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# **Report on Spitalfields Neighbourhood Plan 2020 - 2035**

**An Examination undertaken for London Borough of Tower Hamlets Council with the support of the Spitalfields Neighbourhood Planning Forum on the October 2020 submission version of the Plan.**

Independent Examiner: Jill Kingaby BSc Econ MSc MRTPI

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Intelligent Plans and Examinations (IPE) Ltd, 3 Princes Street, Bath BA1 1HL  
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## **Main Findings** - Executive Summary

From my examination of the Spitalfields Neighbourhood Plan (the Plan/SpNP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Spitalfields Neighbourhood Planning Forum (the Forum);
- The Plan has been prepared for an area properly designated – Spitalfields as shown on Figure 1.1 of the Plan;
- The Plan specifies the period to which it is to take effect – 2020-2035; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendums on the basis that it has met all the relevant legal requirements.

I have considered whether the referendums area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## **1. Introduction and Background**

### *Spitalfields Neighbourhood Plan 2020-2035*

1.1 Spitalfields has a long and rich history. It takes its name from The New Hospital of St Mary without Bishopgate, founded in 1197 and known as St Mary's Spital. Located just outside the walls of the historic City of London, archaeological studies have found significant evidence of Roman occupation in Spitalfields. Spitalfields Market began on a field near the hospital in the 13<sup>th</sup> century and moved to the present premises in 1887. Gun Street, Artillery Lane and Artillery Passage are reminders of the area's military and industrial past. Development accelerated at Spitalfields after the Great Fire of London in 1666, and Georgian housing was erected around the market. The terraces in Elder, Folgate, Fournier, Wilkes, Princelet and Hanbury Streets are still in place, reflecting this period of elegant architecture and construction. Christ Church with its iconic spire, facing towards Bishopsgate and the City of London, was consecrated in 1729, and formed a dominant building within Spitalfields thereafter.

1.2 Huguenots fleeing from France in the early nineteenth century settled in Spitalfields, and established a new creative industry based on silk weaving. Jewish immigrants escaping pogroms in Eastern Europe settled

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in the area later in the 1800s, and the former French Protestant church in Fournier Street became a synagogue. In the late twentieth century, a Bangladeshi community settled in the area, becoming well known for its restaurants along Brick Lane. The synagogue mentioned above was converted to a mosque. The area's many heritage buildings, its markets and business outlets, restaurants and shops reflect its rich history and ongoing cultural diversity. The process of London's evolution from a series of ancient hamlets into densely populated, inner-city communities is evident in Spitalfields. The character of Spitalfields contrasts sharply with neighbouring areas, notably the City of London, Whitechapel and Shoreditch. The importance of Spitalfields' history is reflected in the designation of four conservation areas and many listed buildings and structures. Much of Spitalfields is an Archaeological Priority Area.

- 1.3 Spitalfields today contains many residential and business premises. The Census 2011 records a population of 12,578 for the Spitalfields and Banglatown Ward (which covers a wider area than this Neighbourhood Plan).<sup>1</sup> Paragraph 2.13 of the SpNP provides an estimate of 6,572 residents in the Neighbourhood Area. 7,235 residents within the Ward were described as BME (black or minority ethnic), of whom 5,121, or 41% of the total population, were of Bangladeshi origins in 2011. The Census indicated that a low proportion (25.9%) of the ward's households were owner-occupiers in 2011, compared to the London average of 49.9%. 38.6% of households lived in private-rented accommodation, and 34.3% in social-rented homes.
- 1.4 Spitalfields has grown as an employment centre in recent years, reflecting the success and development of the nearby City of London. Spitalfields' many markets, restaurants, bars/pubs and buildings have become major attractions for tourists. A strong commercial hub has developed around the Truman Brewery, with a fashion and creative focus, and there have been spinoffs from the tech industry based at Shoreditch and Old Street roundabout. Brick Lane was defined as a district centre in the Tower Hamlets Local Plan, 2020.
- 1.5 The Spitalfields Society and Spitalfields Community Group decided in December 2013 to set up an Interim Steering Group (ISG) which would establish a neighbourhood forum and define a neighbourhood area. Throughout 2014, the ISG liaised with the Strategic Planning Team at the London Borough of Tower Hamlets over area boundaries and compiled a list of local stakeholders so that it could engage with all sections of the community. In April 2016, London Borough of Tower Hamlets approved the Spitalfields Neighbourhood Area, established the Spitalfields Business Neighbourhood Area, and approved the Spitalfields Neighbourhood Planning Forum. The Forum then undertook public consultation and preparatory work over the next four years to produce a Spitalfields Neighbourhood Plan. Regulation 14 (pre-Submission) consultation on a

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<sup>1</sup> London Borough of Tower Hamlets website – Spitalfields and Banglatown Ward Profile 2014.

draft Neighbourhood Plan was undertaken between 20 July and 14 September 2020, ahead of the publication of the Submission Version (October 2020), which is the subject of this examination.

### *The Independent Examiner*

- 1.6 As the Plan has now reached the examination stage, I have been appointed as the examiner of the SpNP by the London Borough of Tower Hamlets, with the agreement of the Spitalfields Neighbourhood Forum.
- 1.7 I am a chartered town planner and former Government Planning Inspector, with prior experience examining neighbourhood plans in London and elsewhere in England. I am an independent examiner, and do not have an interest in any of the land that may be affected by the submitted Plan.

### *The Scope of the Examination*

- 1.8 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to referendums<sup>2</sup> without changes; or
  - (b) that modifications are made and that the modified neighbourhood plan is submitted to referendums; or
  - (c) that the neighbourhood plan does not proceed to referendums on the basis that it does not meet the necessary legal requirements.
- 1.9 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
  - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
    - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
    - it sets out policies in relation to the development and use of land;
    - it specifies the period during which it has effect;

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<sup>2</sup> In accordance with paragraphs 12(4) and 15 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the draft Plan relates to a neighbourhood area that has been designated as a business area under section 61H of the 1990 Act. The combined effect of these provisions is that an additional business referendum is required.

- it does not include provisions and policies for 'excluded development'; and
- it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendums boundary should be extended beyond the designated area, should the plan proceed to referendums.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.10 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

### *The Basic Conditions*

1.11 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>3</sup>; and
- Meet prescribed conditions and comply with prescribed matters.

1.12 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.<sup>4</sup>

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<sup>3</sup> The existing body of environmental regulation is retained in UK law.

<sup>4</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

## 2. Approach to the Examination

### *Planning Policy Context*

- 2.1 The Development Plan for Spitalfields, not including documents relating to excluded minerals and waste development, is the Tower Hamlets Local Plan - 2031, adopted in January 2020, and the London Plan, adopted 2 March 2021.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 19 February 2019, and all references in this report are to the February 2019 NPPF and its accompanying PPG.

### *Submitted Documents*

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including:
- the SpNP 2020 -2035, October 2020;
  - Figure 1.1 of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
  - the Consultation Statement – draft 4, October 2020;
  - the Basic Conditions Statement, October 2020;
  - the Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report prepared by the London Borough of Tower Hamlets, October 2020;
  - all the representations that have been made in accordance with the Regulation 16 consultation; and
  - the response by Spitalfields Neighbourhood Forum (6 April 2021) to my letter of 23 March 2021.<sup>5</sup>

### *Site Visit*

- 2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 27 May 2021 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

### *Written Representations with or without Public Hearing*

- 2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as my reading of the Plan and supporting evidence, including the consultation responses and the Forum's response in April 2021 to my questions, clearly articulated the objections to the Plan, and presented arguments for and against the Plan's suitability to proceed to referendums.

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<sup>5</sup> View at:

[https://www.towerhamlets.gov.uk/lgnl/planning\\_and\\_building\\_control/planning\\_policy\\_guidance/neighbourhood\\_planning/Spitalfields.aspx](https://www.towerhamlets.gov.uk/lgnl/planning_and_building_control/planning_policy_guidance/neighbourhood_planning/Spitalfields.aspx)

## *Modifications*

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

## **3. Procedural Compliance and Human Rights**

### *Qualifying Body and Neighbourhood Plan Area*

- 3.1 The SpNP has been prepared and submitted for examination by Spitalfields Neighbourhood Forum. The London Borough of Tower Hamlets made the decision to designate the Spitalfields Neighbourhood Planning Area as a Neighbourhood Business Planning Area on 5 April 2016. On the same date, the Spitalfields Neighbourhood Planning Forum was approved as the Neighbourhood Planning Forum for the Spitalfields Neighbourhood Planning Area. A further decision made on 3 March 2021 effected the redesignation of the Spitalfields Neighbourhood Planning Forum for another period of five years, with effect from 5 April 2021.
- 3.2 It is the only neighbourhood plan for Spitalfields and does not relate to land outside the designated Neighbourhood Plan Area.

### *Plan Period*

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2020 to 2035.

### *Neighbourhood Plan Preparation and Consultation*

- 3.4 From 2014 onwards the Forum's ISG liaised with the Council's Strategic Planning Team. The first major consultation event in July 2014 was a meeting for local stakeholders and the second event, in August 2014, was for meeting the general public. Ahead of these events, a leaflet "Your Spitalfields: Your Future" was delivered to every residential and business address in the central Spitalfields area, inviting attendance at the events. Based on discussion at these meetings, the boundaries of the proposed neighbourhood area and the terms of the proposed constitution were set. A committee consisting of 12 members (6 residents, 3 business members and 3 local organisations) was elected at the inaugural meeting. An application for area designation in December 2014 led to exchanges between the ISG, local business organisations and the Council. The boundaries were revised and in April 2016, the London Borough of Tower Hamlets designated the Spitalfields Neighbourhood Area as a Business Neighbourhood Area and approved the Spitalfields Neighbourhood Planning Forum (see paragraph 3.1 above).



- 3.5 In 2015 and 2016, a “consultation framework” was set up for use by variously themed policy working groups, to ensure that they operated within common parameters. The working groups researched existing planning policy on relevant areas of interest and reached out to the local community to understand their views on particular problems and opportunities. In 2017, the process was refined and consultation was sub-divided between “local stakeholder consultations” (primarily local businesses and other organisations with an interest in Spitalfields) and a second group (general public, local residents and workers).
- 3.6 Of some 40 local stakeholders invited to take part in consultations, 27 agreed. Participants are named in Appendix B of the Consultation Statement, which demonstrates that there has been a positive level of representation of the Area’s major owners, businesses and community groups engaged in the consultation exercise. Face-to-face interviews were held in 2017 and 2018, and the results are reported in the SNPF Community Consultation – Stakeholder Research Project 2018, by Gracechurch. The Main Findings give responses to these key questions:
- What do organisations value most about Spitalfields today?
  - What hinders stakeholders in the way Spitalfields works today?
  - How could the Forum’s policies make Spitalfields better?
- 3.7 In September 2017, the Forum engaged with The East London Citizens’ Organisations (TELCO) to seek the views of harder-to-reach communities. It ran an advertisement in Bengali in the Janomot newspaper and delivered bilingual leaflets to more than 5,000 local households. TELCO collected some 231 paper returns from members of the public at selected locations such as the Brick Lane mosque and a Sikh community centre. The Consultation Statement describes a number of initiatives taken to inform and involve people from all social groups. In March 2018, general public consultation ended and, online, 1,809 people had visited the survey site. 402 people made 602 separate comments, and 1,492 submitted endorsements of other people’s comments. These complemented the 231 paper returns. The profile of the people responding to the survey was analysed and compared with the data from the 2011 Census for the Spitalfields and Banglatown ward. The profile was found to correspond closely, indicating that the efforts made to engage with all social groups in the area, especially the harder-to-reach, had been successful.
- 3.8 The survey results were used to draft a “Vision for Spitalfields”, and three “core and achievable objectives” for Spitalfields. The policy working groups investigated these in depth and worked with other parties to produce a draft SpNP which proceeded to Regulation 14 consultation between 20 July and 14 September 2020. This consultation exercise was publicised by way of a leaflet hand-delivered to every address in the Area, with information and the Plan document presented on the SpNP Forum website. A range of statutory bodies and other bodies including local business and major landowners, owners of proposed non-designated heritage assets and local green spaces were informed in writing.

Representations were received from 38 residents, 3 businesses, 13 local stakeholders and 9 statutory consultees.

- 3.9 These responses were used to amend the draft SpNP and produce the Submission Version in October 2020. The Regulation 16 consultation took place between 7 January and 18 February 2021, and 49 responses were received. I have taken account of all these representations in examining the SpNP. Overall, I am satisfied that the consultation process has been carried out in a very thorough and professional manner. The legal requirements for consultation i.e. procedural compliance, have been met and regard has been had to the advice in the Government's PPG on plan preparation and engagement.

#### *Development and Use of Land*

- 3.10 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

#### *Excluded Development*

- 3.11 The Plan does not include provisions and policies for 'excluded development'.

#### *Human Rights*

- 3.12 The Basic Conditions Statement, in paragraph 5.4, states that the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights. Neither the London Borough of Tower Hamlets nor other consultees have alleged that there would be a breach of Human Rights (within the meaning of the Human Rights Act 1998), and from my independent assessment, I see no reason to disagree.

### **4. Compliance with the Basic Conditions**

#### *EU Obligations*

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by the London Borough of Tower Hamlets, which found that it was unnecessary to undertake SEA. Having read the Strategic Environmental Assessment Screening Opinion, I support this conclusion.
- 4.2 The SpNP was further screened for Habitats Regulations Assessment (HRA), and the London Borough of Tower Hamlets considered that the SpNP would not have any additional significant impact, either by itself or cumulatively with other plans and programmes, over the adopted Local Plan. It was concluded that no further HRA was required. There are no European protected or Ramsar sites in close proximity to the Neighbourhood Area. Natural England, Historic England and the Environment Agency agreed with the Council's conclusion, as section 9 of

the SEA and HRA Screening Report explains. From my independent assessment of this matter, I agree that further HRA is not required.

### *Main Issues*

- 4.3 I have assessed whether the SpNP complies with the Basic Conditions for neighbourhood planning as two main matters:
- General issues of compliance of the Plan, as a whole; and
  - Specific issues of compliance of the Plan policies.

### *General Issues of Compliance of the Plan*

- 4.4 Chapter 1: Introduction begins by describing briefly the "Purpose of the plan", confirming the time period for the SpNP (2020-35), and stating that the principal purpose is to guide development within the Spitalfields area, providing guidance for those wishing to submit planning applications. Chapter 1 then describes the "Policy context", explaining that the adopted SpNP will represent part of the Development Plan for the area, along with the Tower Hamlets Local Plan and London Plan. Tower Hamlets Local Plan was adopted in January 2020. I note that the SpNP includes references to "the draft London Plan", the "Intend to Publish version of the draft London Plan" and "emerging London Plan" (see Page 28) as well as to the "London Plan 2016" (Page 15). Paragraph 1.5 of the SpNP should be modified to include the adoption date for the London Plan (2 March 2021) and for Tower Hamlets Local Plan, and all subsequent references to the London Plan should be updated, as in **PM1**. This modification is necessary having regard for national planning policy.
- 4.5 The SpNP is a business neighbourhood plan which has been prepared in accordance with national planning law and regulations, for the area illustrated on Figure 1.1. Chapter 1 also describes the content of the Plan's four appendices, on which I comment later, and concludes with a commitment by the Forum to monitor the Plan's future effectiveness and delivery and undertake periodic reviews. Overall, I consider that Chapter 1 provides a clear and concise introduction to the SpNP, setting out the Plan purpose, and meeting the Basic Conditions.
- 4.6 Chapter 2: Local Context provides a short account of Spitalfields' fascinating and unique history, observing that "On every street, there are layers of history". A brief account of Spitalfields today is followed by a longer account of current pressures and challenges, identified through the consultation exercise. The section begins with reference to "intense pressure in recent years as an employment centre", reflecting the success and growth of the City of London. Whilst there are significant benefits from this growth, the area's character is perceived to be threatened by business over-development. Pressures on space have created concerns over affordability for small businesses, and on housing costs for local residents. Lack of public open space and heavy traffic, which result in poor air quality and noise, notably on Commercial Street, are significant environmental problems in Spitalfields. Three major social areas of

concern were identified from the consultation process: the need for affordable housing in Spitalfields, problems with litter and refuse collection, and anti-social behaviour. I consider that this overview of local concerns and challenges provides useful information for readers and prospective developers. Its recognition should provide a useful first step for plan-making which contributes to the achievement of sustainable development.

- 4.7 Chapter 2 then moves on to describe some aspects of the London and Tower Hamlets Borough planning policy context, confirming that Spitalfields includes four designated conservation areas, many listed heritage assets and is mostly an Archaeological Priority Area. This chapter points out that the western edge of the Neighbourhood Plan Area is within the City Fringe zone which should nurture the employment, business and creative potential of the digital-creative sector, according to the London Plan. A modification is necessary to clarify that the whole of the Neighbourhood Plan Area is within the City Fringe Opportunity Area. The area west of Commercial Street is within the Central Activities Zone (CAZ), where the London Plan supports the provision of employment floorspace. Brick Lane is designated as a district centre in Tower Hamlets Local Plan, and there are several active street markets referenced in Tower Hamlets High Streets and Town Centres Strategy 2017-22, as well as privately run markets. Parts of Spitalfields are within the protected views of St Paul's Cathedral and Tower of London, as set out in The London View Management Framework, and the view from Grade 1 listed Christ Church along Brushfield Street towards Fournier Street is designated for protection by the London Borough of Tower Hamlets. I consider that this section of the SpNP is in general conformity with strategic policies in the Development Plan for the area, and these references to policies in the London Plan and Tower Hamlets Local Plan should help prospective developers to put forward schemes which are locally appropriate and contribute to the achievement of sustainable development.
- 4.8 Page 41 of the SpNP comprises a "Policies Map", which is very similar to Figure 5.2, as both show the proposed local green spaces. Figure 5.3 as well as the "Policies Map" show the Ram and Magpie Site. Green Grid (SPITAL4) is the only additional feature on the map on Page 41, and I note that it illustrates a network that extends outside the Spitalfields Neighbourhood Area (albeit it is clear that the Plan's policies apply only within the designated Area). Paragraph 5.5 of the Plan explains that the Green Grid is an integrated network where walking across Tower Hamlets is encouraged. The supporting text to Policy D.OWS3 of the Tower Hamlets Local Plan refers to Tower Hamlets Green Grid Strategy (2017) and to the Mayor of London's All London Green Grid SPG<sup>6</sup> (2012). It seems to me that the Green Grid network is one of a number of features from the Tower Hamlets Local Plan and the London Plan with significant

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<sup>6</sup> Supplementary Planning Guidance.

implications for future development in Spitalfields, which could usefully be illustrated in the SpNP.

- 4.9 Having regard for paragraphs 2.20-2.24, Planning Context, I propose that the Policies Map on Page 41 is replaced with a new map which shows, for the Spitalfields Neighbourhood Area, key aspects of the wider planning context: Green Grid, the four Conservation Areas, City Fringe zone (showing the whole Neighbourhood Plan Area lies within the zone, as noted in paragraph 4.7 above), CAZ, Brick Lane District Centre and protected views as described in paragraph 2.21. This new map should be referenced in paragraphs 2.20, 4.5 and 5.5 of the Plan, as explained in **PM3**. The modification is needed to provide information for prospective developers and readers of the Plan as to the higher level, strategic policy context, separate from the SpNP policies.
- 4.10 The Vision for the SpNP is described at the beginning of Chapter 3. It begins by stating that it seeks to conserve and improve all the ingredients that come together to make a distinctive and attractive neighbourhood. It refers to the delicate balance between large or small, corporate or creative businesses; between local residents and local, national or international visitors. It aims to ease the many pressures of inner city living, among other things. The Vision is a sophisticated and multi-faceted statement which, in my opinion, is wholly appropriate for Spitalfields, and a good starting point for plan-making.
- 4.11 Three objectives are then defined, under the headings of Environment, Urban Heritage and Business Mix. I consider that the objectives satisfactorily reflect the Plan's Vision and provide suitable starting-points for policy development for Spitalfields. Paragraph 3.1 makes clear that the objectives were identified following extensive consultation with local people and parties. Paragraph 3.9 is headed "Broader Objectives", stating that the Forum wants the Plan to help improve communications between key stakeholders and groups in the area, and enhance dialogue with the local authority and neighbouring wards and boroughs. Chapter 3 has regard for national planning policy on neighbourhood planning, in my view, notably for paragraphs 28-29 of the NPPF.
- 4.12 Chapter 4: Urban Heritage, Chapter 5: Open Spaces and Environment and Chapter 6: Commercial Mix include policies for future development under these three main headings, with reasoned justifications in supporting text and relevant maps and other illustrations. I comment on each of the policies in detail below but am satisfied with the structure and general content of these chapters. Chapter 7: Community Infrastructure Levy Priorities advises that the heritage and greening projects listed in Tables 4.1 and 5.1 should help deliver the objectives of the SpNP and should be eligible for Community Infrastructure Levy (CIL) funding. I consider that, overall, chapters 4-7 provide clear policies and supporting measures, which should contribute to the achievement of sustainable development in Spitalfields.

- 4.13 The Plan includes four lengthy appendices, and the London Borough of Tower Hamlets queried whether Appendices C and D should be removed from the SpNP, and provided as part of a suite of companion documents alongside the rest of the evidence base. Paragraph 1.9 explains that Appendix A: Local Character Area Appraisals and B: Non-Designated Heritage Assets should be read alongside Policy SPITAL1. However, paragraph 1.10 states that Appendix C is part of the evidence base and Appendix D: Assets of Historical Interest is for information only. I agree with the Council that these Appendices (C and D) should be removed from the Plan, and modifications made to the text in paragraphs 1.10, 4.13, 4.24 and 5.16, as set out in **PM2**. Also, Appendix A-paragraph A5, should refer to Appendix B rather than D. PM2 is necessary so that regard is had for national policy, notably for paragraph 31 of the NPPF.
- 4.14 As long as the above modifications are made, I conclude that the Plan as a whole would be in general compliance with the Basic Conditions.

#### *Specific Issues of Compliance of the Plan Policies*

- 4.15 Policy SPITAL1: Protecting the Physical Fabric of Spitalfields is preceded by useful and informative text about Spitalfields' Urban Heritage. Paragraph 4.2 already refers to the NPPF, and I consider that this should be extended to include a reference to paragraph 184 on Conserving and enhancing the historic environment. This paragraph explains that heritage assets range from sites and buildings of local historic value to those of the highest internationally recognised value, such as World Heritage Sites. Assets should be conserved in a manner appropriate to their significance (my underlining). In view of the large number and variety of assets in Spitalfields, I consider that their relative status should be made clear. This reinforces my opinion that the designated conservation areas, as well as the recently defined character areas, should be shown on maps within the SpNP. In addition, Paragraph 4.3 should be modified to explain that listed buildings, Scheduled Ancient Monuments, Areas of Archaeological Priority and conservation areas have higher levels of protection, than locally listed buildings. This does not mean that local heritage should be neglected, especially as it is made clear in paragraph 4.8 of the SpNP that local people are strongly in favour of conserving and enhancing their rich urban fabric. However, Policy SPITAL1, as well as 4.2-4.3, should be modified, as shown in **PM6** and **PM4**, so that the commitment to secure high quality of design in all new development is maintained, but the hierarchy of heritage assets' significance, which will be influential in decision-making, is recognised. This is necessary having regard for national policy.
- 4.16 Historic England advised that a number of designated heritage assets within the Spitalfields area are included in the 2019 Heritage at Risk register, published by Historic England and based on information provided by the London Borough of Tower Hamlets. I agree that the issue should be mentioned in Policy SPITAL1, and a commitment made to promoting opportunities to address such risks. **PM5** and **PM6** should be made to



modify the policy and add new text to the section - Protecting the physical fabric of Spitalfields - on Pages 17-18, having regard for national planning policy. The assets at risk include Wentworth Street Conservation Area, and the Forum agreed, in its letter to me of 6 April 2021, to expand Appendix 1 and list the at-risk assets within the respective Local Character Areas. Appendix A should be modified as in **PM11** accordingly, having regard for national planning policy.

- 4.17 Historic England also requested that the assessment process for heritage significance and townscape qualities of non-designated heritage assets, shown in Appendix B, be defined more clearly. In its letter to me of 6 April 2021, the Forum provided additional information which I recommend be added to paragraph 4.22 and Appendix B. **PM5** and **PM12** should be made to clarify the assessment process for inclusion in Appendix B and have regard for paragraph 197 of the NPPF. The Forum also provided a map of landmark and townscape views, identified as part of the survey of local heritage assets. I recommend that this map with suitable numbering and cross-references to Appendix A be added to the SpNP, as in **PM6**.
- 4.18 Figure 4.1: Spitalfields Character Areas and Appendix A – Local Character Area Appraisals are based on in-depth assessments of Spitalfields, with its varied and complex built environment. I consider these assessments to be of the highest quality and anticipate that they will greatly assist decision-making on development proposals in the near future. As long as **PM4, PM5, PM6, PM11 & PM12** are made, Policy SPITAL1 will meet the Basic Conditions for neighbourhood planning.
- 4.19 Policy SPITAL2: Land use, activities and frontages seeks to maintain the mix of business, leisure and residential uses which, as I saw at my site visit, exist side by side. Attractive street frontages and signage are sought and the policy refers to the Character Areas, as described in Appendix A. I note that the new Use Class E is referenced and consider that the policy should provide appropriate protection and enhancement for the full range of land uses and activities across Spitalfields. Policy SPITAL2 meets the Basic Conditions for neighbourhood planning.
- 4.20 Policy SPITAL3: Public Realm follows SPITAL2 logically, in my opinion, in that it seeks to safeguard the existing layout of streets, alleyways and passages, retain historic features where feasible, and create new or improved areas of public realm where practical and viable. Transport for London (TfL) commented, at the Regulation 16 consultation stage, that it wished to see more references in the SpNP to improved connectivity, car free development, Vision Zero, expansion of cycle hire and better management of deliveries and servicing. The Plan, it is suggested, should give clearer endorsement of the Healthy Streets approach. As TfL observed, transport and movement is not one of the main concerns which the SpNP seeks to address. However, I agree with TfL that the inclusion of policies or projects to reduce the negative impact of vehicles and encourage sustainable travel could enhance the public realm and complement policies to protect the built heritage, the environment and

open space. I propose that Policy SPITAL3 is modified to commit to the Healthy Streets approach, with additional text in paragraphs 4.32 to 4.36, as set out in **PM7**, so that the Plan is in general conformity with the London Plan and Tower Hamlets Local Plan, and will contribute to the achievement of sustainable development.

- 4.21 I support the inclusion in the Plan of Table 4.1: Priority heritage projects to be funded and delivered and note that these are projects for which CIL funding could be used. The London Borough of Tower Hamlets queried the reference in point 6 to outdoor public seating, designed to prevent people sleeping on them. It commented that this form of design is often referred to as “hostile architecture” or “exclusionary design” which aims to restrict the range of behaviours, and people, in public spaces. However, the London Borough of Tower Hamlets advised that these measures do nothing to address the rough sleeping which takes place within London, only punishing those experiencing homelessness and pushing the problem into other areas. The Forum agreed that Table 4.1(6) should be modified and I propose, in **PM7**, that the last sentence is removed, in order that the Plan will contribute to the achievement of sustainable development.
- 4.22 Policy SPITAL4: Facilitating urban greening is preceded by text which points out that large parts of Spitalfields have a significant deficiency of open space. Policy S.OWS1 of the Tower Hamlets Local Plan identifies the Spitalfields and Banglatown Ward as an area where connectivity to open spaces should be improved. The Green Grid, to promote trees and vegetation along routes where people can walk and cycle more, extends across Spitalfields and the rest of the London Borough of Tower Hamlets, as illustrated on Figure 5.1 and the Policies Map (on Page 41 and to be modified by PM3). Clause A of Policy SPITAL4, to maximise urban greening where reasonable and practicable, is in general conformity with the strategic Local Plan, in my view, as is clause C, to enhance the quality and accessibility of the Green Grid network.
- 4.23 Clause B seeks Urban Green Factors (UGF) of 0.4 from all major residential development, and of at least 0.3 from major B1 commercial schemes, where possible. As the London Borough of Tower Hamlets observed, recent changes to the Use Classes Order mean that the reference to Class B1 has been subsumed in the new Class E. This should be recognised in the policy. I also agree that the Plan should clarify that the UGF calculation should be based on the factors specified in the London Plan Policy G5. As long as the modifications, set out in **PM8**, are made, Policy SPITAL4 and the supporting text will be in general conformity with the strategic London Plan and Tower Hamlets Local Plan, and should contribute to the achievement of sustainable development.
- 4.24 Policy SPITAL5: Local Green Spaces identifies five areas, which are illustrated on Figure 5.2. The Consultation Statement indicates that all landowners were informed of the proposed local green space designations, and no objections were made. From my site visit and having regard for the criteria in paragraph 100 of the NPPF, I am satisfied that all five areas



should be designated as local green spaces. All provide welcome areas of accessible open space in an area that is intensively developed, and where green infrastructure is limited. All five spaces should facilitate outdoor mixing, sport and leisure activity and contribute to the social wellbeing of local residents and workers, as well as being capable of enduring beyond the end of the Plan period. Appendix C provides detailed maps and evidence for each area which justifies their designation. However, I consider that Appendix C should be removed from the SpNP as it is evidence rather than policy, and paragraph 5.16 should be modified to make this clear. The London Borough of Tower Hamlets proposed a modification to clause B of the policy, to clarify that decisions on planning applications should be taken in accordance with national policy for Green Belts. I support this modification having regard for national planning policy. **PM9** should be made so that Policy SPITAL5 and its supporting text meet the Basic Conditions.

- 4.25 I support Policy SPITAL6: Ram and Magpie Site, and the aims to green the space, facilitate the activities of the City Farm and remove anti-social behaviour. In addition, I welcome the inclusion of Table 5.1: Priority urban greening projects, which indicates that the Forum is intent on delivering its policies for open spaces and the environment.
- 4.26 Chapter 6 is titled Commercial Mix, and the supporting text explains that small and micro-businesses are the life-blood of the Tower Hamlets economy. Over 95% of the Borough's businesses are defined as small, employing fewer than 50 people. Spitalfields includes more than 300 such business employers. Industrial floorspace in the Borough declined by 43% between 2000 and 2012, with employment increasingly being focused in the service, retail and light industrial sectors. Large corporate businesses are spreading out from the traditional City of London to places like Spitalfields in the City Fringe. The Fruit and Wool Exchange used to contain 100 small businesses but was redeveloped and is now occupied by a single corporate occupier. Rising rents are seen as a main problem for local small employers. The Tower Hamlets Employment Land Review for the Local Plan estimated that the new Crossrail station at Whitechapel would be likely to increase the pressure on small, local businesses. It recommended action to protect them.
- 4.27 In spite of recent pressures, Spitalfields still has a diverse commercial sector, reflecting its cultural history and successive groups of immigrants. Brick Lane accommodates fashion, art, entertainment, retail and start-up businesses, as well as restaurants and cafes. The Truman Brewery site now contains cultural venues, art galleries, restaurants, nightclubs, start-up spaces and shops. Clothing shops, warehouses, art galleries, museums, health centres and educational buildings are scattered through the area. The Spitalfields Commonplace Outreach Report 2018/19 revealed the overwhelming concern across the business community about rising rents, which are seen to be pricing some businesses out of the area. Research by the East End Trades Guild provided evidence for this perception.

- 4.28 Policy SPITAL7: Affordable Workspace in the SpNP seeks to address the problem of rising rents and ensure that major commercial or mixed-use development schemes provide at least 10% of new employment floorspace as affordable. "Affordable" is defined as at least 45% below the Neighbourhood Area's indicative market rate; affordable workspace should be provided for a minimum of 12 years, subject to viability. The SpNP justifies its approach with reference to Policy D.EMP2 of the Tower Hamlets Local Plan, which indicates that at least 10% of new employment floorspace should be provided as affordable workspace (to meet the needs of more local businesses and start-ups). This workspace should be let at affordable tenancy rates at least 10% below the indicative rate for the location, for not less than 10 years. As Policy D.EMP2 refers to "at least 10%" being affordable for "not less than 10 years", I consider the targets of "at least 45%" and "a minimum of 12 years" to be in general conformity with the strategic Local Plan.
- 4.29 The key question is viability, and paragraph 6.10 of the SpNP refers to the Tower Hamlets Affordable Workspace Evidence Base, Peter Brett Associates (PBA), 2016, which found that some schemes could support a 40-50% discount in rental rates on 10% of new floorspace, without becoming unviable. A study by BNP Paribas Real Estate (BNP) 2018, for the London Borough of Hackney relating to the Shoreditch Priority Office Area, which is near to Spitalfields, is also referenced in paragraph 6.10. Although a large number of respondents to the Regulation 16 consultation exercise expressed support for Policy SPITAL7, it was opposed by Mr Zeloof on the basis that it would not be viable in Spitalfields. I asked the Forum in March 2021 for a response to this representation. Mr Zeloof raised important matters of concern about Policy SPITAL7, in brief:
- A 45% discount on affordable housing would result in the majority of schemes being unviable;
  - The requirement for at least 10% of new employment workspace to be affordable workspace, as expected in the Tower Hamlets Local Plan, would not be viable in many cases in Spitalfields; and
  - The COVID-19 epidemic could have a long term, negative impact on the commercial workspace market.
- 4.30 Mr Zeloof's representation was accompanied by a report from DS2 LLP, who had undertaken a review of the SpNP evidence base to determine whether the affordable workspace policy would be viable, and therefore deliverable. DS2 pointed out that the BNP study had tested four major strategic development sites, significantly larger than any which had come forward in Spitalfields. Also, the sites in Shoreditch included a high proportion of residential development, which would be unlikely to come forward in Spitalfields; it was unclear whether residential development had cross-subsidised the affordable workspaces. DS2 described a "fundamental flaw" that both the PBA and BNP reports were borough-wide studies which had been applied in the SpNP to the localised area of Spitalfields, without considering whether the specific type, scale and height of new development that will come forward locally would be comparable to the wider area.

- 4.31 DS2 carried out its own more localised study, based on recent development sites in Spitalfields, recognising that there will be restrictions on height and massing in this area, much of which is located in conservation areas. The DS2 assessment used recent, local information on office values, residential values and construction costs. Another key difference in assumptions between the localised assessment and Tower Hamlets Local Plan assessment is the underlying value of the existing employment stock. DS2 adopted higher assumptions for the benchmark land value assessments based on its review of previously developed sites in the area and its assessment of the value of existing employment stock. DS2 concluded that the majority of development scenarios would be unviable when providing affordable workspace at a 45% discount. There is no merit, it was argued, in setting policy at an unachievable level, as it would lead to less new workspace being created. The impact of COVID-19 over the longer term future needed to be considered, and DS2 suggested that negative impacts on the commercial workspace market could be expected.
- 4.32 Policy SPITAL7 is applicable only to major development, as defined in the NPPF. For *“non-residential development it means additional floorspace of 1,000 m2 or more, or a site of 1 hectare or more.....”* (NPPF Glossary). On these grounds, the sites assessed by DS2 for Mr Zeloof would not be subject to the policy, as the largest one, London Fruit & Wool Exchange is cited as 0.84 hectares. In response to my questions, the Forum stated on 6 April 2021 *“A key theme which emerged during our consultations with the public and our analysis of the local area is that the commercial character of Spitalfields is typified by smaller scale, diverse, independent businesses and workspaces. The reason that Policy SPITAL7 only addresses major development is to avoid Spitalfields becoming a location for large scale commercial development which is targeted at attracting large, international single occupiers”*. Such developments would, in my view, conflict with the existing character of the area, and reduce opportunities for small and start-up businesses.
- 4.33 I agree with the Forum that it is currently impossible to know with certainty what the commercial market will look like in the long term post COVID-19. Land value is a key factor in assessing viability, and the DS2 report shows benchmark land values covering a wide range from £14.3 to £137.5 million per hectare. I agree with the Forum that these figures illustrate there can be substantially different opinion on site value, and hence on calculations of viability. Policy SPITAL7 seeks provision of affordable workspace, subject to viability based on an open-book viability appraisal. This approach provides flexibility where there is an evidence-based reason to depart from the policy’s expectations, and it should enable developers to promote appropriate and deliverable schemes for specific sites. Subject to a minor clarification to the supporting text in paragraph 6.12, put forward by the Council and recommended in **PM10**, I am satisfied that Policy SPITAL7 is in general conformity with Tower Hamlets Local Plan and should contribute to the achievement of sustainable development.

- 4.34 I have had regard for Thames Water’s request that the SpNP should alert developers to the need to consider water and waste water infrastructure when preparing development proposals, especially as changes took effect in 2018 with a new charging schedule. Thames Water states that developers should be referred to the agency’s pre-planning service. The Forum indicated that, as the Plan had not addressed matters relating to water, and as problems had not been raised by the local community, it did not consider that additional wording was needed. I note that section 25 - Infrastructure Delivery - of the Tower Hamlets Local Plan refers readers to the Borough’s Infrastructure Delivery Plan, and that the SpNP is not putting forward any major development schemes. Therefore, I agree with the Forum that the Plan need not be modified to provide additional information on water and waste water infrastructure.
- 4.35 Providing the proposed modifications described above are made, I conclude that Policies SPITAL1 to SPITAL7 inclusive meet the Basic Conditions for neighbourhood planning.

## **5. Conclusions**

### *Summary*

- 5.1 The SpNP has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it, as well as the responses from the Neighbourhood Planning Forum in April 2021 to my preliminary questions.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendums.

### *The Referendums and Neighbourhood Planning Area*

- 5.3 I have considered whether or not the referendums area should be extended beyond the designated area to which the Plan relates. The SpNP, as modified, has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendums to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendums on the Plan should be the boundary of the designated Neighbourhood Plan Area.

### *Overview*

- 5.4 It has been a privilege to examine the Spitalfields Neighbourhood Plan which relates to a unique, vital and dynamic area, with a fascinating

history and wide range of cultural influences. The Spitalfields Neighbourhood Forum and related agencies have been working hard to produce a Neighbourhood Plan for their area, over many years since 2013. I have been highly impressed by the amount and quality of work undertaken to establish a sound evidence base for plan-making. In particular, the Character Area Appraisals and description of Non-Designated Heritage Assets, which comprise Appendices A and B of the SpNP, are very special in terms of their level of detail and professional scrutiny. I also consider that the measures taken by the Forum to consult and engage with the local population, business and stakeholder interests, and workers in Spitalfields, have been exemplary. I commend the Forum for its work to involve the hard-to-reach social groups in neighbourhood planning for Spitalfields. The SpNP, with modifications, should provide a useful addition to the Development Plan for the area, and assist those with responsibility in the London Borough of Tower Hamlets and Greater London Authority for making decisions on planning applications.

*Jill Kingaby*

Examiner

## Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 4 and onwards	<p>Policy context</p> <p>1.5 The Neighbourhood Plan .....Tower Hamlets Local Plan <b>2020</b> and the London Plan <b>2021</b>.....</p> <p>4.5 There is a strong existing policy framework .....</p> <ul style="list-style-type: none"> <li>• <del>The Intend to Publish</del> version of the London Plan (<del>2019</del> <b>approved for adoption by the Minister for Housing, Communities &amp; Local Government in 2021</b>).</li> <li>• <del>London wide policies contained within the London Plan 2016</del></li> </ul> <p>5.9 The <del>draft</del> London Plan .... target in a lower tier plan, <del>draft</del> London Plan Policy G5 .....</p> <p>5.10 The Urban Greening Factor ....<del>emerging</del> London Plan ....</p> <p>Footnote 6 See '<del>Intend to Publish</del>' version of the <del>draft</del> London Plan, pp 322-325 ...</p> <p>5.12 It is therefore considered..... The <del>draft</del> London Plan .....as a minimum, using the <del>draft</del> London Plan's working UGF ....</p> <p>Commercial Mix – Page 37</p> <p>Footnote 8. Source: Tower Hamlets Local Plan <del>2019</del><b>2020</b></p>
PM2	Page 6 and onwards	<p>1.9 The Neighbourhood Plan has <del>a number of</del> <b>two</b> appendices, with <del>two of these</del> – Appendix A .....</p> <p>Delete paragraph 1.10</p> <p>4.13 In order to gather ....inspections. <del>Appendices</del><b>Appendix</b> B and <del>the</del> <b>evidence base document 'Assets of</b></p>

		<p><b>Historical Interest'</b> are the result of this work.</p> <p>4.24 A list of 'assets of historical interest' are <del>is</del> provided in Appendix <del>D</del> <b>the evidence document described in paragraph 4.13 above.</b></p> <p>5.16 Detailed maps and information about each space are <del>shown in Appendix C. D</del> <b>including</b> details of how each area .....</p> <p><b>Appendix A Local Character Area Appraisals</b></p> <p>A5 The Local Character Area ..... recorded in Appendix <del>D</del> <b>B.</b></p>
PM3	Page 10, 15, 27 & 41	<p><b>Planning context</b></p> <p>2.20 Delete the text in the second bullet point and replace with: <b><i>The Spitalfields Neighbourhood Area is part of the Tech City cluster in the City Fringe Opportunity Area given special status in the London Plan. "In the City Fringe, the Tech City cluster should be supported as one of London's nationally-significant office locations and complemented by Development Plan policies to enable entrepreneurs to locate and expand there and to provide the flexibility and range of space that this sector needs, including affordable space" (London Plan 2021, para 6.8.3).</i></b></p> <p>Insert a new map entitled Planning Context, to illustrate where in Spitalfields significant policies from the London Plan 2021 and Tower Hamlets Local Plan 2020 will have an impact, including:</p> <ul style="list-style-type: none"> <li>• Designated conservation areas</li> <li>• Grade 1 listed Christ Church</li> <li>• City Fringe zone</li> <li>• CAZ</li> <li>• Brick Lane District Centre</li> <li>• St Mary Spital Scheduled Monument</li> <li>• Archaeological Priority Area</li> </ul>



		<ul style="list-style-type: none"> <li>• Green Grid (SPITAL4)</li> </ul> <p>Delete 8 POLICIES MAP on Page 41</p> <p>4.5 Add a new sentence at the end of the paragraph: <b>Figure xx Planning Context shows the locations and boundaries of a number of these features.</b></p> <p>5.5 The Green Grid, <b>as shown in Figure 5.1 Open spaces in the western Tower Hamlets area, by type, and in Figure xx Planning Context</b>, is defined as .....</p>
PM4	Page 15	<p>4.2 Spitalfields is an area .....is very high. <b>Paragraph 184 of the National Planning Policy Framework explains that the significance of heritage assets can vary from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised.</b></p> <p>4.3 <b>Spitalfields has many heritage assets identified as being of national significance.</b> This is already recognised by the statutory listing of a <b>A</b> great many buildings within the area <b>have statutory listing</b>,-some at the highest level ....Grade II*, and by the designation of <b>some sites have been designated as</b> Scheduled Ancient ..... Wentworth Street. There are also a number of locally listed buildings, <b>which the Plan seeks to protect although their preservation carries less weight than for listed buildings.</b></p>
PM5	Page 18	<p>4.22 Whilst across the Neighbourhood .....make a positive contribution. <b>A comprehensive survey was carried out in April/May 2020. Every street, building or structure visible from the public realm was visually inspected, and assessed in terms of:</b></p> <ul style="list-style-type: none"> <li>• <b>Age and condition</b></li> <li>• <b>Architectural design</b></li> <li>• <b>Historic fabric</b></li> </ul>



		<ul style="list-style-type: none"> <li>• <b>Quality of materials and workmanship</b></li> <li>• <b>Use and function</b></li> <li>• <b>Historical association</b></li> <li>• <b>Social history, and</b></li> <li>• <b>Townscape importance.</b></li> </ul> <p><b>The most important 40 historic assets based on the above criteria were selected for inclusion in Appendix B: Non-Designated Heritage Assets.</b></p> <p>Insert a new paragraph between the existing paragraphs 4.23 and 4.24:</p> <p><b>Historic England, with information provided by local authorities, maintains a register of Heritage at Risk. In 2019, Wentworth Street Conservation Area and a number of other designated assets within the Spitalfields area were included, as shown in Appendix A. The NPPF requires local planning authorities to follow a positive strategy for the historic environment and to target heritage assets at most risk from neglect and decay. The Forum will work with the London Borough of Tower Hamlets to identify assets at risk and promote opportunities to address risk either through refurbishment or enhancement of settings.</b></p>
PM6	Page 21	<p><b>POLICY SPITAL1: PROTECTING THE PHYSICAL FABRIC OF SPITALFIELDS</b></p> <p>A. All developments ...</p> <p>B. All applications <b>for development within conservation areas, identified in Figure xx</b>, should demonstrate how the proposal addresses... other heritage assets <b>that they would not have a harmful impact on the character or appearance of the area. Development proposals should not have a negative impact on listed buildings or other</b></p>

		<p><b>designated heritage assets, or their settings.</b></p> <p>C. All applications .....</p> <p><b>D. All applications for development should take account of their impact on the Local Character Areas identified in Figure 4.1 and Appendix A, within which the application site sits or adjacent to it.</b> New development should interact and interface .....</p> <p>G. Development should have regard ...Character Area Appraisal, <b>and shown on Figure .....</b></p> <p><b>K. New development which would prevent or reverse the neglect and decline of heritage assets defined as at risk by English Heritage, or enhance their settings, will be supported.</b></p> <p>Insert a new map following Policy SPITAL1 entitled Significant Views within the Spitalfields Area, with a numbering system for the viewpoints that enables cross-reference to Appendix A: Local Character Area Appraisals.</p> <p>Add a footnote to the map stating:</p> <p><b>The significant views include (1) views already identified as important in the existing adopted Conservation Area Management Guidelines; and (2) additional views considered important because they give views of a specific identified landmark eg. the spire of Christ Church or the Old Truman Brewery chimney, or because they offer good general street and townscape views.</b></p>
PM7	Pages 23 and 24	<p>Public realm</p> <p>At the end of paragraph 4.32, insert a new paragraph as follows:</p> <p><b>The London Plan 2021 (Chapter 10) seeks a shift from car use to more</b></p>

	<p><b>space-efficient travel. It aims to secure a rebalance towards walking, cycling and public transport use and also to minimise freight trips on the road network. Policy T1 of the London Plan aims for 80% of all London trips to be made by these sustainable modes by 2041. Policy T2 – Healthy Streets expects development plans to promote and demonstrate the application of the Mayor’s Healthy Streets approach. Section 16 of Tower Hamlets Local Plan also aims for a more efficient and connected transport network with reduced need to travel and incentives for modal shift towards cycling, walking and public transport usage. This Healthy Streets approach in Spitalfields should contribute to visual improvements to the streetscene, better air quality, and a safer and cleaner environment. These outcomes are consistent with the underlying aim of Policy SPITAL3, to preserve and enhance the historic public realm of the area.</b></p> <p>4.33 Historic surfacing materials ....</p> <p>4.36 These policies are supported by 16 <b>17</b> Local Character Area appraisals .....</p> <p><b>POLICY SPITAL3: PUBLIC REALM</b></p> <p>A. The existing layout ....be retained.</p> <p><b>B. Where new development takes place, street space for walking, cycling and leisure purposes will be maximised. Public transport routes will be protected and enhanced where necessary. Freight trips on the road network will be minimised where possible, and managed to promote safe, clean and efficient freight functions.</b></p> <p>B-C. Existing historic paving .....</p>
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		<p>(Modify points C., D., and E. So that they read as <b>D. E.</b> and <b>F.</b>)</p> <p><b>Table 4.1 Priority heritage projects</b></p> <p>No. 6 Provide Outdoor Public Seating on main shopping and market streets</p> <p>In suitable locations ....<del>The seats should be designed to prevent people sleeping on them.</del></p>
PM8	Pages 28 and 29	<p><b>Urban Greening Factor</b></p> <p>5.9 The <del>draft</del> London Plan <b>2021</b> has devised ..... lower tier plan, <del>draft</del> London Plan <b>2021</b> Policy G5 .... 0.3 for predominantly <del>B1</del> commercial development (<del>offices and light industrial</del> <b>excluding B2 and B8 uses</b>).</p> <p>5.10 The Urban.... <del>emerging</del> London Plan</p> <p>5.12 It is therefore considered ...The <del>draft</del> London Plan .....<del>draft</del> London Plan's working UGF is justified. ....</p> <p><b>POLICY SPITAL4: FACILITATING URBAN GREENING</b></p> <p>B. All major residential .....0.4 and all major <del>Class B1</del> commercial schemes (<b>excluding B2 and B8 uses</b>) a UGF score of at least 0.3, <b>based on the factors set out in London Plan Policy G5.....</b></p>
PM9	30	<p><b>Local Green Spaces</b></p> <p>5.16 Detailed maps and information about each space are <del>shown in Appendix C.</del> <del>Details of</del> <b>including</b> how each area...</p> <p><b>POLICY SPITAL5: Local Green Spaces</b></p> <p>B. <del>Local policy for managing</del> <b>Decisions on planning applications for</b> development on a Local Green Space ...</p>
PM10	Page 39	<p>6.12 The affordable workspace ..... in association with a provider, <b>whether chosen from an approved list prepared by the Council or otherwise</b> <del>not</del></p>

		included on an approved list, provided the terms can be agreed with the Council....
PM11	Page 42	<p><b>Appendix A LOCAL CHARACTER AREA APPRAISALS</b></p> <p>At-risk heritage assets, as defined by Historic England's Heritage at Risk Register, should be shown in a list, and identified for each Local Character Area.</p>
PM12	Page 73	<p><b>Appendix B NON-DESIGNATED HERITAGE ASSETS</b></p> <p>Add new introductory text as follows:</p> <p><b><i>Dan Cruickshank and Alec Forshaw were commissioned by the Spitalfields Neighbourhood Forum to carry out a comprehensive survey of the neighbourhood area in April/May 2020. Every street, building or structure visible from the public realm was visually inspected, and assessed in terms of:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>Age and condition</i></b></li> <li>• <b><i>Architectural design</i></b></li> <li>• <b><i>Historic fabric</i></b></li> <li>• <b><i>Quality of materials and workmanship</i></b></li> <li>• <b><i>Use and function</i></b></li> <li>• <b><i>Historical association</i></b></li> <li>• <b><i>Social history, and</i></b></li> <li>• <b><i>Townscape importance.</i></b></li> </ul> <p><b><i>Reference was made to The Buildings of England: London Volume 5: East, The survey of London and Spitalfields (Dan Cruickshank 2020).</i></b></p> <p><b><i>The most important 40 historic assets based on the above criteria were selected for inclusion in this Appendix B: Non-Designated Heritage Assets. The remaining items are included in the evidence base document, List of Assets of Historic Importance.</i></b></p>