

Central Area Good Growth Supplementary Planning Document

Consultation and Engagement Report

17/05/2021



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Introduction

Background and Context

- 1.1 The Central Area Good Growth SPD provides supplementary guidance on the design of residential developments on small sites that respect and enhance the well-established character of the Central Area. It provides guidance to several policies from the Tower Hamlets Local Plan 2031, in particular policies S.DH1: Delivering High Quality Design, S.H1: Meeting housing needs and D.H3: Housing standards and quality. The SPD also provides supplementary guidance on achieving the vision set out by the Local Plan for the sub-area: Central. Furthermore, the SPD helps to deliver the Mayor's manifesto pledges to improve the quality and fairness of housing and make development work for local people. The SPD responds to the National Planning Policy Framework (NPPF) and new London Plan, and has been prepared and will be adopted in accordance with the provisions in the Town and Country Planning (Local Planning) (England) Regulations 2012.

- 1.2 The Central Area is the only part of the borough that is not an Opportunity Area, but it is still expected to contribute with 14% of the total housing to be delivered in Tower Hamlets, which comes up to 7,597 units. With limited land available for significant redevelopment and only two medium-sized sites allocated in the Tower Hamlets Local Plan 2031, it is expected that the Central Area will go through a gradual intensification through development of small sites, infill development and some piecemeal redevelopment. The importance of unlocking small sites in order to meet local and strategic housing requirements has been increasingly highlighted by regional and national planning policy and guidance. The NPPF considers that smaller sites can make an important contribution to meeting an area's housing needs, particularly as they are often built-out relatively quickly. The new London Plan highlights under Policy H2 - Small Sites the importance of boroughs pro-actively supporting well-designed new homes on sites below 0.25 hectares. The London Plan also outlines that boroughs should prepare housing design guidelines to proactively encourage increased housing provision through small residential developments.

- 1.3 The project's main objective is to ensure that residential developments on small sites respect and enhance the well-established character of the Central Area. It will also enable stakeholders, such as residents, Members, developers and officers, to better understand the role of design in small-scale housing developments. The document is

divided in two parts: a Character Appraisal of the Central Area and Guidelines for Good Growth that focus on design recommendations for residential developments on small sites.

Role of the Consultation and Engagement Report

1.4 The SPD is subject to statutory preparation procedures under Regulations 11-16 of the Town and Country Planning (Local Development) (England) Regulations 2012.

This Consultation and Engagement Report has been prepared to:

- provide an engagement framework that describes the main consultation methods that have been used;
- summarise the key issues raised by the community and stakeholders, and
- set out the Council's response to representations received, and how they have help shape the SPD.

Consultation and Engagement

Approach

1.5 The approach to consultation was developed in conformity with the Council’s Statement of Community Involvement (SCI) (2019), the Council’s Consultation and Engagement Handbook and in collaboration with the Communications Team. The overarching aim of consultation is to provide an opportunity for involvement from a wide range of local community groups and individuals.

How we involved the community and stakeholders

1.6 There are several distinct stages to consultation and engagement activities to progress SPDs. The table below sets out the stages that applied to the Central Area Good Growth SPD and identifies where and how the community and key stakeholders had the opportunity to get involved.

Table 1 – Central Area Good Growth SPD Consultation Stages

Stage		Purpose of communication	How the stakeholders had their say
Stage 1 – Project scoping	October 2019 - March 2020	This stage focused on agreeing the project vision, scope and methodology.	Internal one-to-one meetings and briefing sessions.
Stage 2 – Evidence-Gathering (Character Analysis)	March - September 2020	This stage focused on producing the Character Appraisal whilst gathering input from Central Area residents, workers, visitors and local community groups about existing character and also ideas on what the specific purposes of the SPD should be to support future design recommendations. An internal workshop was also held with Place-Shaping officers with expertise on heritage and urban design to discuss	For external stakeholders, by writing to us, completing a survey and/or attending the Q&A session. Internal stakeholders were consulted through workshops.

		approaches to studying character.	
Stage 3 – Evidence-Gathering (Existing challenges for small-scale developments)	July - September 2020	This stage focused on understanding the existing challenges to progressing small-scale residential developments through planning to identify on which topics the SPD should focus its design recommendations.	Internal workshops.
Stage 4 – Draft testing	October – November 2020	This stage focused on presenting draft guidelines to internal and external stakeholders to decide on a way forward.	Internal and external workshops, co-design and briefing sessions.
Stage 5 - Statutory Consultation	11 th January – 21 st February 2021	This stage focused on publicising the proposed recommendations and guidance and seeking feedback on them.	By writing to us, completing a survey, adding pins to an interactive map and/or attending a consultation event.
Stage 6 – Adoption of SPD	May – July 2021	This stage focused on disseminating the findings of the Statutory Consultation and deciding on adoption of the guidance and recommendations.	Briefing to members, corporate and directorate leadership teams and briefing sessions with internal teams.

1.7 Throughout the SPD preparation process, consultation techniques and activities were carried out to ensure an effective and efficient engagement. This was particularly important due to the inability to hold in-person events as a result of the COVID-19-related restrictions. Some of the methods employed included:

Meeting with elected members and presenting to Boards

Regular engagement with the Lead Member for Planning and Social Inclusion and wider members to ascertain community priorities and aspirations, to ensure these were reflected in the SPD.

Online survey and Q&A session

An early-stage online survey was conducted through the Let's Talk Tower Hamlets platform to gather ideas and feedback from local communities as the SPD was developed. An online Q&A session was also held to accompany the survey.

Internal working group

Regular meetings with internal officers to inform on the progress of the document and seek feedback. This included officers from Strategic Planning, Development Management, Housing Regeneration and Capital Delivery.

Small sites working group

Regular meetings were held with a working group formed by officers from local authorities across London and the GLA and who are part of the Public Practice network to discuss matters related to housing delivery on small sites such as increasing planning certainty through design recommendations, site identification work and engagement with local communities.

External stakeholder workshops and presentations

Workshops and presentations were held for various external stakeholders such as local architects and developers, the Tower Hamlets Housing Forum (THHF) and Tower Hamlets' Conservation and Design Advisory Panel (CADAP) to gain feedback on objectives and design strategies to meet these.

On-line updates

The Council's website and social media platforms such as Facebook, Twitter and LinkedIn were regularly updated to inform people of the consultation process and progress of the document.

Advert/notices in local newspapers

Adverts were included in the Docklands & East London Advertiser and London Gazette to publicise consultation events.

Flyers and posters

Flyers were sent to every household in the Central Area and posters were put up across the area, including in parks and Idea Stores, to inform residents, workers and visitors of consultation events and activities.

Email and Letters

Those on the Local Plan Consultation database as well as local community groups, tenants' associations, neighbourhood forums and other locally based organisations were contacted to inform them of consultation events and activities

Use of innovative online tools

In order to make online sessions more interactive and collaborative, the open-source online tool Miro was used in workshops. The platform was deemed easy to use by internal and external stakeholders alike. The image below is a screenshot of one of the internal workshops that took place during the SPD's development:

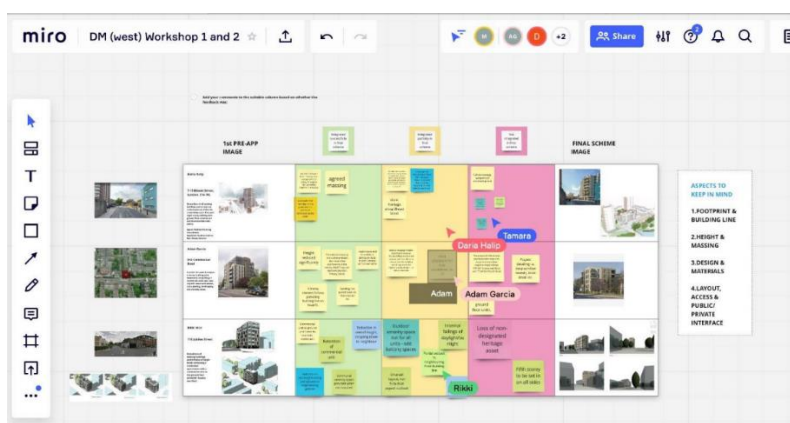


Image 1 – Screenshot of Miro being used for online consultation events

Consultation Programme

Approach

1.8 The consultation activities were broken down into six stages. The sections below outline the role of each stage of the SPD development process as well as key stakeholder groups, methods employed and timeframes for each.

Stage One – Project Scoping

1.9 The purpose of the communication at this stage of the project was to agree the project vision, scope and methodology. One-to-one meetings and briefing sessions were held with the Lead Member for Planning and Social Inclusion as well as officers from Strategic Planning; Development Management; Housing Regeneration; Capital Delivery; Regeneration; Strategy, Policy and Performance. The Project Initiation Document (PID) and a shorter Project Brief were also shared with officers.

Table 2 – Stage 1 Central Area Good Growth SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Internal teams including Strategic Planning; Development Management; Housing Regeneration; Capital Delivery, Strategy, Policy and Performance	Briefing	Briefing note describing the project shared ahead of meeting. One-to-one meeting held including presentation and discussion.	October 2019 – March 2020

<p>Lead Member for Planning and Social Inclusion</p>	<p>Briefing</p>	<p>Briefing note describing the project shared ahead of meeting. One-to-one meeting held.</p>	<p>March 2020</p>
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Stage Two – Evidence-Gathering (Character Analysis)

- 1.10 The purpose of the communication at this stage of the project was to gather input on the Central Area’s existing character. A workshop was held with Place-Shaping officers to discuss approaches to conduct the Character Appraisal and to review early drafts. At this stage we also engaged with Central Area residents, workers visitors, and local community groups to seek their feedback about existing character and to also gather ideas on what the specific purposes of the SPD should be. An online survey was made available on the SPD’s page on Let’s Talk Tower Hamlets alongside a description of the project, objectives and timescales. We also held an online Q&A session.
- 1.11 The survey included a mix of open questions and multiple-choice questions. Responses provided details on what residents felt was special about their neighbourhoods and their opinion about the quality of existing housing, as well as the key topics that they thought the SPD should cover in its design guidelines. Responses to the latter included guidelines on materials, private amenity space, environmental considerations, and quality of internal spaces. These were closely in line with the SPD’s planned scope and approach and the requests to cover environmental considerations was fully taken onboard by the SPD. Moreover, 39.3% of respondents stated that they strongly agreed that new small-scale housing developments can help to improve the overall quality of this neighbourhood as well as providing much-needed homes with another 32.1% saying that they agree with the statement, a positive indication of residents welcoming one of the SPD’s key aspects. The survey included the following topics:

- Which neighbourhood do you live in, work or visit most often in the Central Area?
- In your opinion, what makes this neighbourhood special? (for example: local landmarks and places, community, connectivity, heritage, culture...)
- How do you feel about the quality of existing housing in this neighbourhood?
- Do you think new small-scale housing developments can help to improve the overall quality of this neighbourhood as well as providing much-needed homes?
- How would you describe a small-scale housing development that is well-integrated into the surrounding neighbourhood? (for example, regarding scale, materials, design, sustainability, heritage, amenity...)
- The Central Area Good Growth SPD will provide design guidance for small-scale housing developments. These may include roof/rear extensions to existing buildings, estate infill and building new developments of up to around 40 homes on sites of up to 0.25 hectares. What kind of design guidance would be helpful for this SPD to cover? (for example, setting out expected height and massing, setback from street, amenity space...)

Table 3 – Stage 2 Central Area Good Growth SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Place-Shaping officers	Workshop	A workshop session was held with council officers with heritage and urban design expertise to discuss approaches to conduct the Character Appraisal and to review early drafts.	27 th May 2020
Central Area residents, workers, visitors, and local community groups	Online survey	An online survey was made available on the SPD's page on Let's Talk Tower Hamlets alongside a description of the project, objectives and timescales. 30 detailed answers were received.	26 th August - 20 th September 2020

Central Area residents, workers, visitors, and local community groups	Q&A session	An online Q&A session was held to present more details about the SPD and answer questions. 10 people attended the session.	14 th September 2020
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Stage Three – Evidence-Gathering (existing challenges for small-scale developments)

1.12 The purpose of the communication at this stage of the project was to gather feedback on the key challenges to progressing small-scale residential developments through planning faced by Development Management to identify on which topics the SPD should focus its design recommendations. This also allowed for the identification of exemplar case-studies that were later included in the SPD to promote best-practice. Feedback was also sought on the types of small sites to be addressed by the SPD’s design guidelines.

Table 4 – Stage 3 Central Area Good Growth SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Development Management	Workshop	4 workshop sessions were held with officers from the East and West Development Management Teams. These focused on discussing case-studies and exploring options for guidance and recommendations that the SPD could provide and their implications for the development management process. The types of small sites to be addressed by the SPD’s design guidelines were also discussed.	July - September 2020

Stage Four – Draft Testing

1.13 The purpose of the communication at this stage of the project was to present the draft design guidelines and recommendations to test them with a variety of internal and external stakeholders and gather feedback ahead of publishing the draft SPD for statutory consultation.

Table 5 – Stage 4 Central Area Good Growth SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Conservation and Design Advisory Panel (CADAP)	Presentation and discussion	Presentation made to Tower Hamlets' panel of design experts focused on the SPD's draft design guidelines and types of small sites that the document focused on.	12 th October 2020
Place-Shaping	Workshop	A workshop session was held with council officers with heritage and urban design expertise to discuss the SPD's draft design guidelines. The session also allowed for officers to co-design new/revised design guidelines for the SPD to incorporate.	20 th October 2020
Development Management	Workshop	A workshop session was held with officers from the East and West Development Management Teams to discuss the SPD's draft design guidelines. The session also allowed for officers to co-design new/revised design guidelines for the SPD to incorporate.	29 th October 2020

Architects and developers	Workshop	A workshop session was held with architects and developers with experience of designing/delivering residential developments on small sites and/or with practices based in the borough. 16 representatives with architecture, urban design, housing, and development expertise attended the workshop where the SPD's draft design guidelines were presented and discussed.	9 th November
Development Management, Divisional Director and Deputy Director for Planning and Building Control	Briefing	Officers from Development Management and the Divisional and Deputy Director for Planning and Building Control were briefed on the draft SPD including on feedback received through the workshop with architects and developers.	17 th November 2020
Mayor's Planning Meeting and Lead Member for Planning and Social Inclusion	Briefing	The Mayor and Lead Member for Planning and Social Inclusion were briefed on the draft SPD.	18 th November 2020
Small Sites Working Group	Presentation and discussion	Presentation made to the Small Sites Working Group, which is formed by officers from local authorities across London and the GLA, focused on the SPD's	20 th November 2020

		draft design guidelines and types of small sites that the document focused on.	
Tower Hamlets Housing Forum (THHF)	Presentation and discussion	Presentation made to the THHF's Development sub-group on the draft SPD, with a particular focus on implications for their future developments.	26 th November

Stage Five – Statutory Consultation

1.14 The statutory consultation period for the draft Central Area Good Growth SPD lasted for six weeks from 11th January to 21st February 2021. In order to reach the widest possible audience in a context where due to COVID-19-related restrictions no in-person events could be held, a mixture of online and offline engagement methods were used and 8 online events were organised, in addition to virtual drop-in sessions. A page was set up for the consultation using the council's Let's Talk Tower Hamlets platform. The page contained a detailed explanation about the SPD and background to the project, the draft SPD to be downloaded (in its entirety or only specific chapters), FAQs, as well as links to register for the consultation events, an online survey and an interactive map. All events were hosted using Microsoft Teams where attendees could ask questions/make comments or write them using the chat function. A recording of the Launch Event was made available on the Let's Talk Tower Hamlets page to allow those who were unable to attend the event to watch it. The recording included an explanation of the background of the SPD, its objectives, how the document is structured and how to respond to the consultation.

1.15 Events were planned to address different topics and reach varied stakeholders. They included presentation and discussion sessions focused on specific sections of the SPD (such as the Character Appraisal or Guidelines for Good Growth) as well as workshops that targeted specific stakeholders such as self-build groups and neighbourhood forums; industry professionals; and young residents. The format of each event was adapted for each target audience to make them as accessible and engaging as possible.

1.16 In total, 88 people attended the events; 74 people responded to the online survey and provided over 146 written comments in total; 16 representations were received via email and 10 responses were added to the online interactive map. There were over 3,000 visits to the SPD's Let's Talk Tower Hamlets Page and 955 downloads of the draft document.

Table 6 – Stage 5 Central Area Good Growth SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
General public, Local Plan Database and local community groups	Media campaign and targeted emailing	Publication on the council's website; notices in the Docklands & East London Advertiser and London Gazette; leaflets sent to every household in the Central Area; paid ads on Facebook and other posts in social media such as Twitter, Facebook and LinkedIn; mention in council's external newsletter and Member's Bulletin; 400 targeted emails; posters in parks and Idea Stores informing of consultation events and activities.	11 th January – 21 st February 2021
General public	Hard copies of the draft SPD	Hard copies of the draft SPD were made available in Idea Stores. Although there were restrictions in place which meant the public could not stay in the Idea Stores to look at the document, the copies could be borrowed following the same procedure of book loans.	11 th January – 21 st February 2021
General public and Local Plan Database	Online consultation portal	Online material including background to the project, the draft SPD (including option to see the whole document or	11 th January – 21 st

		specific chapters), details of how to comment and links to online events and recording of Launch Event.	February 2021
General public and Local Plan Database	Online survey and contact details	Online survey developed and hosted via the consultation portal to structure responses to the SPD. An email address was also provided for written representations. 74 people responded to the survey providing 146 written comments in total. 16 written representations sent via email were also received. There were over 3,000 visits to the SPD's Let's Talk Tower Hamlets page and 955 downloads of the draft document.	11th January – 21st February 2021
General public and Local Plan Database	Online interactive map	Online interactive map hosted via the consultation portal and where anyone could add pins to mark existing residential projects that they deemed successful. 10 responses were added to the map.	11th January – 21st February 2021
General public, members and council teams involved in the SPD development	Launch Event	A presentation and discussion on the SPD including time for Q&A. 25 people attended the event.	20 th January 2021
General public and Local Plan Database	Drop-in sessions	Anyone could schedule slots in two dedicated days to ask questions and discuss the projects with SPD officers.	26 th January 2021 and 3 rd February 2021

Industry professionals	Public Practice Workshop	A workshop session was held with architecture, urban design and planning experts from the Public Practice network, which is formed by officers looking in local authorities across London. The session focused on the draft SPD's design guidelines and recommendations. 11 people attended the workshop.	4 th February 2021
General public, Local Plan Database	Character Appraisal-focused presentations and discussions	Three sessions were held to present and discuss the draft SPD's Character Appraisal. Each session focused on a different set of neighbourhoods so that local residents could attend the one most relevant to them. In total, 22 people attended the three events.	8 th , 9 th and 10 th February 2021
Individuals registered in the Tower Hamlets' Self-Build Register and Neighbourhood Forums	Self-build and neighbourhood forums-focused workshop	A workshop that targeted specifically individuals interested in self-build and neighbourhood forums within the Central Area was held to discuss the draft SPD's Character Appraisal and draft design guidelines. 5 people attended the workshop which was chaired by the Council's Affordable Self-Build Programme Manager.	11 th February
People aged between 16-25 who live and/or study in Tower Hamlets	Youth-focused workshop	A workshop that targeted specifically young residents was held to discuss the draft SPD's Character Appraisal and draft design guidelines. 17 young residents attended the workshop and every participant was reimbursed with a £20 voucher for their time.	16 th February 2021
General public,	Design guidelines-	A session was held to present and	17 th

Local Plan Database	focused presentation and discussion	discuss the draft SPD's design guidelines and recommendations. 8 people attended the event.	February 2021
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Stage Six – Adoption

1.17 Following a review of the representations received through the statutory consultation process, the SPD was amended. The preparation for adoption includes a briefing to members and corporate and directorate leadership teams on the outcome of the consultation and the recommendations for the way forward. Key changes being made to the SPD were also discussed with Strategic Planning and Development Management teams and they were also briefed on the SPD's future implementation after adoption.

Table 7 – Stage 6 Central Area Good Growth SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Strategic Planning and Development Management	Presentation and discussion	Sessions were held with officers from Strategic Planning and Development Management to brief the teams on the SPD's overall guidelines and future implementation following adoption.	10 th and 15 th March 2021
Strategic Planning, Development Management and Divisional Director for Planning and Building Control	Workshop	A session was held with officers from Strategic Planning, Development Management and the Divisional Director for Planning and Building Control to discuss key changes proposed to the SPD as part of statutory consultation process and best way forward.	26 th March 2021

<p>Statutory Environmental Bodies</p>	<p>SEA Screening Determination</p>	<p>To confirm that the SPD does not require an SEA, in accordance with the requirements of regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004.</p>	<p>April 2021</p>
<p>Political, Corporate and Directorate Leadership</p>	<p>Briefing</p>	<p>Mayor's Planning Meeting, Lead Member one-to-one, CLT and DLT to brief on the outcome of the consultation and recommendations for the way forward.</p>	<p>March-June 2021</p>

Consultation and Engagement Feedback

Overview and Summary

- 1.18 This section of the Consultation and Engagement Report summarises the feedback received through the consultation on the SPD. This includes representations and comments submitted, and the Council’s response to these. The comments and representations received through the consultation process have been used to finalise the SPD.
- 1.19 The statutory consultation period for the draft Central Area Good Growth SPD ran from 11th January to 21st February 2021.
- 1.20 88 people attended the consultation events held by the Council. Representations were received from a range of stakeholders including local residents and students, neighbourhood forums, statutory consultees, architects and developers: 74 people responded to the online survey and provided 146 written comments in total; 16 representations were received via email and 10 responses were added to the online interactive map.
- 1.21 A summary of the key issues that were raised in the representations are detailed in the table below. This is divided into a summary of general comments on the document; comments on the Character Appraisal; and comments on the Guidelines for Good Growth. As the survey also contained multiple choice questions, the quantitative data collected through the responses is also described.

Table 8 – Central Area Good Growth SPD Consultation Feedback Summary

General Comments	
Key Issues	Council Response
<p>The document was praised for bringing a proactive approach to ensuring residential developments are high-quality and respectful of existing context.</p> <p>In terms of increasing housing supply, especially affordable housing, feedback varied. There were positive comments about the benefit of developing infill sites</p>	<p>It is outside of the SPD’s scope to allocate specific sites or to have a direct impact on housing delivery (including affordable and community-led housing). Similarly, the SPD will not cause an increase of housing that was not already accounted for and planned for by the Tower Hamlets Local Plan. An SPD can only provide guidance to existing policies and the Central Area Good Growth SPD</p>

<p>that otherwise would detract from the quality of the environment. Some comments asked for the SPD to allocate sites for affordable housing and community-led housing, whilst others expressed concern over the document meaning that more housing would be built than the area could accommodate which in turn would increase pressure on local infrastructure, parks and parking spaces.</p>	<p>specifically provides design guidance to ensure that future housing developments delivered in the Central Area are respectful of context and that they benefit both existing and future residents by promoting higher-quality design, external amenity spaces, green spaces/coverage and sustainable use of materials. Finally, although the SPD cannot have a direct impact on affordable housing provision, by providing more planning certainty it is expected it will support delivery of all types of housing, including affordable and community-led housing.</p>
<p>There were comments around the document not being clear about what it is proposing; how the SPD relates to other policy documents such as the Tower Hamlets Local Plan and emerging neighbourhood plans; and how the SPD will impact planning applications and decisions.</p> <p>It was also said that it was not clear who the document was aimed at (developers, homeowners, council).</p>	<p>The Introduction to the SPD, particularly the section 'How to use this document' has been amended to include a clearer explanation about the aims of the document and how its two parts (Part A and Part B) work together; a diagram and accompanying text was included to explain how the SPD relates to the Development Plan (which includes the Tower Hamlets Local Plan, the London Plan and Neighbourhood Plans); a paragraph was also included to clarify who should use the document and at what stages of the planning process it will be used and how. It was also made clear that the SPD provides guidelines for anyone (developers, homeowners, community groups, the council, housing associations) who is putting forward a planning application for a residential development on a small site in the Central Area of Tower Hamlets.</p>
<p>Historic England suggested that the SPD's overall approach could be further strengthened by adding specific references to the concepts of significance of heritage assets and their setting, starting with inclusion in the Glossary section and introductory pages to each chapter in Part B.</p>	<p>We consider that there is enough detail about heritage assets in the SPD and clear references to where more information should be sought e.g. Tower Hamlets Conservation Strategy (2017), Conservation Area Appraisals and Management Plans, and the Planning (Listed Buildings and Conservation Areas) Act 1990 and therefore there is not a need to add detailed mentions to the significance of heritage assets. The glossary has been amended to include a definition of setting of heritage asset as this term was already used by the SPD.</p>

<p>Some comments pointed out that the term 'Urban Grain' is too technical and not accessible to the majority of people. Moreover, the word 'subordinate' is considered too subjective for design guidelines</p>	<p>The term has been replaced by 'Street Pattern' and a new inclusion in the document's Glossary has been added to ensure its meaning is clear. The word subordinate is not used anymore, and a review of all terminology used in the SPD was done to ensure accessibility and clarity.</p>
<p>Comments on Character Appraisal</p>	
<p>Key Issues</p>	<p>Council Response</p>
<p>Local residents sent many comments about the Character Appraisal and specific Character Places including factual errors, suggested mentions to key locations/places, proximity to green spaces and community spaces that were not previously included in the document.</p>	<p>The factual corrections and additions were made as suggested in the comments received. Moreover, quotes received through the survey, emails and events were added in an anonymised format to the introduction page of each Character Place to ensure that local views are also directly reflected in each of them.</p>
<p>It was requested that maps are made clearer specially where it is not easy to understand what the different boundaries shown mean.</p> <p>It was also pointed out that buildings on Cadogan Terrace shown in the Character Place Victoria Park are outside of the Central Area and that led to confusion.</p>	<p>Maps have been amended to ensure that boundaries are clearly defined.</p> <p>The building is not shown in maps or photos anymore.</p>
<p>It was suggested that movement maps should show existing cycling lanes/routes.</p>	<p>These have been added to maps.</p>
<p>Several comments were received on the analysis of Urban and Building Types in the Residential Typologies Chapter. They mostly related to people's lived experiences of buildings including maintenance difficulties; the ways in which some open spaces promote community cohesion whilst others do not; the sense of safety that some developments provide to passers-by; the benefits brought by modern developments in regenerating wider areas but constant issues with materials often not being in line with existing character and not weathering well.</p>	<p>Additions were included in the Residential Typologies Chapter to reflect comments received.</p>

Comments on Guidelines for Good Growth	
Key Issues	Council Response
<p>The Design Toolkit for Small Sites was praised for being clear and including useful case-studies. Some comments, however, questioned why case-studies located outside of the Central Area were included.</p>	<p>The document prioritised built examples in the Central Area and in the borough. However, as the main goal of case-studies was to provide as many examples as possible of high-quality design that is respectful of context, it was decided to include examples that fell outside of the Central Area and Tower Hamlets when these were considered exemplary to illustrate some of the SPD's recommendations and to help provide more clarity of the council's design expectations.</p>
<p>It was requested that the guidelines promote/account for mansard roof extensions to terraces in conservation areas. Comments also addressed how the SPD phrases the fact that it does not account for this type of development and the importance of allowing these extensions so that families can remain the borough and also make provisions for home-working in line with the changes brought by the COVID-19 pandemic</p>	<p>Guidelines for mansard roof extensions are provided by Conservation Area Character Appraisals and Management Plans where extensions are considered appropriate and therefore this is considered outside of the SPD's scope. The phrasing contained in the SPD provides a clear statement on where guidelines can be found.</p>
<p>Some architects questioned the appropriateness of BRE guidelines and the design principles addressing amenity in a context as dense and urban as Tower Hamlets.</p> <p>A resident also requested that it is clearly defined what acceptable loss of amenity means.</p>	<p>The SPD can only provide guidance to existing policies rather than create new policies. The council already refers to the BRE guidelines which are deemed appropriate and which the SPD refers to. Policy D.DH8: Amenity from the Tower Hamlets Local Plan explains the council's views on acceptable levels of amenity. This is therefore considered to be outside of the SPD's scope.</p>
<p>Some comments raised that guidelines were too restrictive and that there is an urgent need for housing that needs to be accounted for.</p>	<p>The guidelines and recommendations contained in the SPD are based on best-practice architecture and urban design considerations that reflect the council's aspirations and that ensure that developments benefit existing and future residents. The document does allow for flexibility by stating that applicants that do not comply with the guidelines will need to provide robust justification and demonstrate how their proposal meets exceptional</p>

	<p>design standards, which will be judged on a case-by-case basis. Moreover, it is considered that by providing additional guidance to existing policies the SPD increases planning certainty and therefore supports the delivery of much-needed housing.</p>
<p>Some representations questioned the impact of COVID-19 and whether the design guidelines should account for that, for instance by promoting COVID-19-secure design.</p>	<p>The impacts of the pandemic are still being reviewed and there has not been a consensus on if and how they should bring changes to existing policies and guidelines. The design guidelines and recommendations contained in the SPD, however, promote aspects whose importance has increased with the pandemic such as access to external amenity space, flexible and generous internal spaces, access to daylight/sunlight and privacy and energy efficiency.</p>
<p>Some comments said that the guidelines are too technical.</p>	<p>The design guidelines require a certain level of technicality to ensure that they are robust and applicable to residential developments. Language and terminology were reviewed to ensure that they are accessible and clear for a wider audience and new mentions were added to the Glossary.</p>
<p>Comments related to the ways in which planning applications are processed were received, some of which questioned the fairness of how case-officers assess applications.</p>	<p>This is considered outside of the SPD's scope.</p>
<p>Comments were received asking for design guidelines to promote a sense of community. This feedback was particularly strong among young people.</p> <p>The Roman Road Neighbourhood Forum also raised the need for the SPD to support community-led housing.</p>	<p>A new Design Principle focused on Community was included in the SPD. It was written by directly following feedback received and the need to promote spaces that foster shared activities between residents such as allotments and spaces for gardening and that include furniture that promotes communal uses. The principle also highlights that small sites present a good opportunity for community-led housing, including developments that cater for specific needs such as co-housing schemes.</p>
<p>Several representations by residents, TfL and Thames Water related to guidelines</p>	<p>It is considered appropriate to address bin and bike storage under the same principle as these are usually challenging in</p>

<p>on waste and bike storage.</p> <p>It was raised that it is negative to address waste and bike storage under the same design principle as this may attach a negative perception to bike storage, cyclists and cycling in general. Moreover, it was said that the majority of the text is concerned with waste disposal and now enough was discussed around bike storage.</p> <p>It was also recommended that the principle should be expanded to include measures to locate bin and bike storage areas away from public space and/or green and blue infrastructure particularly due to their social and environmental well-being benefits.</p>	<p>designing for housing on small sites and earlier feedback from Development Management officers and architects praised them being tackled together. Moreover, waste disposal is treated in a positive way since innovative solutions, which are key for achieving sustainability, are promoted. We have, however, included more guidelines and photos for bike storage to promote its importance.</p> <p>A sentence was added to clarify that communal bin storage should be located in a way that minimises disturbance for streets, green spaces and waterways. It was considered that well-designed bike storage would not have a negative effect on these spaces.</p>
<p>Residents asked for more roads to be converted into pedestrian/cycling-only roads and for the council to create more low traffic neighbourhoods and provide improvements to existing cycling lanes and walking infrastructure.</p>	<p>Although the SPD provides recommendations on how developments should establish a positive relationship with the street, public realm, green and blue infrastructure and also make provisions for convenient and accessible bike storage, it is outside of the document's scope to implement direct changes to roads and existing walking and cycling infrastructure. The council is addressing this with the Liveable Streets Programme.</p>
<p>Comments on parking varied. Whilst some residents expressed concerns that more housing developments would increase pressure on on-street parking spaces and traffic, others said that car-free developments do not account for families' needs.</p>	<p>Car parking and highways implications are covered through Local Plan policies and discussions with highways officers and are outside of the SPD's scope.</p>
<p>Some of the feedback received asked for the SPD to go further in its recommendations and either provide specific maximum height and density for new developments or state that new developments should have equal or smaller heights to the surrounding buildings.</p>	<p>The SPD has a broader approach to ensuring that new developments respect and enhance existing character whilst at the same time promoting innovation and sustainability. The guidelines and recommendations provided explain the key parameters that developments should follow such as existing building lines, street proportion and allowing for daylight/sunlight and privacy, all of which also have an effect</p>

	<p>on appropriate massing and height. This approach is deemed acceptable as it allows for flexibility and innovation whilst ensuring that developments respect key elements of the existing context.</p>
<p>Some residents asked for the SPD to specify exactly which types of brick is suitable to be used by new developments.</p>	<p>The SPD cannot specify one specific material deemed acceptable as this falls outside of the realms of planning and has wider implications on construction and availability of materials. However, the document does provide guidelines and examples of appropriate use of materials and innovation that still allow for new developments to integrate well with their surroundings.</p>

1.22 In addition to the option to provide written feedback, the online survey also included multiple choice questions that covered a variety of topics, such as comments on the clarity of where and how the guidance should be used and whether it is a useful documents for those who may apply for planning permission for residential developments in the area; on the descriptions of each Character Place in the Character Appraisal and also on the analysis of Urban Types and Residential Building Types. Survey respondents were also asked to consider the main goals of the SPD and whether in their view the document helps to achieve them. According to responses received, the aims with which the SPD was most successful were on providing guidance to help deliver housing growth and helping to ensure that new developments respect and enhance the well-established character of the Central Area.

1.23 The table below outlines the results of the quantitative survey. It is important to note that for the questions related to specific Character Places, respondents were advised to answer for the one in which they lived and/or knew well, which helps to explain why the number of response varies between them. Furthermore, none of the questions were mandatory, which also explains why some of them have fewer responses than the total number of people who responded to the survey, which was 74. Overall, feedback was positive, and the key written comments received as part of the survey were addressed together with other representations in Table 8.

Table 9 – Central Area Good Growth Quantitative Online Survey Summary

Do you understand where in Tower Hamlets the guidance will apply and for which types of projects?				
Yes	Not sure	No	-	
58 (77.3%)	11 (14.7%)	6 (8%)	-	
Do you agree with the way we describe Bow?				
Introduction				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
15 (62.22%)	5 (21.74%)	2 (8.70%)	1 (4.35%)	0 (0%)
History & heritage				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
15 (68.18%)	4 (18.18%)	2 (9.09%)	0 (0%)	1 (4.55%)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
11 (50.00%)	8 (36.36%)	3 (13.64%)	0 (0%)	0 (0%)
Do you agree with the way we describe Bow Common?				
Introduction				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
2 (28.57%)	3 (42.86%)	0 (0%)	0 (0%)	2 (28.57%)
History & heritage				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
2 (28.57%)	3 (42.86%)	0 (0%)	0 (0%)	2 (28.75)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
2 (28.75%)	1 (14.29%)	1 (14.29%)	2 (28.57%)	1 (14.29%)
Do you agree with the way we describe Globe Town?				
Introduction				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
8 (53.33%)	5 (33.33%)	2 (13.33%)	0 (0%)	0 (0%)
History & heritage				

Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
6 (40%)	7 (46.67%)	2 (13.33%)	0 (0%)	0 (0%)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
6 (40.00%)	7 (46.67%)	2 (13.33%)	0 (0%)	0 (0%)
Do you agree with the way we describe Limehouse?				
Introduction				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
3 (75.00%)	1 (25.00%)	0 (0%)	0 (0%)	0 (0%)
History & heritage				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
3 (75.00%)	1 (25.00%)	0 (0%)	0 (0%)	0 (0%)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
2 (50.00%)	1 (25.00%)	1 (25.00%)	0 (0%)	0 (0%)
Do you agree with the way we describe Mile End?				
Introduction				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
2 (28.57%)	4 (57.14%)	1 (14.29%)	0 (0%)	0 (0%)
History & heritage				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
4 (57.14%)	3 (42.86%)	0 (0%)	0 (0%)	0 (0%)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
2 (28.57%)	5 (71.43%)	0 (0%)	0 (0%)	0 (0%)
Do you agree with the way we describe Poplar?				
Introduction				
Definitely agree	Somewhat	Neither agree	Somewhat	Definitely

	agree	nor disagree	disagree	disagree
1 (50.00%)	1 (50.00%)	0 (0%)	0 (0%)	0 (0%)
History & heritage				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
1 (50.00%)	1 (50.00%)	0 (0%)	0 (0%)	0 (0%)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
1 (50.00%)	1 (50.00%)	0 (0%)	0 (0%)	0 (0%)
Do you agree with the way we describe Stepney?				
Introduction				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
6 (54.55%)	4 (36.36%)	0 (0%)	1 (9.09%)	0 (0%)
History & heritage				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
7 (63.64%)	4 (36.36%)	0 (0%)	0 (0%)	0 (0%)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
3 (27.27%)	5 (45.45%)	0 (0%)	0 (0%)	3 (27.27%)
Do you agree with the way we describe Victoria Park?				
Introduction				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
1 (33.33%)	1 (33.33%)	0 (0%)	0 (0%)	1 (33.33%)
History & heritage				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
1 (33.33%)	1 (33.33%)	1 (33.33%)	0 (0%)	0 (0%)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
1 (33.33%)	1 (33.33%)	1 (33.33%)	0 (0%)	0 (0%)

Do you agree with the way we describe Wapping?				
Introduction				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
1 (33.33%)	2 (66.67%)	0 (0%)	0 (0%)	0 (0%)
History & heritage				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
1 (33.33%)	2 (66.67%)	0 (0%)	0 (0%)	0 (0%)
Townscape, urban grain & movement				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
1 (33.33%)	2 (66.67%)	0 (0%)	0 (0%)	0 (0%)
Do you agree with the analysis of the Urban Type and Residential Building Types?				
Georgian and Victorian Housing Growth				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
37 (49.33%)	24 (32.00%)	12 (16.00%)	0 (0%)	2 (2.67%)
Interwar Housing				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
30 (42.25%)	25 (35.21%)	13 (18.31%)	0 (0%)	3 (4.23%)
Post-war 'Visionary Reconstruction'				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
25 (35.71%)	22 (31.43%)	17 (24.29%)	3 (4.29%)	3 (4.29%)
Waterfront Housing Developments				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
28 (38.36%)	25 (34.25%)	17 (23.29%)	1 (1.3%)	2 (2.74%)
Late 20th Century Urban and Suburban				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree
24 (33.33%)	27 (37.50%)	15 (20.83%)	4 (5.56%)	2 (2.78%)
21st Century Housing Growth				
Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree

	agree	nor disagree	disagree	disagree
26 (37.14%)	25 (35.71%)	14 (20.00%)	3 (4.29%)	2 (2.86%)
Below are the aims of the document, do you agree that the document helps achieving these?				
Provides guidance to help deliver housing growth				
Agree	Neither agree nor disagree	Disagree	-	
45 (60.81%)	16 (21.62%)	13 (17.57%)	-	
Helps to ensure that new developments respect and enhance the well-established character of this part of the borough				
Agree	Neither agree nor disagree	Disagree	-	
44 (60.27%)	16 (21.92%)	13 (17.81%)	-	
Encourages good quality housing				
Agree	Neither agree nor disagree	Disagree	-	
40 (54.79%)	19 (26.03%)	14 (19.18%)	-	
Allows for a variety of housing solutions and promotes innovation where possible				
Agree	Neither agree nor disagree	Disagree	-	
42 (57.53%)	18 (24.66%)	13 (17.81%)	-	
Helps those involved in putting forward development proposals such as residents, homeowners, community groups, developers and associated agents				
Agree	Neither agree nor disagree	Disagree	-	
36 (50%)	18 (25%)	18 (25%)	-	
Are the case-studies and examples provided helpful?				
Yes	Not sure	No	-	
49 (67.1%)	14 (19.2%)	10 (13.7%)	-	