

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 line 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

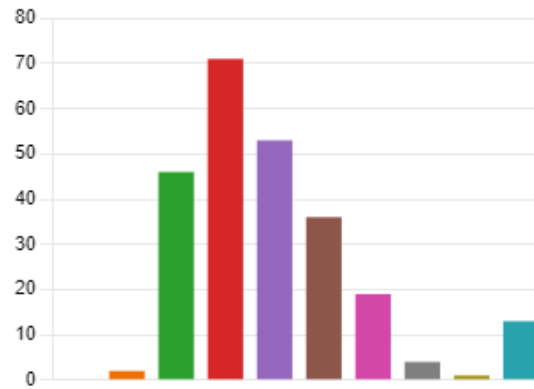
- 136 written responses received from statutory consultees, developers, landowners and community groups

4.23 The graphs below provide demographic information regarding respondents to the online survey:

165. Age

[More Details](#)

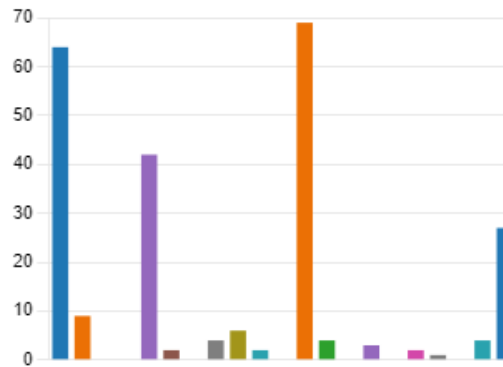
0-15	0
16-24	2
25-34	46
35-44	71
45-54	53
55-64	36
65-74	19
75-84	4
85+	1
Prefer not to say	13



168. How would you describe your ethnic group?

[More Details](#)

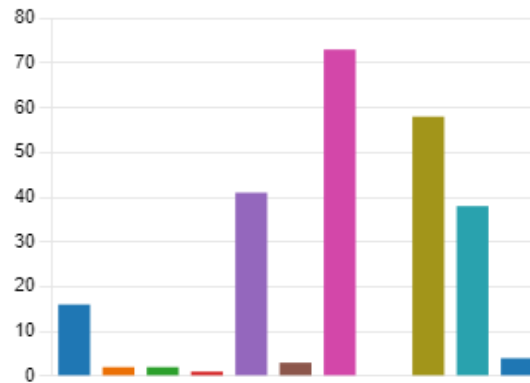
White: British	64
White: Irish	9
White: Traveller of Irish heritage	0
White: Gypsy/Roma	0
Any other White background	42
Mixed: White and Black Caribbe...	2
Mixed: White and Black African	0
Mixed: White and Asian	4
Mixed: Any other mixed backgr...	6
Asian / Asian British: Indian	2
Asian / Asian British: 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](#)

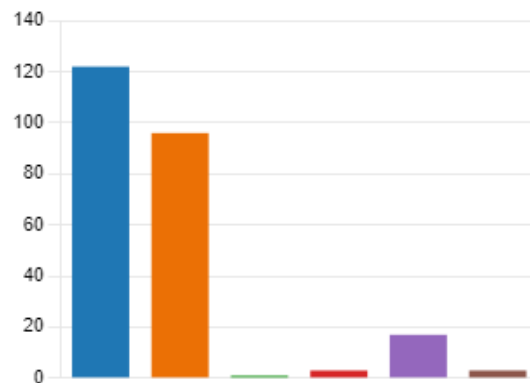
● Agnostic	16
● Buddhist	2
● Hindu	2
● Humanist	1
● Christian	41
● Jewish	3
● Muslim	73
● Sikh	0
● No religion or belief	58
● Prefer not to say	38
● Other	4



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>

	<p>A need for resourcing to ensure construction management plans are reviewed and approved in a timely manner.</p>	<p>Dedicated resources within the Delivery Coordination Team are in place.</p>
<p>DV5 Developer contributions</p>	<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>
CG7 Sustainable Drainage	<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>

<p>CG10 Noise and vibration</p>	<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>
<p>CG11 Contaminated land and storage of hazardous substances</p>	<p>Comment received raising concern that 'Strategy for the Identification of Contaminated Land' is out of date.</p>	<p>Have confirmed with noise and pollution teams that this document is not out of date.</p>

People, Places and Spaces		
Policy	Summary of Comments	How we responded
PS1 Design- and infrastructure-led approach to development	<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>
PS2 Tall buildings	<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 re-providing 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 re-provision 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>

4.11 Westferry Printworks	<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>	Minor change made to reference dock outfall.
4.12 Wood Wharf	<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>	Minor updates to text made, no extra flexibility for student and co-living as these are not considered appropriate for this site.
4.13 10 Bank Street	<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>	Minor updates to text made, no extra flexibility for student and co-living as these are not considered appropriate for this site.
4.14 Hertsmere House	<p>Very few responses received, including no response from the landowner or developer. Canary Wharf Group supported the allocation.</p>	Site allocation deleted due to concerns about deliverability, and low site capacity assessment.
4.15 Samuda Estate	<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>	Site allocation deleted due to concerns about deliverability and suitability.
4.16 Westferry/Park Place	<p>Canary Wharf group proposed some minor changes to wording to correct mistakes, and asked</p>	Minor updates to text made, no extra flexibility for student and co-living as these are not considered appropriate for this site.

	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.