

**Spitalfields Neighbourhood Forum**



**Spitalfields  
Neighbourhood Plan  
2020-2035**

**Consultation Statement – draft 4**

**October 2020**

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# 1 CONSULTATION PROCESS

## Introduction

- 1.1 This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Spitalfields Neighbourhood Plan (SNP).
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:
  - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted; and
  - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the SNP are as a result of considerable interaction and consultation with the community and businesses within the Forum area. Work has involved community groups over approximately six years, as well as surveys and public events. This has been overseen and coordinated by the Spitalfields Neighbourhood Forum Steering Group, which was formed to lead the SNP. At various stages through the SNP process, professional planning consultants have been appointed to support the development of the Plan together. Views and interactions from this entire process led to the Vision and Objectives in the SNP, and subsequently therefore form the basis for the key policies set out in the SNP.

## Consultation process

- 1.4 An Interim Steering Group (ISG) with purpose of establishing a neighbourhood forum was established after a joint decision in December 2013 by the Spitalfields Society (an amenity society established 1992) and the Spitalfields Community Group (established 2011) to work together on this project. It was agreed by the two groups that the creation of a neighbourhood plan would meet the aims and objectives of both the local organisations and would improve Spitalfields as a place to live and work.
- 1.5 The work to establish a neighbourhood forum and define a neighbourhood area would be coordinated by an Interim Steering Group established for that purpose.
- 1.6 In early 2014 the Interim Steering Group appointed Lorraine Hart as a consultant and began meeting together.
- 1.7 The draft Constitution was based upon other similar constitutions successfully used in other neighbourhood forums.
- 1.8 When the ISG was considering its proposal for a neighbourhood area, the first thing it did was ask Tower Hamlets Borough Council (THBC) for advice. They were advised by the Strategic Planning Department that a sensible approach would be to first determine the area which they understood

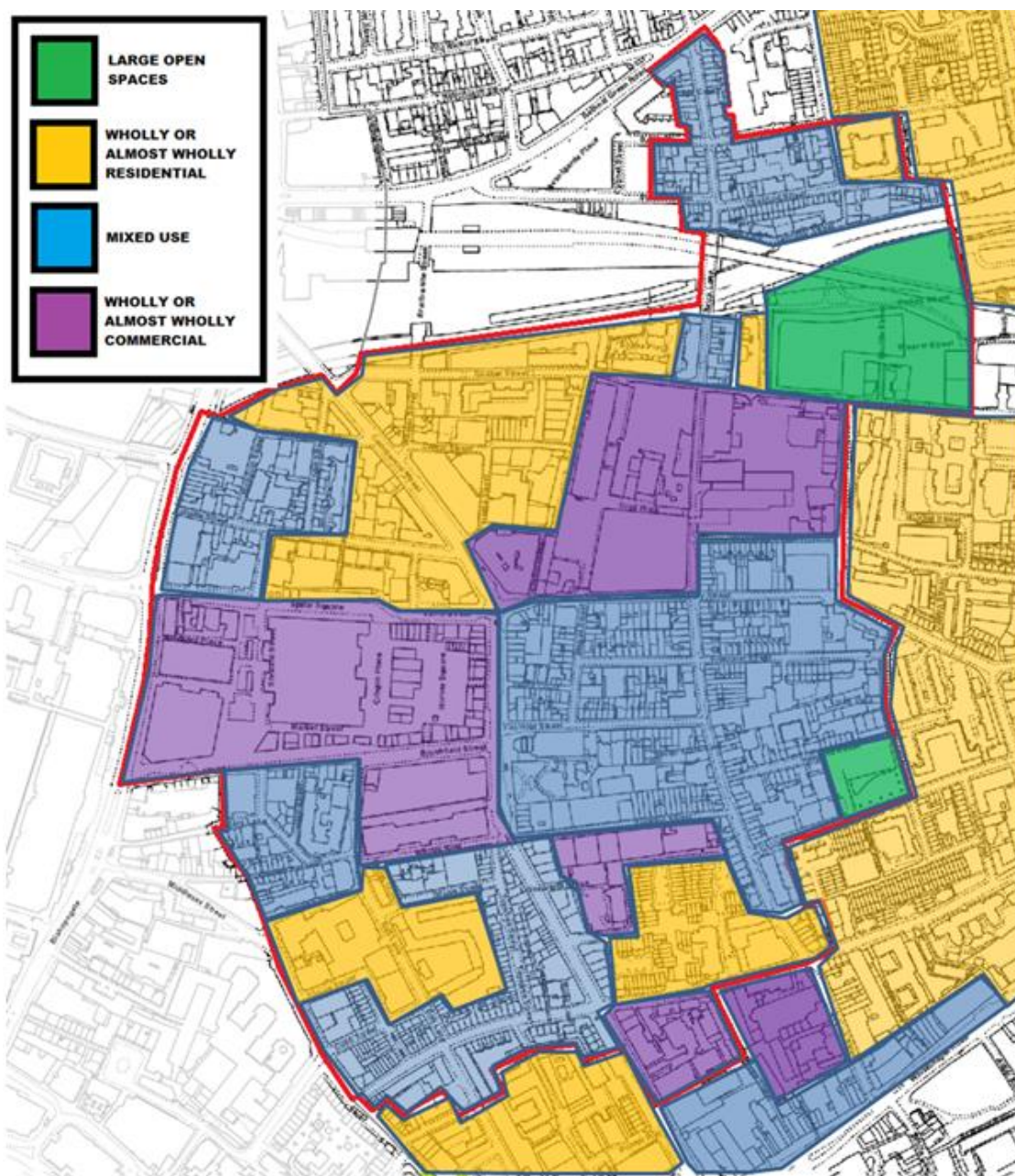
to be the 'core' of Spitalfields and after that to consider where the peripheral areas around that core might be. The contact at the planning department also agreed with the early position of the ISG that the ward boundaries covered a very large area (which at that particular time were about to be reviewed as part of a Local Government Boundary Commission review) and thus did not, and may not in the future, represent an area well-suited for neighbourhood planning purposes. The Weavers ward boundaries had not formed the basis of the neighbourhood area recently designated in East Shoreditch, for example.

- 1.9 After the ISG had identified a core area for Spitalfields that was centred on Brick Lane, the Old Truman Brewery (OTB), Christ Church, Spitalfields Market and the Jamme Masjid, it then slowly determined the peripheral area around it. This periphery was based on a study of the existing planning landscape such as the location of the various Conservation Areas, the Town Centre Hierarchy, the Cumulative Impact (Licensing) Zone and the Central Activity Zone borders. It was agreed it was sensible that the area proposed should be as compact as possible and avoid any detached parts, enclaves or confusing extensions. It was also agreed that the western boundary should extend to the edge of Tower Hamlets borough. In other places it was decided to base the boundaries on a study of the physical realities on the ground; it was agreed that this should include both sides or whole lengths of important thoroughfares as well as urban grain and land use. It was agreed that both sides of Whitechapel High Street were in Whitechapel. It was then decided that Wentworth Street, a distinctive commercial area famous for Petticoat Lane Market, should form a southern limit and that both sides of this street should be within the proposed neighbourhood area. It was agreed that the whole lengths of the Commercial Street and Brick Lane 'high streets' should fall within the neighbourhood area, where practicable, and this concept as well as the existence of the Bishopsgate Goods Yard Strategic Site and the adjacent border of the newly created East Shoreditch Neighbourhood Area informed the northern boundary. The marked contrast in the urban grain and land use on either side of the Spital Street and Spelman Street axis was so apparent in the maps, aerial photos and plans that were studied, that it was agreed that these streets would be an appropriate easterly limit to the neighbourhood. These decisions were designed to ensure the neighbourhood area remained focussed on the heart of Spitalfields with its distinctive mix of residential and commercial areas and would be an Area where future neighbourhood planning policies could be applied consistently.
- 1.10 Throughout 2014 the ISG shared these ideas and proposals about the boundaries with the Strategic Planning Department at THBC who informed the ISG that they thought the boundary proposals were good for neighbourhood plan making purposes.
- 1.11 The ISG decided to organise two public consultation meetings to invite comments on draft proposals for a constitution and the boundaries of the neighbourhood area. The first consultation event in July 2014 would be for local stakeholders and a second consultation event held a little later in August would be for the general public.
- 1.12 Using a variety of local contacts the ISG began to draft a list of local 'stakeholders' whom it would aim to consult with as early as possible regarding neighbourhood planning in Spitalfields. Particular regard was paid to ensuring it would reach ALL sections of the community, particularly hard-to-reach sectors. This list was created using the ISG's own developing knowledge as well as reaching out to groups such as the Tower Hamlets Council Volunteer Centre, Toynbee Hall and extending its contacts to a wider list of local groups involved in the public consultations on the Bishopsgate

Goods Yard development (list produced by Soundings for Ballymore/Hammerson). Via these sources it was possible to put together a list of about 75 local organisations, resident groups and notable business interests in the area which would be the 'stakeholders'. This group was not 'set in stone' but was fluid as more names were added and some which were inactive were removed.

- 1.13 In mid-2014, a leaflet was produced called *Your Spitalfields: Your Future* and delivered by hand to every residential and business address in the central Spitalfields area. This leaflet explained what neighbourhood planning was and invited recipients to attend the public consultation meeting in August to learn more about the opportunities it presented communities such as ours. At around the same time a letter was sent to each of the 75 stakeholders we had identified which invited them to a separate stakeholders meeting in July.

**Analysis to help establish the Neighbourhood Area boundary, 2014**



- 1.14 In July 2014 representatives of 26 local stakeholders attended a stakeholder consultation meeting at the Attlee Centre and gave detailed feedback to us about how they thought a neighbourhood plan might help meet the needs of the local area. These organisations represented tenants', community and residents' groups, key local businesses and employers, charities and trusts and heritage groups and business associations who had all responded to the letters that had been sent out.
- 1.15 In early August 2014 a second public consultation meeting was held, also at the Attlee Centre. Many local people attended this after receiving our leaflet and learnt about neighbourhood planning and gave us further helpful feedback. At this meeting it was agreed by those persons present that the neighbourhood area boundary should be extended slightly to include Spitalfields City Farm and the Chicksand Street Ghat.
- 1.16 At both these meetings the ISG began gathering members of the prospective neighbourhood forum and established three categories of membership: (a) resident member; (b) business member; (c) representatives of local non-profit organisations. Through these meetings and through the dedicated website, 90 members were signed up by the time of the inaugural meeting.
- 1.17 On 18 August 2014 the inaugural meeting of the Spitalfields Neighbourhood Planning Forum was held with 34 members in attendance. At this meeting the boundaries of the proposed neighbourhood area and the terms of the proposed constitution were debated and adopted by local people. An alternative boundary proposal that excluded the Truman Estate was considered but ultimately a version of the bounds that included that estate was agreed in a vote. The prospective neighbourhood forum was then formed and its elected committee of 12 people was tasked with submitting an application for official Forum approval and Area designation to THBC.
- 1.18 The committee that was formed at the inaugural meeting was assembled according to the Constitution and consisted of 12 members so elected for that purpose from among the general membership. There were six resident members elected, three business members elected (representing Zeloof LLP, Old Truman Brewery and Johnson Architecture & Design) and three local organisation members elected (representing SOUL, Attlee Youth & Community Centre and Friends of Mallon Gardens).
- 1.19 An application for Forum approval and Area designation was made in December 2014. During the discussions that followed between the prospective neighbourhood forum and THBC, representations were made by local business organisations who argued that the proposed neighbourhood area had substantial areas which were wholly or predominantly commercial in nature. Subsequently, the THBC Strategic Planning Department recommended that the Area designation application be revised to make it an application for a business neighbourhood area. THBC also recommended some physical changes to the boundary so that it included the whole of the Holland Estate. These recommendations were supported.
- 1.20 The revised Business Neighbourhood Area designation application and the Neighbourhood Forum application were both eventually approved (with some minor boundary changes) by THBC in a designation and approval statement made in April 2016 which established the Spitalfields Neighbourhood Area as a business neighbourhood area and approved the Spitalfields Neighbourhood Planning Forum as the neighbourhood forum for the Spitalfields Neighbourhood Area.

- 1.21 During 2015 and 2016 the committee (called the 'Forum Council') considered different ways of understanding local planning policies and consulting local people on them. A 'consultation framework' was agreed that would be used by variously themed policy working groups so they operated within common parameters. The working groups would research and understand the existing planning policy in particular areas of interest and then reach out to the local community to get their input on particular problems and opportunities in that policy area.

**Meeting of Spitalfields Forum Council, 2017**



- 1.22 In 2017 the Forum appointed Tony Burton as a consultant to help refine the processes that the Forum had already begun to develop. It was agreed to continue the established policy of diversified consultation by having separate and bespoke consultation methods with one type aimed at 'local stakeholder consultations' (primarily local businesses and other organisations with an interest in Spitalfields) and another type aimed at the general public, local residents and workers.
- 1.23 To advance the first type, a list of about 40 local stakeholders was drawn up and letters were sent to them inviting them to take part in our consultations about the needs and opportunities in Spitalfields. Around half of these stakeholders agreed to engage with the Forum.
- 1.24 Participants in the stakeholder consultation exercise included the Cabinet member for Strategic Development at THBC, representatives of the owners of Old Spitalfields Market, the director of the East End Trades Guild, representatives of the owners of the Old Truman Brewery estate, the author of Spitalfields Life (a local, online publication), representatives of Spitalfields Housing Association and East End Homes, Spitalfields Community Group, the Spitalfields Society, Spitalfields Historic Buildings Trust, the Friends of Christ Church Spitalfields, the Rector of Christ Church Spitalfields, the chairman of the Banglatown Restaurants' Association, the organiser of the Bengali East End Heritage Society, representatives of British Land and Spitalfields City Farm.



- 1.25 These consultations consisted of face-to-face interviews asking a set of questions common to each interview. The interview lasted about an hour and were recorded and later codified so the themes and priorities could be drawn out in such a way as to be made quantifiable. The interviews took place during 2017 and 2018 and the analysis of the data derived from these interviews was made by Gracechurch Consulting (which is a full member of the Market Research Society) in September 2018. This full report by Gracechurch Consulting as well as a full list of respondents can be seen in Appendix A. When the extent of this research began to be evaluated and the range of contributions by local businesses was evaluated by our consultant Tony Burton he said the efforts we had made to ensure businesses were included in our plan making process were “among the best he had seen”.

#### **Activity at the Spitalfields Forum AGM, October 2017**



- 1.26 In March 2017, Commonplace was appointed to facilitate the Forum’s general public consultation. The Commonplace survey platform has been used by many neighbourhood plan making bodies to record public opinion about particular places in their neighbourhood area. This survey recorded how people felt about those particular places or issues and provided an opportunity for them to recommend improvements. To encourage participation, three walkabout tours took place where members of the public joined Forum committee members to visit parts of Spitalfields and record their views on the Commonplace platform. Public awareness of this consultation was made by a leaflet delivery and through a public meeting where the survey platform was launched and explained. Local newspapers reported on this meeting which further spread the word.
- 1.27 In September 2017 the Forum determined that it had to ramp up its efforts to seek the views of harder-to-reach communities, in particular the British-Bengali community. It engaged with the East London Citizens Organisations (TELCO) which is part of the civic organisation Citizens UK (CUK) to



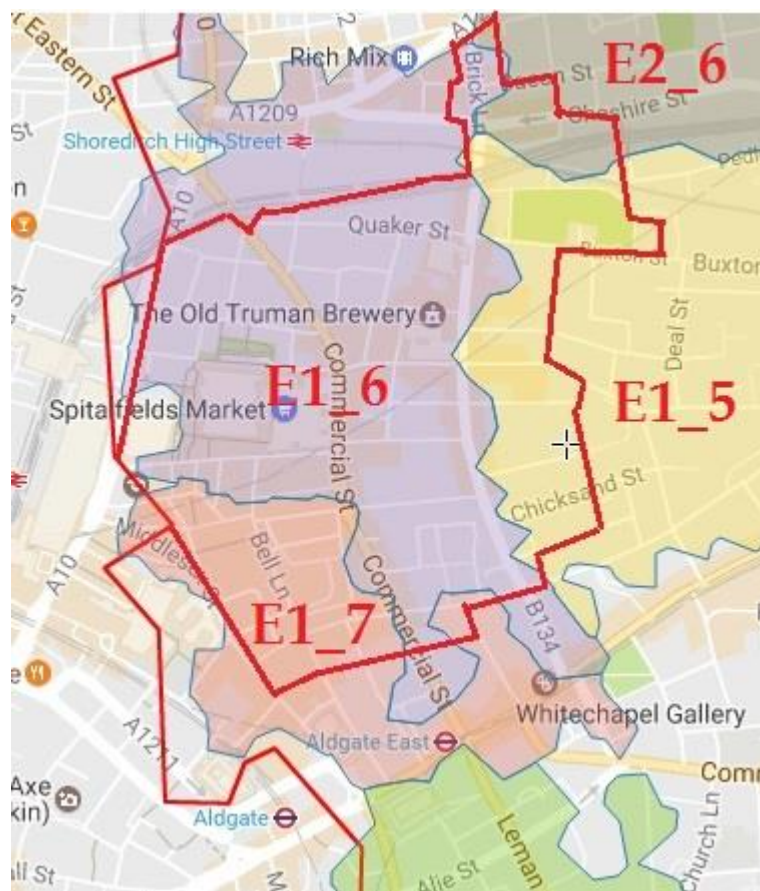
facilitate this. Their services were commissioned to use paper versions of the Commonplace survey form and approach the communities the Forum had hitherto struggled to get a representative level of engagement from. TELCO recruited students from the Geography Department at Queen Mary University to help them gather the data required.

**Advert in Janomot (a Bengali newsweekly) in 2017**

The image shows a collage of elements from a Bengali newspaper advertisement for Spitalfields Forum. At the top, it features the masthead of 'Janomot' newspaper, dated 28 July - 03 August 2017. A prominent headline reads 'নেতৃত্ব নিয়ে সংকটে থেরেসা মে!' (Theresa May in a crisis due to leadership). Below this is a photograph of Theresa May. To the left, there is a photograph of a crime scene with a 'POLICE LINE DO NOT CROSS' sign and a yellow evidence marker. Another section of the ad features a map of Spitalfields with numerous black dots indicating delivery points. Text blocks in Bengali provide information about the forum, including a public consultation ('পাবলিক কনসালটেশন') and a report on the discovery of a large number of knives ('এক সপ্তাহে উদ্ধার করা ছুরির ছবি প্রকাশ'). The ad also includes the forum's website, [spitalfieldsforum.org.uk](http://spitalfieldsforum.org.uk).

1.28 The Forum also tried its best to ensure local people knew about the work of the Forum by running a half-page Bengali-language advert in Janomot newspaper for three weeks in September 2017 and commissioning Royal Mail to do a door-to-door bulk delivery of a bilingual leaflet which was delivered to 5,266 household and business addresses in the E1-6 and E1-7 'postal sectors' in August 2017 (See Figure 1). The parts of the neighbourhood in other postal sectors were delivered by hand.

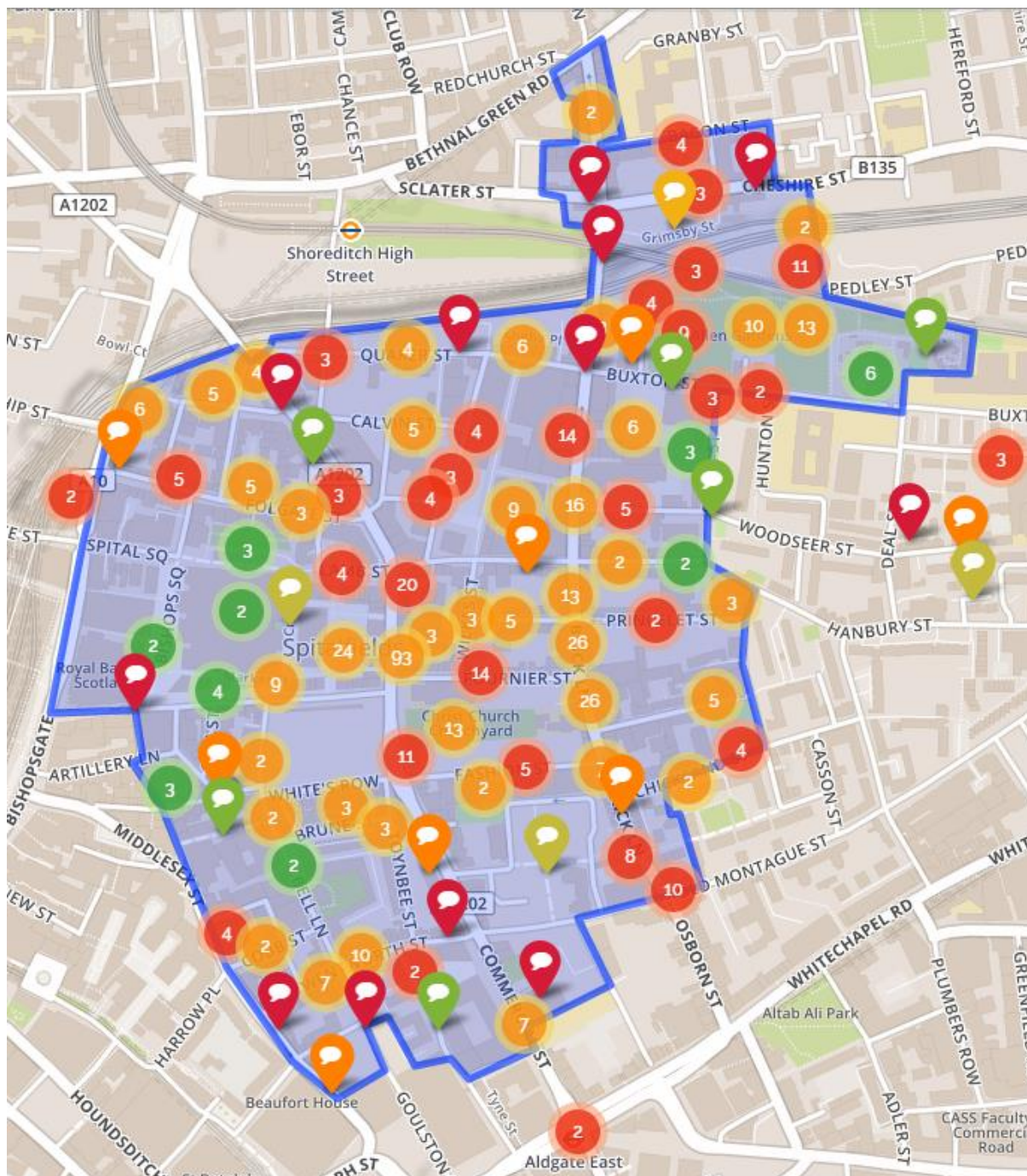
**Postal sectors that the bilingual leaflet was delivered to, 2017**



- 1.29 TELCO collected 231 surveys from members of the public at various locations determined by them as suitable for collecting the opinions of the hard-to-reach communities from whom more feedback was needed. They set up stalls and helped people fill in paper-based survey forms asking the same questions as the online Commonplace survey both at the Brick Lane Mosque and the East London Mosque. TELCO also engaged with the Brick Lane Trust, the Mariam Centre, Spitalfields Small Business Association, the Osmani Trust, Canon Barnett School and Christ Church Primary School and arranged for surveys to be emailed out to participants, resident groups and parents. The survey to resident liaison groups associated with Spitalfields Housing Association as well as the Brick Lane Trust included a £5 voucher to incentivise participation. The small local Sikh community also assisted by taking some paper survey forms to a community centre. Further details about the work of Citizens UK to assist the Forum can be seen in Appendix B.
- 1.30 In March 2018 this period of general public consultation came to an end. 1,809 separate people had visited the survey site in total. 664 people had read the site in depth but did not comment. 402 individuals had interacted in some way with the site by commenting or agreeing with other people's comments. These 402 people had made separate 602 comments and 1,492 agreements with other people's comments.



**Map showing location and number of comments to 2018 consultation**



- 1.31 In addition to these 402 people who actively took part in the Commonplace survey online, 231 people who had completed a paper survey were contacted directly by Citizens UK/TELCO and asked to indicate their views on places in Spitalfields.
- 1.32 The engagement that took place online and on paper can be understood in terms of the type of people who got involved. Of the total of 633 participants, 32% said they lived in the neighbourhood area, 30% said they worked there, 29% were visitors to the area and 9% indicated they were students.

- 1.33 The participants also indicated that 59% were female, 37% were male and 4% either did not record their gender or said they were another category.
- 1.34 In terms of ethnicity, respondents closely matched national statistics data for the Forum area. The largest group of contributors declared they were white (39%), with a slightly smaller proportion saying they were British-Bengali/Bangladeshi (37%). In addition, a further 7% said they were “other Asian”, 9% said they identified as black, 4% were mixed race and 4% did not declare an ethnicity.
- 1.35 National Statistics data from the Census of 2011 indicates that a total of 43% of the larger Spitalfields & Banglatown Ward identify as either ‘White British’ or ‘White Other’. 41% of the same ward identify as ‘Bangladeshi/Bengali’. 5% identify as black and 9% in the other categories. So it can be said that the profile of the people responding to the Forum survey very closely corresponds to the profile indicated by national statistics and the public consultation exercise using Commonplace (online and on paper) can be said to be very representative of the people who live in the area. Further information about the Commonplace survey and the data can be seen in Appendix C.

### **Results of the consultation process**

- 1.36 After the end of our consultation period in March 2018, the Forum spent the six months or so analysing all the data it had received. It was possible to pick out the positive and negative comments from the online survey.
- 1.37 The top negative comments were from people who said the neighbourhood or parts of it were (or were felt by them to be) dirty, dangerous, unwelcoming or poorly maintained.
- 1.38 The top positive comments about the neighbourhood said it, or parts of it, were historic, welcoming, attractive, a good place to visit to go out, eat or shop, a good place to live and a good place to work.
- 1.39 The top recommended improvements were about reducing antisocial behaviour, traffic calming measures and improving street cleaning and rubbish collecting. The Forum felt that these things were not matters a neighbourhood plan could directly address through policy – it is not possible to control when bins are emptied, to reorganise traffic directions or speed restrictions, monitor CCTV or direct police resources. The Forum was also mindful of the emerging Tower Hamlets Local Plan which would be making some changes in these areas, the bringing ‘in house’ of public refuse collections by THBC and the Liveable Streets project also led by THBC designed to improve the streets, reduce anti-social behaviour and calm traffic. However, the Forum still considered it important to make representations to higher authorities about these matters in its role as representing the interests of local people.
- 1.40 Moving down the list, the next most recommended improvements were areas where the forum thought it could make a real difference. They were chiefly concerning improving roads and pavements, protecting heritage and improving open space.
- 1.41 The Forum blended into this process the data from the in-depth stakeholder consultations and this further reinforced the importance of some of these areas of improvement, particularly regarding the heritage of the area. Numerous stakeholders also raised the growing concerns of small and micro local businesses concerning increasingly high rents and the costs of doing business.

- 1.42 All of this material was distilled through a process of identifying key words and giving them relevant weight and priority according to the frequency and intensity they were raised in the two forms of consultation. This process resulted in the drafting of a 'Vision for Spitalfields' in late 2018. The vision was further refined and during 2019 three core and 'achievable' objectives were developed which we felt most closely represented the sum of data we had received.
- 1.43 These three objectives were:
- to improve the environment by providing as much greenery as possible in this deeply urban area;
  - to protect and enhance the historic built environment; and
  - to maintain the special and diverse business mix that has settled in the area whilst maximising the employment opportunities that result from the neighbourhood's prime location and to support the small scale creative and artisan businesses that have always been part of the Spitalfields story.

### **Development of the Neighbourhood Plan policies and evidence**

- 1.44 Throughout the rest of 2019, three 'policy working groups' were established to research ways the Forum could achieve those core objectives. The policy working groups (business mix, urban heritage and green spaces) looked more closely at the data and in particular a report the Forum had commissioned which analysed the survey data geographically to identify areas of most interest or concern. The working groups also reached out to expert organisations such as the Spitalfields Historic Buildings Trust, key local business stakeholders and the East End Trades Guild to gather additional evidence to support and justify particular policies that were designed to achieve the core objectives, realise the Vision for Spitalfields and meet the unique needs of Spitalfields in the 21st century.
- 1.45 In late 2019, the Forum Council engaged with Navigus Planning for their assistance and guidance in drafting a neighbourhood plan document. The Forum was aware that Navigus were involved in supporting another neighbourhood forum elsewhere in Tower Hamlets and therefore considered choosing Navigus a sensible option as they would be familiar with the borough and THBC officers.
- 1.46 The policy working groups then worked closely with Navigus Planning during early 2020 to determine how the objectives would be delivered through planning policy. Separate meetings were held between members of the Forum Council representing business, resident and local organisation interests in all the key objective areas until the policies for environment, business mix and urban heritage were agreed.
- 1.47 Further expert advice was brought in to assist the heritage working group. Dan Cruickshank and Alec Forshaw undertook a detailed survey of the neighbourhood area to support our urban heritage policies.
- 1.48 Expert advice was also sought by the environment/green working group. The biodiversity officer at THBC contributed his views on a range of biodiversity initiatives being considered. The Liveable Streets team were approached for their input. Other local groups such as Spitalfields Open Space and the Attlee Youth & Community Centre were asked for their help in providing further



justification for the inclusion of Christ Church Gardens and the Chicksand Street Ghat (respectively) as Local Green Spaces.

- 1.49 The East End Trades Guild shared its own research with the Forum Council to support the policies designed to support our business mix. The East End Trades Guild through its representatives, justified, wrote and agreed the wording of the business mix policies in dialogue with other sectors of the community represented on the Forum Council.
- 1.50 At a Forum Council meeting on 12 June 2020 all the policies in the pre-submission draft plan were agreed and the document was shared with officers in the Strategic Planning Department at THBC for their informal comments and feedback.
- 1.51 The draft Spitalfields Neighbourhood Plan was amended following feedback from THBC and the final version of the draft document was recommended to the members of the Forum who voted to recommend it proceed to Regulation 14 Consultation on 15 July 2020.

### **Strategic Environmental Assessment**

- 1.52 In June 2020, when the draft SNP was submitted to THBC for informal comment, a request was made for a screening opinion on the need for a Strategic Environmental Assessment (SEA). Following amendments made to the Plan ready for Regulation 14 Consultation, the screening assessment was undertaken by THBC who consulted the appropriate statutory bodies (Environment Agency, Natural England and Historic England). In light of this, the assessment concluded that the draft SNP was not likely to have a significant impact on the environment, therefore an SEA was not needed. The Screening Report by THBC is included as part of the supporting evidence base to the Plan.
- 1.53 Following Regulation 14 Consultation, minor amendments were made to the Plan. No new policies were added and there were no material changes to policies such that this would change the overall outcome of the screening opinion.

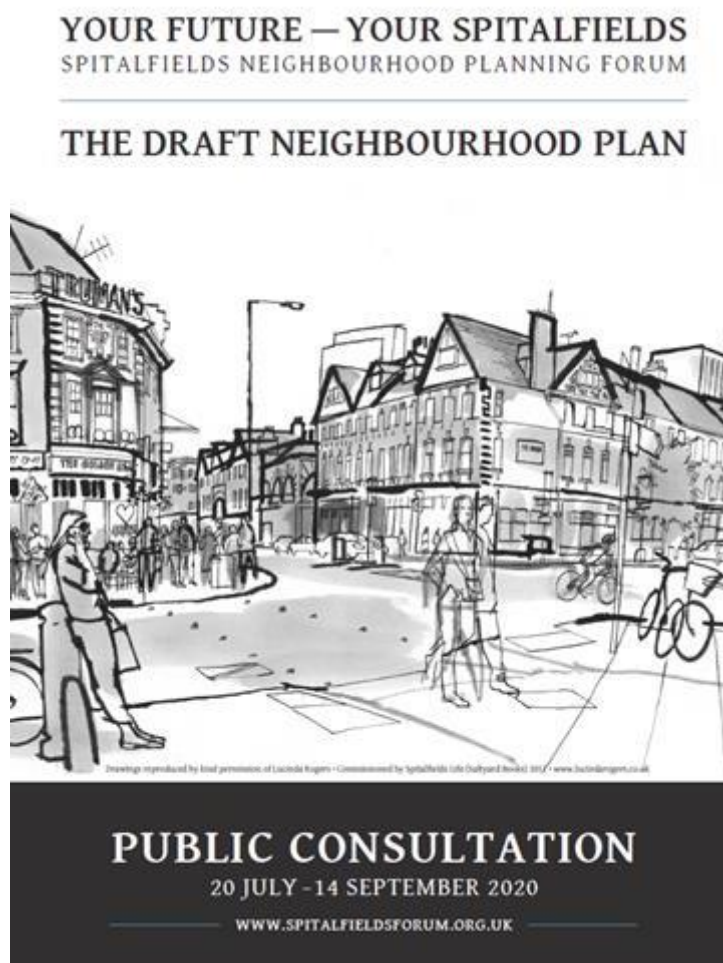
### **Habitats Regulations Assessment**

- 1.54 At the same time as the SEA screening was requested and subsequently undertaken, the same screening process was carried out on the need for a Habitats Regulations Assessment (HRA). This was undertaken by THBC who consulted the appropriate statutory body (Natural England). In light of this, the assessment concluded that the draft SNP was not likely to have a significant impact on European protected species or sites, therefore an HRA was not needed. The Screening Report by THBC is included as part of the supporting evidence base to the Plan.

## 2 REGULATION 14 (PRE-SUBMISSION) CONSULTATION

- 2.1 Regulation 14 (Pre-Submission) Consultation was undertaken between 20<sup>th</sup> July and 14<sup>th</sup> September 2020. Leaflets publicising the consultation and summarising the key issues were hand-delivered to every address in the Neighbourhood Area. This information and the plan document were also presented on the Spitalfields Neighbourhood Forum website.

### Publicity leaflet advertising the Neighbourhood Plan Pre-Submission Consultation



- 2.2 A separate survey was conducted using Survey Monkey focussing on some specific public realm improvement proposals. This was sent out using local resident group email lists. The intention was to confirm or otherwise the public realm items in the proposed CIL spending list.
- 2.3 The statutory bodies were informed of the consultation either by email or letter. The list of statutory bodies was as follows:
- London Borough of Tower Hamlets
  - Mayor of London
  - City of London
  - London Borough of Hackney

- Coal Authority
- Ministry of Housing, Communities and Local Government
- Natural England
- Environment Agency
- Historic England
- Network Rail
- Transport for London
- Marine Management Organisation
- NHS
- Central London Clinical Commissioning Group
- National Grid
- UK Power Networks
- Thames Water
- Metropolitan Police
- Local ward councillors for wards covered by the Neighbourhood Area and surrounding wards

2.4 In addition, a range of other bodies were written to. These included the emergency services, the Canal and River Trust, the British Bangladeshi Chamber of Commerce, the Society for the Preservation of Ancient Buildings, the East End Trades Guild, the Spitalfields Parochial Church Council and the Spitalfields Society. A host of local business and major landowners were written to, including the Truman Brewery, Old Spitalfields Market and British Land.

2.5 Each of the owners of sites or buildings proposed as Non-Designated Heritage Assets was written to at the address in question. All of the owners of the Local Green Spaces were also written to.

### **Summary of representations**

2.6 In total, representations were received from 38 residents, 3 businesses, 13 local stakeholder bodies and 9 statutory consultees. In addition, 38 residents took part in the public realm survey.

2.7 The representations from statutory consultees can be summarised as follows:

1. City of London Corporation - did not oppose and made recommendations.
2. Greater London Authority - support with recommendations.
3. Historic England - support with detailed recommendations on heritage policies, recommended re-wording of certain sections and advice about archaeology.
4. London Borough of Tower Hamlets - general support, however SPITAL6 not supported, other areas of recommendations. More evidence wanted for some Local Green Space designations. A more detailed summary of responses to each of LBTH's comments is shown in Appendix D to this Consultation Statement.

5. Marine Management Organisation - not applicable.
6. National Grid - no comment that materially affected the Plan.
7. Natural England – no comment.
8. Sport England - no comment that materially affected the Plan.
9. Transport for London - no comment that materially affected the Plan. Considered that Plan should say more about cycling.
10. Metropolitan Police Authority - do not oppose but considered that Plan should have policies to design out crime.

2.8 The representations from local stakeholders and property owners can be summarised as follows:

1. Attlee Youth & Community Centre - support SPITAL5 but wanted land they use to be designated as local green space.
2. East End Garden Society - support for SPITAL4, SPITAL5 and SPITAL6.
3. East End Trades Guild - support SPITAL7 but think this policy should go much further
4. Holland Estate Management Board - support for NDHA status for their buildings but recommended that Wheler House be added.
5. Huguenots of Spitalfields – support.
6. Owner of 46 Cheshire Street - oppose NDHA for their building but no specific justification provided.
7. Spitalfields Community Group – support.
8. Spitalfields Historic Buildings Trust - support but wanted SPITAL1 to be more restrictive, emphasised graffiti as a growing problem.
9. Spitalfields Open Space - support for green policies.
10. Spitalfields Small Business Association - support for SPITAL7.
11. Spitalfields Society - support with some minor recommendations, additions to NDHA list proposals, question utility of one sub clause on heritage appraisals.
12. St. George’s Residents Association - support Elder Gardens being given Local Green Space protection but noted complexity of management arrangements.
13. Swadinhata Trust – neutral, noted NDHA status for two Bengali heritage items but wanted more, provided detailed proposals for changes to traffic/roads in the area
14. Zeloof LLP - support but wanted one property removed from NDHA list, question use Appendix D and think SPITAL7 is too ambitious.

2.9 Three businesses made representations - one gave general support, a second praised SPITAL1 and the third recommended more pedestrianisation and improved waste management arrangements.

2.10 Of the 38 residents who responded, 35 lived in the neighbourhood area and 3 lived outside the area. All 35 residents who lived in the area supported the plan. 12 gave unqualified support and said they supported all the policies as they were. The remainder indicated their general support for

all policies but made particular recommendations about how the plan may be improved further in specific areas. Of the 3 residents who lived outside the area, all commented on the Neighbourhood Plan boundary - 2 said nothing about the plan but thought the boundaries should be adjusted in a small particular way to accommodate them, and one cited the boundaries as their reason for objection. This was the only declared objection to the plan made by any of the 63 respondents.

2.11 Of the issues raised a small number were significant enough to represent changes worthy of note:

- The relationship between SPITAL1 and Appendices A, B and D was unclear. Specifically, the status of the Character Area Appraisals (Appendix A) and the Non-Designated Heritage Assets (Appendix B) was not clear. This is important, given that both are referenced in SPITAL1. This was resolved by an explanatory paragraph being included in Section 1. This also clarified that the Assets of Historical Interest (Appendix D) were not specifically policy matters.
- Responses were not received from all the owners of the Local Green Spaces. In particular, the City of London Corporation, as owner of Elder Gardens, did not respond to the Regulation 14 consultation. They were chased after the consultation had closed and provided a response which confirmed their support for the Local Green Space designation.
- LBTH's objection to the wording of SPITAL6 was accepted and this was greatly simplified to address their concerns.

2.12 There was a sole objection to SPITAL7 by Zeloof LLP. This objection was to the requirement for a minimum 45% reduction in rents below the indicative market rate. Their proposal was that the figure should be amended to 35%. This was supported by a viability assessment. The Forum does not consider that the viability assessment is sufficient evidence to justify lowering the rate for the following reasons:

- The appraisal does not take proper account of the likely type of development in what is a very small area. Development that meets the needs of the market is unlikely to be solely office development, rather it will provide a wider range of more flexible workspaces.
- The assumptions used to inform the appraisal are not considered to be reasonable for the following reasons:
  - A rent-free/letting void of 2 years assumes full market rents are paid. By providing lettings at affordable rates, such voids are likely to be much lower.
  - Community Infrastructure Levy rates have been applied but there is no evidence about the assumed payments for each development typology. In Spitalfields, most developments will be refurbishments of existing buildings therefore the net addition of floorspace (and CIL charge) will be much lower than on a cleared site.
  - Finance at 7% is very high based on the long term trends for the cost of borrowing.
- The appraisal, based on the inputs presented, shows that the requirements of Local Plan Policy D.EMP2 are not viable. This policy requires a 10% discount on the indicative market rate. However, this policy is in an adopted plan which has been declared sound. This highlights how, at any given time in any given location, it can be shown that certain types of development may not be viable. Given the assumptions used, it is unsurprising that the appraisal will show development to be unviable. However, this is not considered to be sufficient to justify an



amendment to the discount rate. To reflect the subjective nature of such appraisals and general uncertainty that occurs over the lifetime of a plan, the policy states that the requirement is subject to viability appraisal, therefore it builds in the necessary flexibility.

- It is not clear why, if even a 10% discount rate is unviable, that the objector would be willing for the policy to require a 35% discount.

## **APPENDIX A      CONSULTATION REPORT BY GRACECHURCH CONSULTING**

Provided under separate cover

## **APPENDIX B      WORK OF CITIZENS UK**

### CITIZENS UK Report for Spitalfields Neighbourhood Planning Forum

#### Notes of verbal report given at meeting of 5<sup>th</sup> March 2018

#### **1.      Staffing Issue and Resolution**

Following the intervention from Emmanuel Gotorá to clarify the project with *Queen Mary University London* (QMUL), it became clear that the geography students had not received the survey form and therefore did not initially have the parameters for the survey. Students had met with Yasmin Akter, through our work with Tower Hamlets Citizens. Yasmin had given them training on community organising through the geography department which is something that is done at the beginning of every academic year. As the organiser for Tower Hamlets, Yasmin works with QMUL Geography lecturers, Stephen Taylor and Regan Koch. Hence the issue with the students not receiving the survey was quickly resolved through QMUL Geography who passed the link on to the students.

Emmanuel explained that the initial lack of communication in Yasmin's absence was due to the fact that her Out of Office may not have been set for people outside the organisation. However, once resolved, Emmanuel has been the main point of contact for SNPF and QMUL.

Afsana and Emmanuel then met with Toby to go through the project again and agreed a timeline and draft contract. Toby explained clearly that our remit was to target Bengalis/Asians as this demographic was largely missing from the survey. Emmanuel and Afsana contacted Stephen Taylor and were linked with 3 groups of students to do the surveys. We arranged two trips to East London Mosque to focus on the target demographic.

#### **2.      Intervention**

Understanding the remit of our involvement to be specifically Asian/Bengali, and, in addition to the surveys conducted by students, Emmanuel and Afsana and other CUK colleagues engaged with the following organisations:

1. Brick Lane Trust (spoke to Chairman, emailed surveys offering £5 vouchers)
2. Brick Lane Mosque (set up tables before/after Friday prayer for people to fill in surveys)
3. East London Mosque (set up tables before/after Friday prayer for people to fill in surveys + announcement inside mosque)
4. Mariam centre (Sister Circle)
5. ELATT Connected Learning (ESOL class)
6. Spitalfields Housing Association (emailed surveys offering £5 vouchers)
7. Spitalfields Small Business Association (spoke to Chairman and emailed surveys + link)
8. Christ Church School – (Paid visit to school & left paper surveys at reception)
9. Brick Lane Businesses – Jewish Wholesaler (2 surveys completed)
10. Osmani Trust (visited the Centre and sent link to survey as requested by them)
11. Canon Barnet School (Got in touch via Parent liaison officer)
12. Channel S (contacted Bengali TV station, awaiting response)

We also translated some of the text to Bangla and distributed posters to the organisations along with an English version. The Bangla text was sent to Toby in order that it go on the SNPF website (this is before we were put in touch with James)

### **3. Progress**

Progress was frustrating slow in the beginning of November when we first picked this up and towards the beginning of December when students had coursework deadlines.

That said, we were able to conduct and upload surveys to the Commonplaces site when we received information previously supplied to Yasmin. We think we are half-way to the target of 300 surveys agreed, but we can't assess how much traffic we sent via the online surveys.

### **4. Request for extension**

Considering the slow start to the new year, we requested an extension to the February half-term. We hoped that this would enable us to meet the target of 300.

### **5. Online vs. Paper – Observations**

While doing the paper survey takes twice the time, we've found this to be a more reliable way to get good responses as people don't always do this even when they promise to go online later. It seems like less people in the target community do things online and potentially prefer the face to face interaction. However, we recognise that face to face interaction also has its drawbacks as we are tagging this on to already busy activities within the life of institutions such as mosques, schools and housing associations

In addition, when we spoke to Bengali people, including professionals, who live in the area, and have done so for years, it was apparent that they didn't know anything about the development.

### **6. Survey Questions**

As we've mostly used the paper survey, there have been many comments about the lack of information about the survey on the form itself. People were expecting to see an introductory paragraph about the survey especially about how their responses will be used. Without it, people didn't find the map that useful, confusing even.

As we've taken information from the paper survey to upload onto the Commonplace website, we've found there to be conflicting responses to some of the questions, for example one might indicate in Question 3. that they are Positive (5) about the issue they are commenting on, but then go on to give reasons why in Question 4. And respond that that it is 'dirty', 'overcrowded,' etc. when we've asked.

### **7. Summary**

We have completed 240/300 surveys (still to upload 28).

We engaged with 11 organisations and did door-knocking on 3 estates.

Our learning from the survey is that door-knocking was more successful than other forms of engagement in terms of quality of information gathered and return for time spent. For example, the door-knock on the Shah-Jalal estate engaged with 30 of the 32 households there over a 3-hour

period. The conversations were of good quality and informative for the survey. However, door-knocking was hampered on larger estates mainly due to resistance to cold-calling, language barriers, and adverse weather conditions.

Mass engagement through TELCO member organisations such as ELATT, London Muslim Centre and other organisations such as Spitalfields Housing Association reached more people but due to the nature of the engagement, some of the conversations felt rushed, and the quality could have been better for the survey.

We also found that many people in the Bengali community were hearing about the survey for the first time and were not informed about it prior to engagement.

The sector that contributed least to our surveys was the business community though we engaged with SSBA for example.

The input of Queen Mary students was not utilised as well as it could have been due to the slippage of time and staff issues at CitizensUK. However, when the students did participate, they were brilliant in their interactions with different groups of people.

## **8. Membership of Tower Hamlets Citizens**

In addition to the surveys we are pleased to welcome *Spitalfields Neighbourhood Planning Forum* to membership of Tower Hamlets Citizens. We are 20+ organisations in Tower Hamlets, part of TELCO – 85 organisations across 5 East London boroughs.

We work together for the common good on issues which matter to our members such as – Living Wage; Affordable Housing; Living Rent; Refugees; Good jobs for local people.

We see the survey as the start of a longer-term relationship with SNPF. What happens after the survey also matters to many of our members, and we hope that we can work together on implementing some of the ideas coming from the surveys and wider project.

All our members benefit from being in relationship with each other in a broad-based alliance; we offer training and leadership development for change. We strongly believe that to change anything you need power. Our power lies in people and the institutions they are from – churches, mosques, schools, housing associations etc. SNPF is a unique institution in THCitizens and we are proud to welcome you into membership

As a member of the Tower Hamlets Citizens Leadership Group (Phil), I'm pleased to invite you to the Delegates Assembly on March 20<sup>th</sup> so you can meet the other organisation in your borough.

**Phil Warburton** (Tower Hamlets Citizens Leadership Group)  
**Emmanuel Gotora** (TELCO Lead Organiser)



## **APPENDIX C      COMMONPLACE SURVEY AND DATA**

Provided under separate cover

## APPENDIX D REGULATION 14 CONSULTATION REPRESENTATIONS BY LONDON BOROUGH OF TOWER HAMLETS

Representation	Response by Neighbourhood Forum	Amendment to Plan
<p>4. The exception to this is that the consultation draft has placed the policies after all their supporting text – it would be more conventional to include a brief contextual introduction before the policies, and then place the supporting text that justifies and explains the operation of the policy after the policy text itself.</p>	<p>Plans present this either way, i.e. justification then policy or vice versa. There is no material difference.</p>	<p>None</p>
<p>6. The status of the appendices needs to be made very clear, and it may be useful to include a clarifying paragraph in the introduction, and even to consider different terminology for different appendices</p>	<p>Agreed</p>	<p>Clarifying paragraph added to Introduction.</p>
<p>7. In this neighbourhood plan there seems to be two appendices that are intended to act as part of planning policy, and two that are meant to act as additional evidence. To avoid confusion, it may therefore be useful to move Appendices C and D to a separate ‘evidence base’ document when the plan is submitted for Regulation 16 consultation.</p>	<p>If clarity is provided in the Introduction, this the removal of certain appendices is unnecessary.</p>	<p>Clarification provided in Section 1.</p>
<p>9. It would be useful if a similar level of clarity could be provided on Appendix A – for example, there are statements in the appendix regarding the need for protection or preservation of certain character elements of the area. If there is also intended to be a presumption in favour of preserving these elements, this could be set out more clearly – at the moment, the appendix seems to sit uncertainly between description and policy guidance.</p>	<p>The Local Character Area Assessments in Appendix A are different to NDHAs in that they provide guidance on how to interpret the local character of the area when designing new development. In this regard they provide guidance that needs to be taken into account by the applicant. SPITAL1 is clear as to how that should be interpreted. It may be helpful to signpost that the LCAAs are provided in Appendix A – this could be done by way of a footnote to clause D.</p>	<p>Add a footnote to clause D of SPITAL1 to make clear that the LCAAs are in Appendix A.</p>

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<b>Representation</b>	<b>Response by Neighbourhood Forum</b>	<b>Amendment to Plan</b>
<p>10. Clauses B and I in SPITAL1 also reference the policies map – however, the policies map does not actually show the character areas or the heritage assets, as stated in the policy.</p>	<p>Noted</p>	<p>Amend SPITAL1 to refer to Figure 4.1 and the maps in Appendix B, rather than the Policies Map.</p>
<p>11. Paragraph 4.16 still poses some concerns. The paragraph rightly identifies that development outside the neighbourhood area could impact on the setting of heritage assets within the neighbourhood area, but then seems to imply that policies in the neighbourhood plan could therefore be applied to development outside the neighbourhood area boundary. This is not the case – the neighbourhood plan can only set policy within its neighbourhood area boundary. However, it seems that the character area guidance from Appendix A would be a relevant consideration when deciding whether a development adjacent to the neighbourhood area affects the setting of any identified heritage asset that falls within that character area. We suggest a re-write of this paragraph along the following lines: 'The Local Plan and the NPPF recognise the importance of the setting of heritage assets, and the character area guidance included in Appendix A provides important context for understanding the setting of heritage assets within the neighbourhood area. When decisions are made on proposals located outside the neighbourhood area, but which are identified as potentially impacting the setting of heritage assets within the neighbourhood area, the character area guidance should be a relevant consideration in understanding the setting of the heritage asset.'</p>	<p>Noted and agreed</p>	<p>Para 4.16 to be amended as suggested</p>
<p>12. On paragraph 4.27, the Community Safety team have noted that a balance needs to be struck between the effects that metal shutters have on the character of the area, and the</p>	<p>Agreed.</p>	<p>Paragraph 4.27 amended regarding shutters.</p>

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<b>Representation</b>	<b>Response by Neighbourhood Forum</b>	<b>Amendment to Plan</b>
<p>additional security they provide against burglary and vandalism.</p> <p>They have also noted that in policy SPITAL3 clause C, the reinstatement of alleyways and passageways should take place only where it can be demonstrated that this will not increase the risk of crime.</p>	<p>Agreed.</p>	<p>SPITAL3C amended to reflect risk of crime.</p>
<p>13. We are generally supportive of the content of Appendix A. There are a lot of references to views of Christ Church over the tops of and between buildings, and while it is recognised that all of these hold some importance, it may not be realistic to expect all of them to be preserved without unduly holding back development in the area. There are also a number of references to street art, and it may be appropriate to provide more guidance on where street art would be appropriate or not – without further guidance, the statements about street art enhancing the character of the area could encourage a more indiscriminate approach that could inadvertently have the opposite effect.</p>	<p>Agreed.</p>	<p>Paragraph added to Section 4 and specific references to street art in Appendix A removed.</p>
<p>14. Heritage officers have praised Appendix B for including a significant amount of research, and think it constitutes a useful resource. However, the comment on current planning proposals in entry 11 seems inappropriate, and will date a document that is intended to last several years. And for entry 21, the only significant element mentioned is the panelled interior – but it should be noted that the protection of interiors requires the whole building to be listed. The proposed neighbourhood plan policies would provide some level of protection of the building as a whole, but the only way to control changes to the interiors through planning would be full listed building status.</p>	<p>Agreed.</p>	<p>Amendments made to Appendix B as suggested.</p>

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15. It would be useful for Appendix B to contain maps showing only the heritage assets included in Appendix B, rather than also including those from Appendix D, to avoid confusion. Similar maps could then be produced for Appendix D, showing only the heritage elements identified in that appendix.	Agreed	Maps in Appendix B to be amended and new maps to be added to Appendix D.
16. <b>Similarly, Appendix D is considered a useful catalogue of heritage assets in the area. We have the following observations on some entries:</b> ....	Agreed.	Amendments made to Appendix D as suggested.
17. It would be useful to include some more detailed information in the supporting text about how the policy operates – this could be taken from paragraph 8.5.6 of the new London Plan. Although this would potentially be a duplication of the London Plan text, this is felt to be acceptable as the UGF is a new policy approach in Tower Hamlets, and the inclusion of some additional explanatory text would assist readers of the neighbourhood plan.	Agreed	Additional text added to Section 5.
18. The last sentence in clause B of this policy says that off-site provision of urban greening 'should firstly address the urban greening projects identified in Section 5'. This is assumed to relate to the CIL project tables in what is now section 7 of the plan. We would suggest a slight re-wording here to read 'For off-site provision, the projects identified in section 7 should be a priority'. As currently worded, the text suggests an obligation to deliver the CIL priority projects first – the suggested re-wording is to account for times when this may not be possible due to ownership or other constraints, and to allow applicants to then look at alternatives.	The list of projects is in Table 5.1 so it would be clearer to identify this table. Also, this table does not refer to CIL, therefore the suggested amendment is not necessary.	Amend SPITAL4(B) to refer to Table 5.1 rather than Section 5.
19. Elder Gardens - while this site clearly has some use as a tranquil space in a busy area, its primary role seems to be as an	The City of London Corporation was chased up and confirmed that it is supportive of the LGS designation.	Amend Appendix C to enhance justification.



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amenity area for a private housing development. Before supporting this designation, we would want to know the opinion of the landowner; and we feel more evidence is needed that the site is demonstrably special to the community or holds particular local significance.	The residents' group of the private housing development also support the designation. Elder Gardens is open to the public all day except after a certain time in the evening when it is residents-only to avoid anti-social behaviour.	
19. Christ Church Gardens – we would want to see some evidence of engagement with the church and to understand their position before fully supporting this proposal.	The church has not responded, despite writing to the rectory, the PCC and the diocese separately at Reg 14. The rectory did engage with the Forum during the stakeholder consultation process back in 2017-2018 but the churchyard was not discussed. The PCC discussed the neighbourhood plan and decided they would not get involved in neighbourhood planning matters. There has been strong support for LGS designation from resident and stakeholder groups.	None
19. Christ Church Gardens – On page 97, in the appendix, we would suggest deleting the final three paragraphs, from “In 2012 formal legal warning was issued...” to “making way for restoration of the Public Open Space”. The legal issues discussed here have now been settled, and the Council agrees with the restoration of the land as open space.	Noted and agreed	P97 text amended.
<b>19. Chicksand Street Ghat – more evidence of this significance would help a plan examiner to reach a decision on the designation. While we have no objection to the site being designated as a Local Green Space, we would like to have an idea of the consultation response to this proposal before actively supporting it.</b>	The owners are LBTH and they indicated they have no objection to LGS designation.	None
20. For figure 5.2 on page 27, it may be useful for the map key to use letters a-e, as these correspond with the lettering in policy SPITAL5.	Agreed	Figure 5.2 amended
21. Policy SPITAL6 on the Council-owned 'Ram and Magpie' site is considered unnecessary. The first clause of the policy is	Agreed.	Policy SPITAL6 and supporting text amended.

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<p>read as aiming to 'allocate' the site as an open space specifically related to the activities of the city farm and the nursery that is currently on-site. However, the site is already allocated as a publicly accessible open space on the Local Plan policy map, and we do not believe it is appropriate to try to designate a specific use for an open space.</p> <p>The second clause of the policy then also seems to recognise the possibility for another use on the site, which could potentially conflict with the first clause requiring it to be allocated as an open space specifically for the farm and nursery. The existing nursery building on the site is also in poor condition and has significant operational limitations, and it is considered that adding further layers of policy protection to the site may constrain options for improvements.</p>		
<p>23. Officers have concerns on the feasibility of some of the individual items.</p> <p>...</p> <p>The consultation summary submitted at Regulation 16 stage should clearly demonstrate what consultation has taken place over these proposals in order to demonstrate that they have significant community support.</p>	<p>The specific points are noted, as is the need for the Consultation Statement to describe the consultation process.</p>	<p>Various detailed amendments made.</p>
<p>24. It is unnecessary to include the same tables at the end of the heritage and open space chapters and in their own chapter at section 7 – they only need to be included once.</p>	<p>Agreed</p>	<p>Table 7.1 deleted</p>

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