biodiversity and Open Space		
Policy	Summary of Comments	How we responded
BO1 Green and blue infrastructure	Include reference to Thames estuary 2100 plan and strategy approach. Clarification of avoiding artificial light spill onto the watercourse and protection of the value of river habitat corridors. Include opportunities to improve the quality of TfL signed routes on the improved green grid network.	We have now included a clear reference to the TE2100 strategy approach and clarified the importance of avoiding artificial light spill on watercourses. Supporting text also refers to improving the quality of TfL signed routes in the green grid network.
BO2 Open spaces and the green grid network	Ensure the policy aligns with the Sport England playing fields policy. Ensure that outdoor green space and parks are accessible for all abilities and ages, specifically teenagers considering their needs. Ensure there is clarification regarding the role of Lee Valley Regional Park Authority and Tower Hamlets' role as a riparian authority.	Policy now includes detail specific to the Sport England fields policy regarding the provision of facilities to enhance active recreation and healthy lifestyles. Examples of different types of play space attractive to all ages and abilities added in this policy and policy B06. Clarification has been given with reference to the role of the Lee Valley Regional Park Authority and tower hamlets role.
BO3 Water spaces	It should be recognised that there are challenges in finding the best route around operational wharves and terminals, a pragmatic solution to achieving safe access around these sites would be required and should be referenced in the supporting text. Developers should be made aware that they will need to contact the Environment Agency where a Water Framework Directive assessment is required to demonstrate how requirements can be met or justified. Make reference to the port of London Authority regarding enhancement of ecological biodiversity and quality of water spaces Thames tidal masterplan. Rewording of additional mooring provision to support the creation of residential moorings.	The supporting text now recognises that in some cases there are challenges when finding the most appropriate and safest route nearby operational wharves and terminals, as such developers will be encouraged to take a pragmatic approach to solve any issues. Supporting text has been added directing developers to the Environment Agency when undertaking a Water Framework Directive assessment on or adjacent to a watercourse. Reference has been added to the Thames Tidal Masterplan: Tower Hamlets and Newham in part 1d of the policy. Supporting text has been added, encouraging the creation of residential moorings.

<p>BO4 Biodiversity and access to nature</p>	<p>Clarify reference to the British Standard BS 42021 for nest boxes, noting that they should be provided for swifts and other small birds. Developers undertaking development proposals within the Canal and River Trusts statutory consultee notified area (especially within 10m of the waterway) should be encouraged to undertake pre-application discussions with the Canal and River Trust to ensure BNG requirements and opportunities are discussed. Ensure BNG is consistent with national standards. Wording to be added to ensure developments where the red line boundary is within 10m of a watercourse, they must carry out the Watercourse Unit Module Element of the BNG assessment, with a minimum of 10% net gain in watercourse units added. Strengthen requirement to manage / eradicate INNS plants by adding (IAS) (Enforcement and Permitting) Order 2019. Supporting text should comply with regulation requiring time-restricted ground works due to periods of specific protected species activity.</p>	<p>Clarification has been added, with reference to BS 42021 and provision added for other small birds. Supporting text added to advise developers to undertake pre-application discussions with the Canal and River Trust where proposals cover the Trusts statutory consultee notified area. Policy text updated to clarify that exemptions should be consistent with national guidance. Requirement for Watercourse Unit Module element of BNG assessment added in supporting text. Reference to managing INNS plants added. Supporting text added regarding the compliance of time-restricted ground works due to periods of specific species activity.</p>
<p>BO5 Urban greening</p>	<p>Urban Greening Factor Native wetland vegetation established in an area of adjacent river or canal to be enhanced only if appropriate and agreed with the Canal & River Trust.</p>	<p>Canal and River Trust added to Table 11: Urban Greening Factors.</p>
<p>BO6 Play and recreation spaces</p>	<p>Ensure that play spaces are fully accessible for a range of ages and abilities and that they are not just centred around parks, but also in amenity spaces nearby community facilities.</p>	<p>Text has been added in the policy, encouraging developers to consider creating play spaces with a mixed range of use and with areas and features which enable those with limited accessibility and neurodiversity to be able to enjoy play space.</p> <p>Policy text has been added, encouraging the provision of new play space at areas nearby existing</p>

		<p>community facilities and areas which have a high deficiency of play space.</p> <p>Policy text has also been included, supporting the provision of play space and the improvement of existing play space, in line with the Play Space Audit.</p>
BO7 Food growing	<p>Policy needs to ensure that new land used for food growing is appropriately assessed for soil contamination.</p> <p>Food growing spaces should be made to better enable disabled inclusion and access.</p>	<p>We have added wording to the policy to require new food growing sites to comply with the Soil Guideline Values set out by the Environment Agency. This is further emphasised in the supporting text to be monitored upon planning approval or by condition.</p> <p>The supporting text encourages developers to design them with accessibility in mind, ensuring there is adequate space provision for wheelchair users where possible and the site is easy to navigate for those with neurodiversity.</p>

Movement and Connectivity		
Policy	Summary of Comments	How we responded
MC1 Sustainable travel	<p>Recommendation that policy should recognise emerging PTAL, and not just current level.</p> <p>Recommended that the Hackney Wick Fish Island North-South route (key route from the HW station across Hertford Union Canal via new Roach Point Bridge could be referenced to reinforce the need to see the route delivered.</p> <p>Recommended that this policy explicitly refer to the LIP target for sustainable mode share of 89% and the MTS geography-based mode share target of 95%.</p>	<p>More detail has been added into the supporting text to include both existing and projected PTAL.</p> <p>This has been added to the list of planned interventions required to support the borough's transport network.</p> <p>The LBTH LIP is reviewed/ refreshed every three years, and greater reference to the LIP has been added to the Local Plan. However the target for sustainable mode share is from the London MTS and not a borough specific targets, so has not been included.</p>
MC2 Active travel and healthy streets	<p>Concerns raised that this policy should consider the need for pick-ups from taxis/dial-a-ride service.</p> <p>Responses were positive about provisions for cycling, but some concerns were raised regarding shared spaces for pedestrians and cyclists, and electric bikes and scooters on bike lanes were raised as a particular source of discomfort.</p>	<p>Greater consideration has been made in the policy and supporting text to address curb side pick-up/ deliveries without obstructing the highway.</p> <p>Greater clarity has been added to the policy text to prioritise separate spaces for cyclists and pedestrians, to support sustainable modes of travel.</p>
MC3 Impacts on the transport network	<p>Responses supported the requirement in the supporting text that Transport Assessments should be accompanied by an Active Travel Zone Assessment, but recommended that this requirement be specified within the policy text.</p>	<p>The policy text has been updated to include reference to Active Travel Zone Assessments.</p>

<p>MC4 Parking and permit-free</p>	<p>Concerns were raised about the requirements for parking in new developments, particularly respondents were concerned that the proposed policy text risked turning the London Plan maximum standards into minimum or target standards. It was also noted that this policy failed to take into account that areas within the CAZ, Metropolitan and Major Town Centres and Opportunity Areas should be car free regardless of the PTAL rating, as required by the London Plan.</p> <p>Concerns were raised that blue badges permit holders report insufficient places to park, and car-free development need to consider parking for disabled people who don't drive but need to be driven by carer/family.</p> <p>Concerns were raised that the requirement for EVCP provision in all parking spaces were too onerous.</p>	<p>The policy text has been reviewed to ensure that parking-free is the starting point for developments across the borough, and there is no mention of 'minimum' standards. It has also been updated to ensure parking standards are in conformity with the London Plan.</p> <p>An additional clause has been added into the policy text to ensure that disabled parking spaces in residential developments are reserved for use by Blue Badge holders, and cannot be sold or leased to other residents. The policy and supporting text has also included greater recognition for the need for pick-up/ drop-off provision, to support disabled residents who don't drive but receive care support at the residence.</p> <p>Planning officers have consulted with TfL, and confirmed that this approach is supported.</p>
<p>MC5 Sustainable delivery, servicing and construction</p>	<p>Recommended that this policy could more strongly refer to active travel, as well as include bus garages in the list of safeguarded uses.</p>	<p>Minor wording amendments made to this policy to reflect these recommendations.</p>

Reuse, Recycling and Waste		
Policy	Summary of Comments	How we responded
RW1 Managing our waste	Further evidence needs to be provided to understand the borough's existing waste management capacity and potential capacity from safeguarded sites and areas of search	Production of an additional Waste Data and Waste Capacity study to determine if there are any issues with regard to waste management capacity.
RW2 New and enhanced waste facilities	Consideration should be given to the agent of change principle for new residential development close to safeguarded waste management sites.	Policy has been updated to cross reference with London Plan D13 Agent of Change
RW3 Waste collection facilities in new development	Waste management collection and storage systems are causing distress to residents.	Concerns have been passed on to waste management and waste strategy teams.

4.25 Summary of responses to Site Allocations

City Fringe sub-area		
Site Allocation	Summary of Comments	How we responded
1.1 Bishopsgate Goods Yard	The developer noted that some elements of the existing permission on the Hackney side have not been captured.	Text added to clarify that this allocation only sets expectations for the Tower Hamlets side of the site.
1.2 London Dock	Developer stated that capacity should be increased in line with a not yet permitted drop-in application, and that heights were not fully reflective of the existing permission.	Heights updated, capacity kept the same as the drop-in application had not yet been permitted.
1.3 Marian Place Gasworks and The Oval	Landowner asked to be removed from the extended boundary, as no capacity work had been undertaken to determine accurate capacity. Developer asked for flexibility to provide a range of housing products, including student housing.	Extension of the site boundary deleted. No additional flexibility for student housing added, as this type of housing is not supported on this site.
1.4 Whitechapel South	A number of developers objected to the restriction of life sciences uses on this site to the NHS site and a small amount on the Whitechapel Estate, and stated that the allocation does not represent landowner aspirations. Another developer objected to the restriction on student housing to Floyer House only, and to restrictions on height.	No loosening of restrictions on life sciences, as housing is considered the greater priority need for the borough at this time. No loosening to restriction on student units, as standard housing is considered the greater priority at this time, and further student housing on this site would not be supported.
1.5 London Metropolitan University	Developer requested greater flexibility on land uses to allow hotel and co-living development alongside student.	No changes to land use, as this site is considered particularly suitable for student housing.
1.6 Whitechapel North	Developers stated that height restrictions and capacities are too restrictive and additional flexibility should be provided.	No changes to height or capacities, as these have been developed through a design-led process. Reference to replacement supermarket parking removed.

	<p>TfL requested that the reference to replacement supermarket parking be removed.</p> <p>Some residents supported the capacities and heights given in this allocation, while others stated they were too high.</p>	
1.7 Brick Lane and Pedley Street	<p>Many respondents stated that the large and disparate area for this allocation was confusing and added complexity to delivery.</p> <p>One developer asked for the site to be added to Tall Building Zone F to reflect aspirations for tall buildings.</p> <p>TfL expressed support for timed closures of Brick Lane to traffic.</p> <p>One developer suggested a residential-led development on the Truman Brewery would be contrary to other policies around town centre and night-time economy uses.</p>	<p>Further development of this site allocation has taken place, with the preparation of a masterplan SPD and a Site Capacity Study. This updated evidence base has been reflected in the updated site allocation.</p> <p>This area will not be added to Tall Building Zone F due to the concentration of heritage assets within it – appropriate locations for greater height have been noted in the allocation.</p>
1.8 Watney Market	<p>Respondent asked for more accessible routes, less clutter, clearer signage.</p> <p>Further internal work determined that delivery on this site was unlikely within the plan period.</p>	<p>Site allocation deleted due to uncertain deliverability.</p>

Central sub-area		
Site Allocation	Summary of Comments	How we responded
2.1 Bow Common Lane	<p>There was a suggestion that development here should provide a contribution to upgrading Mile End Station due to additional pressures it would place on the station.</p> <p>Also a request to add reference to greywater reuse and rainwater harvesting in line with the Integrated Water Management Plan.</p>	Reference to greywater added, but with regards to Mile End Station the site already has permission and the need for additional contributions to transport infrastructure should have been identified before that.
2.2 Chrisp Street	<p>The developer suggested that the heights in the allocation are too restrictive, and that the site should be included in Tall Building Zone F.</p> <p>Respondents suggested extra text referring to connections to Jolly's Green and greywater reuse and rainwater harvesting.</p>	Reference to greywater and Jolly's Green added. With reference to heights, the heights included in the plan are those that have been permitted already, and are considered appropriate. Placing the site into Zone F would reduce the maximum height from the current 88m to 70m.
2.3 Devons Road	<p>Further detail was received from the developer indicating that this site will not necessarily be deliverable within the plan period, as significant consultation on redevelopment with residents has not yet begun.</p> <p>Other responses were mixed, with some residents supportive of regeneration, and some concerned about density. The Canal and River Turst stated the site should contribute to towpath improvements. A resident noted further green spaces within the allocation that they wanted to be protected.</p>	Site allocation deleted due to concerns about deliverability.

Leaside sub-area		
Site Allocation	Summary of Comments	How we responded
3.1 Ailsa Street	Comments were supportive, and noted need for additional references to greywater recycling and lifesaving infrastructure along the river.	Requested references added.
3.2 Leven Road	Comments were supportive, and noted need for additional references to greywater recycling, the Lee Valley Regional park, and lifesaving infrastructure along the river.	Requested references added.
3.3 Aberfeldy Estate	<p>The NHS noted that references to a primary health care centre on this site can be deleted. The developer also questioned the reference to a secondary school.</p> <p>Developer more generally objected that the allocation did not reflect a then-unapproved application for development in terms of layout, height, and capacity, and the provision of a pedestrianised underpass.</p>	Health care reference removed, and secondary school corrected to primary school.
3.4 Bromley-by-Bow	<p>Developers and landowners expressed some concerns that the allocation was too restrictive in terms of heights and capacities, that the layout did not fully match that set out in the LLDC's masterplan SPD for the area, and that the amount of commercial floorspace was too high.</p> <p>There was a request for more detail around the A12 junction improvement, and addition of references to Bow Free Wharf and the need to protect the use of the wharf. Request for additional references to lifesaving infrastructure along the river Lea, and to the Lee Valley Regional Park.</p>	Requested references for additional detail added. In terms of capacities and heights, while it is recognised that there are some differences from the SPD due to concerns about heritage impacts, the overall indicative capacity of the site remains very similar to that planned by the LLDC, once areas that have already completed delivery are taken into account.

<p>3.5 Blackwall Trading Estate and Leamouth Road Depot</p>	<p>Developer requested more flexibility in terms of land use to allow for development of co-living on this site.</p> <p>There were requests for more information and clarity on the delivery of the bridge and primary health care facility.</p> <p>A developer requested additional height in the northern part of the site, while another response expressed concern that the proposed heights in the north are too tall and would overshadow the waterspace.</p> <p>Developers asked for extra flexibility with regard to reproviding industrial space, stating this should be subject to viability or that certain parts of the designated industrial location should not be counted.</p> <p>One response noted that the protected viewpoint of Balfron Tower has been moved, which allows for greater height on the southernmost part of the site.</p>	<p>Heights and capacities have been reassessed for this site to account for the movement of the protected view of Balfron Tower.</p> <p>Text has been updated to provide additional clarity on the bridge and health care facility.</p> <p>No change to the level of flexibility on industrial land, as this is an important use in the borough; and no additional flexibility for co-living housing, as this is not considered suitable for this site.</p>
<p>3.6 Hackney Wick Station</p>	<p>There was a request for a reference to reprovion of the existing theatre use and to improve pedestrian and cycle connections.</p>	<p>Requested references added.</p>
<p>3.7 Hepscoth Road</p>	<p>The LLDC requested a number of minor changes to better reflect the existing planning permission on this site.</p>	<p>Minor changes made and site map updated.</p>
<p>3.8 Sweetwater</p>	<p>The LLDC requested a number of minor changes to better reflect the existing planning permission on this site.</p>	<p>Minor changes made to heights and existing permission references and site map updated.</p>

<p>3.9 Teviot Estate</p>	<p>The NHS noted that references to a primary health care centre on this site can be deleted. The developer also questioned the reference to a secondary school.</p> <p>Sports England requested clarity that no playing field space would be lost at Langdon Park, and the Canal and River Trust suggested that development should contribute to towpath improvements.</p> <p>The developer requested the boundary to be extended to include a significant amount of extra land around the estate, and were concerned that the application did not reflect pre-application work that had been undertaken and was too restrictive on heights and capacities.</p>	<p>Health care reference removed, and secondary school corrected to primary school.</p>
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Isle of Dogs and South Poplar sub-area		
Site Allocation	Summary of Comments	How we responded
4.1 Aspen Way	Developers asked for more flexibility on heights and capacity, and noted the unlikelihood of the proposed decking-over of Aspen Way, stating that this would most probably not be viable.	Site capacities and layout re-examined and updated due to the unlikelihood of being able to bridge Aspen Way.
4.2 Billingsgate Market	The City of London asked for additional flexibility on land uses and heights, and for the removal of reference to the school and freight centre. Canal and River trust expressed concerns about the heights along the waterfront.	Site capacities and layout re-examined and updated due to the removal of the school.
4.3 Crossharbour	Local residents strongly objected to the inclusion of the ST John's Community Centre within the boundary, stating they do not want it to be redeveloped. Developer requested that student and co-living be made acceptable uses on this site and that heights be increased in the western part of the allocation, as this area is within Tall Building Zone C.	Site capacities and layout re-examined and updated on the western side of the site to reflect tall building designation. St John's Community Centre removed from the boundary. Student and co-living units are not considered appropriate on this site.
4.4 Limeharbour	Developer asked for more flexibility on land uses and heights, and to allow student and co-living development on the site.	Site capacities and layout re-examined and updated due to the removal of the school from the Skylines site. Student housing and co-living are not considered appropriate on site allocations, so no further changes.
4.5 Marsh Wall East	Developers asked for more flexibility on heights, land use requirements, and infrastructure delivery. One landowner was concerned that the agent of change principle needed to be more clearly emphasised to allow continued operation of a data centre.	Some wording added to emphasise agent of change principle.
4.6 Marsh Wall West	Developers asked for more flexibility on land uses and heights, to allow student and co-living development on the site, and to allow developers	Reference to primary health care facility removed, reference to greywater systems added. Allowing dock infill would contradict policies earlier in the plan, and

	<p>to infill the dock to provide more land for development.</p> <p>The NHS stated that the need for a primary health care facility could be removed.</p> <p>There was a request for reference to greywater reuse.</p>	<p>student housing and co-living are not considered appropriate on site allocations, so proposed site for building into the dock removed from the boundary.</p>
4.7 Millharbour	<p>Developer requested that capacities reflect existing permissions.</p> <p>There was a request for references to rainwater harvesting and greywater reuse.</p>	<p>Requested references to rainwater harvesting and greywater reuse made. Capacities already reflect existing consents, so no further change made.</p>
4.8 North Quay	<p>Canary Wharf group proposed some minor changes to wording to correct mistakes, and asked for flexibility on land uses, heights and capacities.</p> <p>There was a request for references to rainwater harvesting and a new dock outfall.</p>	<p>Requested references to rainwater harvesting and dock outfall made.</p>
4.9 Reuters	<p>Developer requested that reference to primary school delivery be removed.</p> <p>There were requests for reference to a new river outfall, and the permission for a riverbus facility.</p>	<p>Requested references to river outfall and riverbus service made.</p>
4.10 Riverside South	<p>Canal and River Trust requested that the operational requirements of the dock be considered, and there was a request to include reference to lifesaving infrastructure on the waterside.</p> <p>Developer requested additional flexibility around land uses, capacities and heights.</p>	<p>Requested wording changes around the docks and waterside made.</p>

<p>4.11 Westferry Printworks</p>	<p>Developer noted that allocation did not reflect their aspirations through pre-application process in terms of height and capacity, and wanted the open space requirement to be reduced.</p> <p>There was a request to reference a new dock outfall.</p>	<p>Minor change made to reference dock outfall.</p>
<p>4.12 Wood Wharf</p>	<p>Canary Wharf group proposed some minor changes to wording to correct mistakes, and asked for flexibility to provide other kinds of residential development including co-living and student, and for more flexibility on heights and capacities to deliver a denser scheme.</p> <p>There was a request to reference a new dock outfall and greywater reuse facilities.</p>	<p>Minor updates to text made, no extra flexibility for student and co-living as these are not considered appropriate for this site.</p>
<p>4.13 10 Bank Street</p>	<p>Canary Wharf group proposed some minor changes to wording to correct mistakes, and asked for flexibility to provide other kinds of residential development including co-living and student, and for more flexibility on heights and capacities to deliver a denser scheme.</p>	<p>Minor updates to text made, no extra flexibility for student and co-living as these are not considered appropriate for this site.</p>
<p>4.14 Hertsmere House</p>	<p>Very few responses received, including no response from the landowner or developer. Canary Wharf Group supported the allocation.</p>	<p>Site allocation deleted due to concerns about deliverability, and low site capacity assessment.</p>
<p>4.15 Samuda Estate</p>	<p>Developer asked for the site to be split into two component parts as these were at different stages of resident engagement. Significant criticisms of the site from residents, who did not want to see redevelopment.</p>	<p>Site allocation deleted due to concerns about deliverability and suitability.</p>
<p>4.16 Westferry/Park Place</p>	<p>Canary Wharf group proposed some minor changes to wording to correct mistakes, and asked</p>	<p>Minor updates to text made, no extra flexibility for student and co-living as these are not considered appropriate for this site.</p>

	for flexibility to provide other kinds of residential development including co-living and student.	
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5 Next steps

As highlighted in this document, the findings and feedback from the Regulation 18 consultation have helped to inform the redrafting of policies for the Regulation 19 draft plan. In addition to this, the plan-making team have based policy changes off new evidence and up-to-date research that has been provided from both internally and externally produced studies into the current and future trends in the borough.

This draft Local Plan will be consulted on, as a statutory part of the plan-making process over a six-week period, allowing residents and stakeholders to see how their input has shaped the new Local Plan and enabling them to provide further comment and feedback to help shape the future of the borough. This consultation will be in the Autumn of 2024, and a full consultation strategy will be published to outline how the council looks to engage as many residents and stakeholders as possible in an inclusive, accessible, representative and interactive way.

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Local Plan 2038: Evidence Base Library

Delivering the Local Plan

Reference	Evidence Base Documents
DLE01	Local Plan Viability Assessment (2024)
DLE02	Joint Strategic Needs Assessment: Spatial Planning and Health Needs Assessment (2023)
DLE03	Affordable Housing and Viability SPG (GLA, 2017)
DLE04	Central Area Good Growth SPD (2021)
DLE05	City Fringe Opportunity Area Planning Framework (GLA, 2015)
DLE06	Control of Dust and Emissions SPG (GLA, 2014)
DLE07	Isle of Dogs and South Poplar Opportunity Area Planning Framework (GLA, 2019)
DLE08	Tower Hamlets Planning Obligations SPD (2021)
DLE09	Queen Mary University of London SPD (2021)
DLE10	South Poplar Masterplan SPD (2021)
DLE11	Tower Hamlets Code of Construction Practice (2023)
DLE12	Tower Hamlets Council Strategic Plan (2022)
DLE13	Circular Economy Statements LPG (GLA, 2022)
DLE14	Tower Hamlets Green Grid Strategy: Update (2017)
DLE15	Healthy Streets for London (GLA, 2017)
DLE16	Isle of Dogs and South Poplar Integrated Water Management Plan (GLA, 2020)
DLE17	London Heat Network Manual (GLA, 2021)
DLE18	Heat Networks: Proposals for Zoning (Department for Business, Energy & Industrial Strategy, 2022)
DLE19	Tower Hamlets Health and Wellbeing Strategy (2021)
DLE20	Tower Hamlets Water Space Study (2017)
DLE21	UK Digital Strategy (Department for Digital, Culture, Media and Sport, undated)
DLE22	Sub-regional Integrated Water Management Strategy East London (GLA, 2023)
DLE23	Tower Hamlets Infrastructure Delivery Plan 2023
DLE24	Tower Hamlets Conservation Strategy, 2017
DLE25	Tower Hamlets Air Quality Monitoring Report
DLE26	Tower Hamlets Air Quality Action Plan, 2022
DLE27	Tower Hamlets Health and Well-being Strategy, 2021
DLE28	Tower Hamlets Development Viability SDP, 2017
DLE29	Affordable Housing and Viability SPG. 2017
DLE30	Good Growth Principles in the London Plan
DLE31	Proposals for heat network zoning, 2022

DLE32	London Heat Network Manual II, 2021
DLE33	Sub-regional Integrated Water Management Strategy (SWIMS) for East London, 2023
DLE34	Isle of Dogs and South Poplar Integrated Water Management Plan (IWMP), 2020
DLE35	Isle of Dogs, South Poplar and Leaside Local Area Energy Plan, 2022
DLE36	Tower Hamlets Surface Water Integrated Management Strategy
DLE37	Isle of Dogs Feasibility Study (Electricity Connectivity), UKPN, 2023
DLE38	UK Digital Strategy, 2022
DLE39	Sub-regional Digital Strategy
DLE40	Digital Infrastructure Strategy and Action Plan: Isle of Dogs, South Poplar, and Lower Leaside Areas, 2022
DLE41	Utilities and Heat Network Topic Paper, 2024
DLE42	Foul Sewerage and Utilities Statement
DLE43	Optimising Site Capacity: A Design-led Approach LPG, 2023

Homes for the Community

Reference	Evidence Base Documents
HFE01	Tower Hamlets Local Housing Needs Assessment (2023)
HFE02	Nationally Described Space Standards (Department for Communities and Local Government, 2015)
HFE03	Homes for Londoners: Affordable Housing and Viability SPG (GLA, 2017)
HFE04	Development Viability SPD (2017)
HFE05	Tower Hamlets High Density Living SPD (2020)
HFE06	Housing Design Standards LPG (GLA, 2023)
HFE07	Housing SPG (GLA, 2016)
HFE08	London Legacy Development Corporation Local Plan (LLDC, 2020)
HFE09	London Strategic Housing Land Availability Assessment (GLA, 2017)
HFE10	Tower Hamlets Housing Strategy (2016)
HFE11	Tower Hamlets Housing with Care Strategy (2023)
HFE12	Topic Paper: Financial contributions in lieu of affordable housing on smaller developments (2024)

HFE13	British Standard BS8300: Design of an accessible and inclusive built environment
HFE14	Tower Hamlets Gypsy and Traveller Accommodation Assessment 2016
HFE15	Emerging London Gypsy Traveller Accommodation Need Assessment (TBC 2024)
HFE16	Tower Hamlets Housing with Care Strategy, 2024
HFE17	GLA Good practice guide to estate regeneration, 2016
HFE18	GLA Housing SPG, 2016
HFE19	London Legacy Development Corporation Local Plan, 2020
HFE20	GLA Strategic Housing Land Availability Assessment, 2017

Clean and Green Future

Reference	Evidence Base Documents
CGE01	Tower Hamlets Strategic Flood Risk Assessment (2024)
CGE02	Local Flood Risk Management Strategy (2016)
CGE03	Tower Hamlets Net Zero Carbon Policy Evidence Base (2023)
CGE04	Tower Hamlets Net Zero Carbon Plan (2020)
CGE05	Tower Hamlets Air Quality Action Plan (2022)
CGE06	Strategy for the Identification of Contaminated Land (2022)
CGE07	Delivering Net Zero (2023)
CGE08	Topic Paper: Water Efficiency (2024)
CGE09	Topic Paper: Sustainable Drainage Systems (SuDS) (2024)
CGE10	Topic Paper: District Heating (2024)

People, Places and Spaces

Reference	Evidence Base Documents
PSE01	Gender Inclusive Design – creating a welcoming, inclusive and restorative borough (2024)

PSE02	Conservation Strategy (2023)
PSE03	Optimising Site Capacity: A Design-led Approach to Development LPG (GLA, 2023)
PSE04	Tower Hamlets Views and Landmarks Study (2024)
PSE05	Tower Hamlets Characterisation and Growth Strategy (2023)
PSE06	Topic Paper: Tall Buildings (2024)

Inclusive Economy and Good Growth

Reference	Evidence Base Documents
EGE01	Tower Hamlets Employment Land Review (2023)
EGE02	Tower Hamlets Affordable Workspace Study (2023)
EGE03	London Industrial Land Supply Study (GLA, 2020)
EGE04	Strategic Evidence to Support Article 4 Directions (GLA, 2021)
EGE05	CAZ Economic Futures Research (GLA, 2021)
EGE06	Industrial Intensification and Co-location Study (GLA 2018)
EGE07	London Office Policy Review (GLA 2017)

Town Centres

Reference	Evidence Base Documents
TCE01	Town Centre and Retail Study (2023)
TCE02	London Town Centre Health Check Analysis (GLA, 2018)
TCE03	Projections of demand and supply for visitor accommodation and accessible hotel rooms (GLA, 2017)
TCE04	Culture and the night-time economy SPG (GLA, 2017)

Community Infrastructure

Reference	Evidence Base Documents
CIE01	Arts and Culture Topic Paper (2023)
CIE02	Tower Hamlets Leisure Facilities Strategy (2018)
CIE03	Tower Hamlets Indoor Sports Facilities Strategy (2017)

CIE04	Pubs in Tower Hamlets Evidence Base Study (2016)
CIE05	Pubs in Tower Hamlets Addendum (2023)
CIE06	Planning and Social Cohesion Evidence Base (Leaside Area Action Plan) (2020)
CIE07	Planning for Sport Guidance (Sport England, 2019)
CIE08	Health Building Note 00-01: General design guidance for healthcare buildings (Department of Health, 2014)
CIE09	Culture for all Londoners: Mayor of London's Culture Strategy (GLA, 2018)
CIE10	Active Design: Creating Active Environments Through Planning and Design (Sport England, undated)
CIE11	Area guidelines for mainstream schools (Department for Education, 2014)
CIE12	Cultural Infrastructure Plan (GLA, 2019)
CIE13	Tower Hamlets Physical Activity and Sport Strategy (2019)
CIE14	Baseline Designs for Schools Guidance (Education and Skills Funding Agency, 2014)
CIE15	Community Facilities Needs Assessment (2024)
CIE16	Leisure Facilities Assessment (2024)

Biodiversity and Open Space

Reference	Evidence Base Documents
BOE01	Tower Hamlets Biodiversity Net Gain Feasibility Study (2023)
BOE02	Tower Hamlets Review of Sites of Importance for Nature Conservation (2023)
BOE03	Thames Estuary 2100 Plan (2023)
BOE04	Thames river basin district river basin management plan (2022)
BOE05	Active Design Guidance (Sport England, 2023)
BOE06	All London Green Grid SPG (GLA, 2012)
BOE07	Tower Hamlets Green Grid Strategy Update (2017)
BOE08	Infrastructure Delivery Plan (2017)
BOE09	Lea River Park Design Manual (LLDC, 2016)
BOE10	Lea River Park Primer (LLDC, 2016)
BOE11	Tower Hamlets Open Space Strategy (2017)
BOE12	Tower Hamlets Playing Pitch Assessment (2017)
BOE13	Playing Pitches Options for Future Investment (2018)
BOE14	Review of Site of Importance for Nature Conservation (2016)

BOE15	Thames Vision 2050 (Port of London Authority, undated)
BOE16	Tower Hamlets Local Biodiversity Action Plan (2019)
BOE17	UK Marine Policy Statement (HM Government, 2011)
BOE18	Tower Hamlets Water Space Study (2017)
BOE19	Play Space Audit (2024)

Movement and Connectivity

Reference	Evidence Base Documents
MCE01	Tower Hamlets Strategic Transport Assessment (2017)
MCE02	Tower Hamlets Transport Strategy (2019)
MCE03	Lower Lea Valley Connection and Movement Study (2020)
MCE04	Tower Hamlets Parking and Freight Study (2017)
MCE05	Tower Hamlets East of the Borough AAP Transport Report (2020)
MCE06	Tower Hamlets Cycling Strategy (2016)
MCE07	Healthy Streets for London (GLA, 2017)
MCE08	Isle of Dogs & South Poplar Local Connections Strategy (TfL, 2019)
MCE09	Sustainable Freight Strategy (2024)

Reuse, Recycling and Waste

Reference	Evidence Base Documents
RWE01	Tower Hamlets Waste Data Study (2023)
RWE02	National Planning Policy for Waste (Department for Communities and Local Government, 2014)
RWE03	Reuse, Recycling and Waste SPD (2021)
RWE04	Tower Hamlets Waste Management Strategy (2018)
RWE05	Waste Data and Capacity Assessment (2024)

Site Allocations

Reference	Evidence Base Documents
SAE01	Tower Hamlets Infrastructure Delivery Plan (2024)
SAE02	Tower Hamlets Site Capacity Study (2024)
SAE03	Whitechapel Sites Capacity Study (2024)

SAE04	Brick Lane and Pedley Street Site Capacity Study (2024)
SAE05	Site Assessment Methodology Paper (2024)

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