

Spitalfields Neighbourhood Plan – Regulation 16 Consultation Representations

The Regulation 16 consultation on the Spitalfields Neighbourhood Plan was held between 7 January and 18 February 2021. The text of the representations received can be seen below. Due to difficulties with document accessibility, we have not been able to present the representations in their original form, but have copied the text from emails and pdfs into the table below. Information such as personal email and postal addresses have not been included in the table. Representations are presented in the order they were received by the Council. At the end of the document is a table of representations received via the Council's online Let's Talk consultation platform. Appendices provided by Zeloof LLP and Truman Estates Ltd and the consultation response from the London Borough of Tower Hamlets are provided separately on the Council's website at

https://www.towerhamlets.gov.uk/lgnl/planning_and_building_control/planning_policy_guidance/neighbourhood_planning/Spitalfields.aspx.

Sport England

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Thames Water

Dear Sir / Madam

Thames Water are the statutory water and sewerage undertaker for the Borough and are hence a **“specific consultation body”** in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

General Comments

New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the Revised National Planning Policy Framework (NPPF), February 2019, states: **“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”**

Paragraph 28 relates to non-strategic policies and states: **“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”**

Paragraph 26 of the revised NPPF goes on to state: **“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary.”**

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that: **“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).**

New Charging Schedule

For information, the way water and wastewater infrastructure will be delivered has changed. From the 1st April 2018 all off site water and wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Strategic water and wastewater infrastructure requirements will be funded through water companies’ investment programmes which are based on a 5 year cycle known as the Asset Management Plan process. It is important not to underestimate the time required to deliver necessary infrastructure. For example to understand, design, and deliver local network upgrades

	<p>can take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works extension or new treatment works could take up to 10 years.</p> <p>Infrastructure Requirements</p> <p>In light of the changes which took effect in April 2018, and which are set out above, we would request that a paragraph is included in the Neighbourhood Plan which states:</p> <p><i>“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.</i></p> <p><i>Thames Water encourages developers to use their free pre-planning service https://www.thameswater.co.uk/preplanning). This service can tell developers at an early stage if there will be capacity in Thames water and/or wastewater networks to serve their development, or what they will do if there is not.</i></p> <p><i>The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes.”</i></p> <p>We hope these comments are of assistance if you would like to discuss further please do not hesitate to contact Stefania Petrosino at the above number.</p>
<p>Natural England</p>	<p>Dear Mr Heywood</p> <p>Spitalfields Neighbourhood Plan – REG 16</p> <p>Thank you for your consultation request on the above dated 7th January 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>

	<p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>For any further consultations on your plan, please contact: consultations@naturalengland.org.uk</p>
<p>Spitalfields Neighbourhood Forum</p>	<p>Dear Sir</p> <p>6 February 2021</p> <p>This is a formal representation made by Spitalfields Neighbourhood Planning Forum to the Regulation 16 public consultation by the London Borough of Tower Hamlets on the Spitalfields Neighbourhood Plan.</p> <ol style="list-style-type: none"> 1. The Spitalfields Neighbourhood Forum wishes to make the following representations on two specific matters in the Spitalfields Neighbourhood Plan Regulation 16 Consultation Version. One relates to an error in the drafting of the Plan which failed to pick up an amendment to national planning policy. The other relates to an update to the emerging development plan framework in respect of the London Plan. 2. The drafting error concerns the amendment to the Use Classes Order in September 2020 which created a new use class E (commercial, business and service uses). This resulted in the reclassification of a number of use classes, other than for certain change of use permitted development rights until 31 July 2021. One such use class that was reclassified as class E was class B1 (business). 3. The Regulation 16 version of the Spitalfields Neighbourhood Plan makes two references to B1 uses in respect of ‘facilitating urban greening’. In order that the Plan conforms with national planning policy, it is proposed that the following amendments are made (text that is struck through is proposed for deletion and text underlined is proposed to be added): <p>Paragraph 5.9:</p> <p><i>5.9 The draft London Plan has devised an ‘Urban Greening Factor’ (UGF) model⁶, to assist plan makers and developers in determining the appropriate provision of urban greening for new developments. The factors making up the UGF are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy</i></p>

to provide a range of benefits such as improved health, climate change adaptation and biodiversity conservation. A UGF score for a new development will be between 0 (worst) and 1 (best). In the absence of a target in a lower tier plan, draft London Plan Policy G5 (Urban greening) proposes a UGF score of 0.4 for predominantly residential development and 0.3 for predominantly ~~B1 commercial~~ business development (offices and light industrial). This only applies to major developments⁷. Bespoke approaches are encouraged although the Local Plan does not include its own UGF.

Policy SPITAL4(B):

B. All major residential development proposals must seek to achieve an Urban Greening Factor (UGF) score of at least 0.4 and all major ~~Class B1 commercial~~ business schemes a UGF score of at least 0.3. Where it is demonstrably not reasonably and practically possible to achieve the relevant score, provision towards off-site urban greening will be required. Such provision should firstly address the urban greening projects identified in Table 5.1.

4. The second matter concerns the fact that, since the Submission Version of the Spitalfields Neighbourhood Plan was submitted to London Borough of Tower Hamlets at Regulation 15, the Mayor of London sent the Secretary of State the Publication London Plan (December 2020). Subsequently in January 2021 the Secretary of State has confirmed that he is content for the new London Plan to be formally published with no further changes. Whilst the new London Plan has yet to be adopted, certain references to the draft London Plan contained in the Spitalfields Neighbourhood Plan need to be amended. These are as follows:

Paragraph 4.5:

- *The ~~Intend to Publish~~ Publication version of the London Plan (~~2019~~ 2020).*

Footnote no. 6:

See '~~Intend to Publish~~' Publication version of the draft London Plan, pp.~~364-368~~ 367-371

5. It should be noted that the above is not an exhaustive list as certain references are to specific notations and text in the adopted London Plan 2016 which remains part of the development plan until such time as the Publication London Plan 2020 is formally adopted. Principally this relates to references in paragraph 2.20 of the Spitalfields Neighbourhood Plan.

Please be kind enough to acknowledge receipt of this representation

<p>Kate Brown (Urbiana)</p>	<p>Dear Sirs,</p> <p>Urbiana endorses the rent discount on 'affordable workspaces' in new major developments should quadruple to 45% off (the current discount of only 10% off market rent in the Tower Hamlets Local Development Plan is completely unreasonable).</p> <p>This rent reduction of 45% will help keep the diversity of independent businesses and employment for which Spitalfields is well known.</p> <p>Failure to do so will kill many small businesses altogether.</p>
<p>Canal and River Trust</p>	<p>Dear Plan Making Team</p> <p>Spitalfields Neighbourhood Plan: Regulation 16 Consultation.</p> <p>Thank you for consulting the Trust on the above plan.</p> <p>Given the distance of the plan area from our assets I can confirm that we have no comments to make on the Spitalfields Neighbourhood Plan.</p>
<p>Transport for London (Regulation 16 response)</p>	<p>Thank you for consulting Transport for London (TfL). We responded to the Regulation 14 consultation in September 2020 and I have attached that response. It is disappointing that our suggestions for additional references to and support for improved connectivity, car free development, Vision Zero, expansion of cycle hire and better management of deliveries and servicing have not been reflected in the submission draft. Although a brief mention has been added to the end of section 5.5 to the Mayor of London's 'Healthy Streets' concept, this falls short of the clear endorsement of the Healthy Streets Approach that we were hoping to see included.</p> <p>We hope that these issues can be addressed before the Neighbourhood Plan is finalised and look forward to seeing them reflected in the final version</p>
<p>Transport for London (Regulation 14 response)</p>	<p>Dear James</p> <p>Thank you for giving Transport for London (TfL) the opportunity to comment on the pre-submission draft of Spitalfields Neighbourhood Plan. Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The</p>

comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA).

TfL has a direct interest in the area due to the presence of surface and sub-surface rail infrastructure as well as sections of the Transport for London Road Network (TLRN) which are important bus routes. The draft Plan recognises that surface rail infrastructure can provide a barrier to movement or boundaries that define a character area. If any emerging projects or proposals affecting operational transport infrastructure are raised through the consultation process, TfL would be keen to discuss them at the earliest opportunity. However, TfL is no longer the owner of any of the disused rail structures associated with the former Shoreditch station which are included in the list of assets of historical interest in appendix D.

We note that the draft Plan has a number of objectives and is focused on a discrete range of topics. There are only a few references to transport, active travel, connectivity or public realm improvements. While we appreciate that transport and movement is not one of the main concerns of the Neighbourhood Plan, the inclusion of policies or projects that could improve connectivity, enhance the public realm and reduce the negative impact of vehicles would be complementary to policies on built heritage, the environment and open space. The overall aim should be to enable safe movement on foot and cycle or by public transport within the Neighbourhood Area. We would encourage the Neighbourhood Plan to adopt a requirement for car free development for all land uses including offices, industrial and residential. This will help to support a reduction in vehicle dominance which can act as a barrier to walking and cycling and impact on the reliability and journey times of bus services. Endorsement of the Mayor of London's Healthy Streets approach and Vision Zero (road safety) would also be appropriate and consistent with the Neighbourhood Plan's aims.

TfL would welcome references to enhanced cycle hire provision in the area which helps to support movement in and out of the Neighbourhood Area. TfL is keen to install additional cycle hire stations to the north of the Neighbourhood Area to cater for existing demand and future growth arising from development of the Bishopsgate Goods Yard site. The Neighbourhood Plan could also ensure that street furniture and kiosks are located so that they do not impede safe movement on foot or cycle, particularly on designated routes or desire lines.

The draft Plan recognises the importance of micro-businesses to the economy and character of the Neighbourhood Area. To support these businesses and to minimise environmental impacts, TfL would be keen for the Plan to put forward proposals to better manage deliveries and servicing. This could be achieved by coordination between local businesses and local micro-consolidation of freight as well as through the use of active travel modes e.g. cargo bikes or electric vehicles for the last stage of deliveries or first stage of collection.

We hope that these comments are useful and we look forward to reviewing the submission version of the Neighbourhood Plan.

<p>Quaker Street Cafe</p>	<p>Dear Sirs,</p> <p>Quaker Street Cafe endorses the rent discount on ‘affordable workspaces’ in new major developments should quadruple to 45% off (the current discount of only 10% off market rent in the Tower Hamlets Local Development Plan is completely unreasonable).</p> <p>This rent reduction of 45% will help keep the diversity of independent businesses and employment for which Spitalfields is well known.</p> <p>Failure to do so will kill many small businesses altogether.</p>
<p>Toni Meredew</p>	<p>Hello</p> <p>I can't see the plans because don't have the tech but I want to:</p> <ul style="list-style-type: none"> -keep the heritage buildings that are left in the area -Maintain or increase levels of greened public space -Put in place orders to stop the felling of trees as new saplings are no substitute - Stop any further high level building planned as they ruin the look and -create more affordable housing and affordable workspace for local artisan Thank you
<p>Stephanie Mathern</p>	<p>I'm writing to give my full support of the Spitalfields Neighbourhood Plan that was submitted to yourselves.</p> <p>I am particularly in favour of the policies that will protect and enhance our park (we only have one!) and minimal green spaces. These are essential for residents , workers and tourists alike. We have the smallest area of green space of any borough in Greater London , and it is particularly devoid in the spitalfields area.</p> <p>I also support new development greening requirements- every little bit of green will help our urban, over polluted environment.</p>
<p>Historic England</p>	<p>Dear Neighbourhood Planning Team</p> <p>Draft Spitalfields Neighbourhood Development Plan - Regulation 16 Consultation</p> <p>Thank you for consulting Historic England on the above document.</p>

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the development plan process.

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England's remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed plan for designated and undesignated heritage assets. Accordingly we welcome the opportunity to comment on the above consultation document. It should be noted that our comments are provided in the context of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) and Historic England's Good Practice Advice (GPA) and Historic Environment Advice Note (particularly HEAN 11 : Neighbourhood Planning <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>)

Much of the plan area is designated conservation area and it encompasses a high number of designated heritage assets, including scheduled ancient monuments and grade 1 listed buildings, and is an area of arguably international significance in respect of its social history. It is also an area which has seen very rapid change and, like Covent Garden, was a key location in the emerging struggle for the recognition and protection of London's historic environment from the late 1960's (The Founier Street and Brick Lane conservation area was designated in 1969). The competing demands of business and visitors and the inner London communities within the area have resulted not only a vibrant and adaptable economy but also significant pressures and a varied pattern of benefits. This is reflected in inclusion of heritage assets on the register of heritage assets at risk, included the Wentworth Street conservation area. Additionally, the area is already subject to a substantial an additional planning guidance and policy as set out in the City Fringe Opportunity Area Planning Framework (2016) which places an emphasis on supporting small enterprises and creative industries.

Historic England provided a detailed response to the Regulation 14 Consultation to the Spitalfields Neighbourhood Forum on 28 August 2020. Given the historic importance of the area and its complexity in terms of use and the pressures and opportunities generated by its proximity to the City we are of course pleased to note the strong emphasis placed on local historic and architectural character within the proposed Plan.

General observations

In our previous advice to the Forum our key observations were in respect of strengthening the clarity of the significance of undesignated heritage assets, the potential for known and unknown archaeological assets, and the potential for the plan to target heritage assets "at risk" and encourage their enhancement. We are pleased to note the current draft plan has adopted most of the

recommendations and as such we do not consider it necessary to comment at length. We can however offer the following observations and recommendations which we will hope will help in assessing the current Draft Plan.

The proposed plan sets out a clear set of public realm improvements which would benefit both residents and visitors. It also identifies the need for green space and a creative approach to providing pocket parks and additional planting which are sorely lacking within the area. We consider the Plan as proposed will have a beneficial impact on the historic environment and as such sets out a positive strategy for its conservation and enhancement.

We previously advised it would be helpful to set out more clearly the role of Appendices B and D. The identification of those elements of the local environment which contribute positively to creating a sense of place and to the quality of the environment is a legitimate function of neighbourhood plan-making and provides an

opportunity to promote locally focused policies to secure and strengthen the benefits they provide. We recommended, in accordance with NPPF Policy 197 which requires their significance to be taken into account in decision making, that it would be beneficial to clarify the assessment process for inclusion in the list of undesignated heritage assets at Appendix B. The current Plan makes this relationship much clearer and provides a short analysis of the significance of each asset and its reason for inclusion. We would however encourage the Forum to publish the criteria and process applied in identifying these assets. This would create robust evidence for the justification for inclusion and enable future consideration of additions or removals in the event of the Plan being made and subsequently reviewed. To be clear we consider the proposed list to be robust in its selection, but this can be strengthened by demonstrating a clear methodology for compilation.

We would recommend the Forum consider taking a similar approach to the local views identified in local character area analysis and set out visually their analysis or via map-based resources to help strengthen the policies protecting specific views.

A number of designated heritage assets within the Draft Plan area are included in the 2019 Heritage at Risk Register published by Historic England on information provided by the local authority, this includes the Wentworth Street Conservation Area. The NPPF sets out a requirement for local planning authorities to set out a positive strategy for the historic environment and to target those heritage assets at most risk from neglect and decay. We previously recommend that the condition of the area was highlighted in the character area assessment and encouraged the Forum to consider how policies might help to improve the condition and the quality of the environment within this sub-area. While the proposed Plan will, in our view, benefit the historic environment overall, we would recommend that the at "at risk" status of assets is formerly recognised alongside the desirability of addressing the principal causes of this. We would therefore continue to encourage the identification of those

	<p>assets at risk and the promotion of opportunities to address risk either through refurbishment or enhancements of setting. Such aims could be identified in the list of heritage public realm enhancements set out in the proposed plan.</p> <p>Conclusion</p> <p>Historic England welcomes the proposed Spitalfields Neighbourhood Plan and the extensive work that has gone into its development. Our suggestions above are provided with the intention of ensuring the document provides a stronger vision for the plan area and its historic environment.</p> <p>If you wish to discuss any of the above issues please do not hesitate to contact me.</p> <p>It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment</p>
<p>Lee Sargent</p>	<p>Hi Neighbourhood planning,</p> <p>I am writing to inform you that I agree with the draft policy in the local plan for Spitalfields to help address the issue of keeping business premises affordable. This is vital which will keep small independant business's based in the borough. The policy is as below.</p> <p>POLICY SPITAL7: AFFORDABLE WORKSPACE As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</p>
<p>Ben Day</p>	<p>Dear Tower Hamlets</p> <p>I am writing as a local business owner and having previously had a shop on Hanbury street.</p> <p>I am writing to urge you to support the affordable rent policy with a rent reduction of 45% off market value to keep the vital mix of business in the area.</p> <p>With out your help the area will loose its diversity, local businesses that keep the money with in the area will disappear.</p>

	<p>The rents will only be affordable by big brands who have no interest in area.</p> <p>The shops will not actually be able to support the rents, only the brands prepared to make losses at certain sites will be able to rent the units.</p> <p>This will slowly kill the area, as has happened in countless other high streets up and down the country.</p> <p>Please support local business, keep our area interesting, mixed and alive.</p>
Paul Gardner	<p>Hi,</p> <p>I'm emailing to express my whole-hearted support for the affordable workspace plan put forward by the Spitalfields Neighbourhood Planning Forum, in particular their call for 45% rent discounts below standard market rates and protection of affordable spaces for at least 12 years.</p> <p>Having run a family business that was situated in Tower Hamlets for over 150 years, and leaving last year due to unaffordable rent increases, I think the amendments put forward by the Forum are crucial for allowing businesses to thrive in the borough. Most of my customers are small / independent shops in the area - rents and rates, especially in the context of COVID are making many businesses unviable. The current proposal of 10% rent discounts will not go far enough to protect many businesses from collapsing.</p> <p>Ideas put forward by the Forum as well as other community-led groups such as the East End Trades Guild give a truer picture of what's happening to shop-owners 'on the ground' and offer genuine, long-term solutions that will protect small businesses and Tower Hamlets' vibrant culture of independents.</p>
Cullinan Richards	<p>POLICY SPITAL7: AFFORDABLE WORKSPACE As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</p>
4Cose Ltd	<p>POLICY SPITAL7: AFFORDABLE WORKSPACE As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace</p>

	<p>for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</p>
<p>Sophie Parkin</p>	<p>To whom it may concern</p> <p>POLICY SPITAL7: AFFORDABLE WORKSPACE As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</p> <p>If this isn't implemented more small business will close and the area will turn into a ghost town like Long Acre and most of covent garden Soho. Empty of any heart. Post this pandemic so much will be empty making sure that some are filled by maintaining lower rents for specified times allowing business to build up seems the only sensible thing to do.</p> <p>Please let me know how this pans out. Im interested as a business in the area who has a great landlord in the Catholic church but not all commercial landlords are so long sighted. The Catholics have been in property for a long time!</p>
<p>Juliette (no surname given)</p>	<p>Independent businesses are the life blood of Tower Hamlets.</p> <p>Please ensure that they can thrive under the new Spitafields Development.</p> <p>The rent reduction should quadruple to 45% off for independent businesses.</p> <p>This big rent reduction will help keep the diversity of independent businesses and employment for which Spitalfields is well known.</p>
<p>Tony Bailey</p>	<p><i>Regarding POLICY SPITAL7: AFFORDABLE WORKSPACE As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</i></p>

	<p>This is your opportunity to ensure the area stays vibrant and diverse. Rent's should not be driven up but the large corporate businesses. Now more than ever small businesses should be given the opportunity to flourish and have the support of local authority. Landlords have enjoyed too much with rent hikes, allow the people to thrive.</p> <p>Your time to shine!</p>
<p>David Donoghue</p>	<p>I am responding to the council's consultation.</p> <p>I believe the Neighbourhood Plan proposed by the Spitalfields Neighbourhood Planning Forum is an exceptional piece of work that conforms to legal requirements but also enhances the preservation and sustainability of the area both from built environment and green environment perspectives.</p> <p>The work entailed a massive amount of research in terms of facts but also in outreaching to the whole community of diverse cultures and backgrounds to establish opinions on priorities, wants and needs.</p> <p>This has also been reflected in the enthusiastic make up of the Forum's membership, committee and officers.</p> <p>I therefore comment this plan.</p>
<p>Giles Barrett</p>	<p>Dear sir / madam,</p> <p>I'm writing in support of the proposed policy to provide for an affordable rate 45%. These are unprecedented times, and these kind of bold measures are essential if small businesses are to survive.</p> <p>POLICY SPITAL7: AFFORDABLE WORKSPACE As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</p>
<p>East End Trades Guild</p>	<p>To whom it may concern,</p>

I write on behalf of the East End Trades Guild. An alliance of more than 300 small businesses in East London with most of these located in Tower Hamlets.

The Guild was founded in 2012 at Christchurch in Spitalfields. After uncovering high rents as the most pressing issue to affect small independents in the area I worked with small businesses to launch an organisation which could bring them together for collective, effective and strategic action on common interests for the common good.

Since that time we have conducted two more listening campaigns for small businesses in the area one was during the pandemic and rent has remained the single most important issue to affect small businesses. We have also undertaken considerable research with our partners at the New Economics Foundation and Queen Mary University. Some of this research was funded by LBTH and the GLA.

The lack of affordable workspace in Spitalfields during the global pandemic has exacerbated the historic poverty of the area and will considerably hinder the economic recovery unless it is addressed. The road to recovery will be slow and the way we work and where we work is changing irrevocably.

The Affordable Workspace Policy for the Spitalfields Neighbourhood Plan does not go far enough to tackle the issue in the area which is already one of the poorest in the country and which has been decimated by the worst recession on record. I recognise the limitations of the planning framework and its ability to keep pace as an extremely slow and bureaucratic system. Therefore I feel that it may be the best policy we can achieve at this time and for this forum.

However, here are some additional areas that an affordable workspace policy might be able to address:

- The size and use classes of commercial units should be thought through in this policy to reflect the new demand of the area in light of the dramatically changed context due to the COVID-19 pandemic. The inclusion of B1(c), B2 and B8 use classes to maintain small scale traditional craft makers and creative small businesses such as galleries. Current trends show that many people who worked in offices that closed in March 2020 due to lockdown won't return, preferring the flexibility of homeworking.
- Different B1(c), B2 and B8 uses need to be made available to support the "small scale creative and artisan businesses that have always been part of the Spitalfields story" rather than the current orthodoxy of retail and office space in large developments. Prior to COVID-19 retail was already suffering and now we see global brands going into liquidation every single week. Allowing developers to wave through workspace led developments that focus on large office and retail space will be disastrous for the area. As opposed to building shiny tombs doomed to remain empty, new developments should be opening their doors to existing small local businesses currently under threat, and therefore meaningfully helping to retain the existing mix
- Affordable workspace at least 50% below the indicative market rate to be more in line with Hackney's definition of 'affordable.'

	<ul style="list-style-type: none"> - The words 'local' 'small' and 'micro' businesses should be included in relation to who affordable workspace is for to make sure larger global businesses do not replace the small businesses who are providing local employment - Preference should be given for small local businesses run by and/or providing opportunities for minority groups; young people, ethnic minorities, LGBTQ, working classes and women. Given that the SNPF business group is led by Tayo Abimbola whos family business was forced to close due to high rates and rents it would be a travesty if her labour and effort amidst all the barriers she has to face that affordable space is then distributed to those who can access it most easily - To truly fulfil the objectives of the Business Mix policy in retaining the existing mix - businesses who are producers of cultural, traditional heritage and crafts value and/or who've been operating in the boundary for more than 10 years such as the iconic Brick Lane Beigel Bake, Nazrul Curry House or InSpitalfields should also be prioritised
<p>Katharina Gruber</p>	<p>Dear Tower Hamlets Neighborhood PlanningTeam,</p> <p>The deciding factor that differentiates London's East End is its diversity. Tower Hamlets especially is home to a wide range of communities and this is exactly the reason why is is such a compelling and attractive destination for visitors from across London, the UK and further afield.</p> <p>To keep Shoreditch and surrounding areas' appeal, it's vital to support, maintain and even promote this diversity. One big aspect of this is the need for genuinely affordable workspaces that allow people from all backgrounds to flourish. We don't want Spiralfields to become another shopping district with mainstream shops that can be found in any shopping centre or high street. We want it to be full of independent businesses who represent the local community, provide local jobs. The pandemic has shown how much these businesses are being valued, not only for their excellent customer service, but also because they are able to adapt much quicker to consumer needs than big chains and because they care about their employees.</p> <p>Let's keep Spiralfields' character alive!</p> <p>I herewith express my full support for the following policy:</p> <p>POLICY SPITAL7: AFFORDABLE WORKSPACE As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</p>

Interxion

Dear Planning Team,

My name is Andrew Fray, UK Managing Director of Interxion: A Digital Realty Company ('Interxion'). Our company designs, builds and operates data centres globally. We have been operational and headquartered in the Old Truman Brewery in Brick Lane for over 20 years, where, in addition to being one of the most important centres for the UK's digital economy, we employ approximately 160 staff. Indeed, we are probably the Truman Brewery's largest single tenant. Recently we committed to remaining in the London Borough of Tower Hamlets and indeed within the Brewery for our offices until 2030 and for our three data centres until 2033. We currently occupy a number of pre-existing buildings/spaces within the Brewery and in 2019 completed two new buildings in Former Wilkes Street at our cost.

My employees are very aware of the special conserved nature of the Brewery and the wider immediate neighbourhood. Over past years, we have seen both drastic and sympathetic changes in the area and the paradox we see is the requirement to preserve and conserve on one hand, but with the requirement to encourage a vibrant, progressive business community and also to support the diverse local residential communities in the Borough. These potentially opposing or conflicting forces, however, can, I believe, be harnessed together for the betterment of the community. Our staff greatly enjoy coming to work and to be part of the daytime community within Spitalfields and the surrounding area. Additionally we have made modest efforts to support children's schooling at Bigland Green Primary School.

We therefore think that the Neighbourhood Plan is significant in setting out the development of the area over coming years, recognizing too, that economic, political, cultural, technological and environmental factors are likely to make the area subject to new pressures as well as the current ones.

Regarding the main points outlined in the Neighbourhood Plan, my comments are as follows;

Quadrupling the Affordable Workspace Rent Discount

We are very aware that the vibrancy of Spitalfields and Shoreditch needs to return post-pandemic and are supportive of the proposals made in this regard. Whilst the direct impact of affordable workspace on our business is minimal, the indirect impact upon the atmosphere of the area is important. We consider the area to be traditionally and currently one for working people, including businesses of all natures, especially those which are innovative, artistic, creative and supportive (retail, restaurant and entertainment) of the community. We place less importance on the area as a tourist attraction, though recognizing that many local businesses rely on the footfall for their trade. We are aware, especially in these restrictive times of pandemic, that bringing businesses back into the area may not be easy and will require encouragement and incentive, rather than increased business rates.

Defining, Enhancing and Protecting our Parks and Gardens

We strongly support the proposals for 'Local Green Spaces' and would look to support a number of 'Urban Greening Projects' if invited to do so. There a number of different projects we have in mind, which we feel we can contribute to, with finance, expertise or resources to continue greening and even wilding of the area.

Greening-Up New Buildings and Old Streets

We support the 'Urban Greening Factor' concept, requiring developers (and existing businesses) to add green roofs, green walls, plant trees or install other 'green infrastructure' in new major developments in our neighbourhood. Our recent construction project in the Truman Brewery meets BREEAM Excellent requirements and we are voluntarily considering ways in which we can go 'above and beyond' in terms of encouraging biodiversity and reducing our carbon footprint in the area. There are some roof areas which, with landlord permission, we could look to 'Green and Wild' over coming years. Though only at an early stage of feasibility, we have started consideration of how we might support urban farming in the centre of London. Our Company is fully committed to Zero Carbon in 2030 and is an active contributor to efforts on local, national and global levels to support Science-Based Targets for Carbon Reduction.

Helping to reduce Anti-Social Behaviour (ASB)

We are aware of the ASB problem in Allan Gardens and have worked in the past with the Borough to help address this when we have considered further investment by our company in the area. This is a matter we would like to pick up again with the Borough.

Protecting our Beautiful Urban Heritage

We fully recognize the importance of 'Local Character Areas' and that the Plan should respect the layout of streets and alleyways. We also recognise, however, how difficult this can be in terms of the evolution of the area. In our case, we have considered parts of the Truman Brewery to be derelict and built on one part in order to, in our view, build a building in keeping with the area. The decision of what is proposed and what is permitted to be built is in the hands of both architects and planners. We can, however, propose that our 'direction of travel' is to fully respect the environment we are in and propose development, which will be sympathetic and acceptable to the other custodians of the area.

Defending Local Culture and Community

The Plan provides protection to around forty buildings, pieces of street furniture and other items of the built environment and we support such protection. Again, we refer to the 'yin and yang' of the area; on one hand for it to be a cradle of innovation, technology and dynamism; on the other to retain and preserve its heritage and spirit.

I hope my comments are of assistance to completing the Neighbourhood Plan and am very open to further discussion on the above matters and any other aspects of the Plan.

<p>Richard J Ince</p>	<p>Dear Planning,</p> <p>POLICY SPITAL7: AFFORDABLE WORKSPACE</p> <p>I am writing to support the Affordable workspace policy being proposed in the Spitalfields Neighbourhood Plan.</p> <p>Affordable workspace is vital to nurture and retain the character and diversity of the area of Spitalfields. It has a long tradition of small businesses, enterprise and craft. We would know! As we have been based in the area of Tower Hamlets for over 215 years - most of which in the Spitalfields area.</p> <p>We ourselves had to leave Bishopsgate in 1985 due to the 'City Creep'. Our building was taken over by developers wanting to redevelop Spitalfields Market. And since then we have seen a haemorrhaging of small independent business leaving the area. As a business we rely on other businesses to help provide the components, packaging and expertise that we need. If these businesses and skills are lost it makes it harder for the rest of us to thrive and carry on in the area.</p> <p>It is vital that affordable workspace is enabled to ensure the business lifeblood of the area can continue and thrive. A 10% discount on the current sky high rents is not affordable. We need at least a 45% discount.</p>
<p>Dr Rubina G Aga</p>	<p>Dear Sir/Madam,</p> <p>I strongly support the Spitalfields Neighbourhood Plan and in particular the Policy Spital7: Affordable Workspace : As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision should be let at an affordable rate at least 45% below the Neighbourhood Area's indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</p>
<p>Dr Giuseppe Pollifrone</p>	<p>Dear Sir/Madam,</p> <p>I strongly support the Spitalfields Neighbourhood Plan and in particular the Policy Spital 7: Affordable Workspace : As required by Tower Hamlets Local Plan Policy D.EMP219 (New employment space), major development of commercial and mixed-use schemes must provide at least 10% of new employment floorspace as affordable workspace for a minimum of 10 years. In Spitalfields, this provision</p>

	<p>should be let at an affordable rate at least 45% below the Neighbourhood Area’s indicative market rate for a minimum of 12 years, subject to viability (which must clearly be demonstrated by an open book viability appraisal).</p>
<p>Dee O’Connell</p>	<p>Dear Sir/Madam</p> <p>I am writing in support of the Spitalfields Neighbourhood Plan to ensure the rent discount on ‘affordable workspaces’ in new major developments should quadruple to 45% off. This big rent reduction will help keep the diversity of independent businesses and employment for which Spitalfields is well known.</p> <p>We had a shop in Spitalfields but we were priced out by our rent being doubled overnight after 5 years there, we were offered a new unit by the same landlord (Spitalfields E1) but a few months later served notice due to redevelopment. We were not able to find a new affordable space there. We are now also in danger of being priced out of Hackney due to covid.</p>
<p>Zeloof LLP and Truman Estates Ltd</p>	<p>Hi Steven</p> <p>I hope you are well.</p> <p>I am emailing to provide a consultation response on the Draft Submission (Regulation 16) version of the Spitalfields Neighbourhood Plan. I am emailing on behalf of Zeloof LLP and Truman Estates Limited, which own different parts of the Truman Brewery site on Brick Lane, as well as a number of other properties within the Spitalfields Neighbourhood Plan area.</p> <p>1. SPITAL7 – Affordable Workspace</p> <p>The main response is around draft policy SPITAL7 (Affordable Workspace) which, in summary, requires major commercial and mixed-use schemes to provide at least 10% of new employment floorspace (use class B1) as affordable workspace at a rent 45% below indicative market rent, for a minimum period of 12 years.</p> <p>As you will know, this exceeds Tower Hamlets’ Local Plan Policy D.EMP2 on affordable workspace which requires major commercial and mixed-use schemes to provide at least 10% of new employment floorspace (use class B1) as affordable workspace at a rent 10% below indicative market rent, for a minimum period of 10 years</p>

I attach a report dated 18 February 2021 from DS2 who specialise in development viability. Please could this be added to and form part of my consultation response. The DS2 report is a detailed review of draft policy SPITAL7.

You will see that DS2 demonstrate and conclude that draft policy SPITAL7 is unviable in the Spitalfields Neighbourhood Plan area. You will also see that DS2 demonstrate and conclude that the Tower Hamlets policy D.EMP2 on affordable workspace is also unviable within the Spitalfields Neighbourhood Plan area.

The reasons for this are set out in full detail in the DS2 report, so I will not repeat those reasons in detail here, but rather will let DS2's report speak for itself as they are the experts in the field.

I will, though, touch briefly on one of the reasons in this email as it relates to feedback provided previously by Tower Hamlets itself.

You will see that the DS2 report notes that the example development sites used by Peter Brett Associates and BNP Paribas in Tower Hamlets' evidence base to support the borough-wide Policy D.EMP2, are (i) large in footprint size, (ii) in locations able to achieve very tall buildings, and (iii) in areas which achieve higher office rents. Conversely the Spitalfields Neighbourhood Plan area (i) is broadly made up of small plots and a small grain with fragmented ownership, (ii) has significant limits on achievable building heights and (iii) achieves lower office rent.

I would note comments that you personally (and your Growth Economic Development team) made to the Forum on 8 July 2020 in your own review of the draft Neighbourhood Plan and the affordable workspace policy in particular. Your 8 July 2020 marked up version of the draft Neighbourhood Plan is attached (please note that the relevant affordable workspace policy was at that date numbered 'SPITAL6'). You state (my underlined emphasis):

"Comment from the Growth and Economic Development team – usual discount is at least 10%, but they would in theory support a larger discount like this where it can be justified."

"Recognition of viability is a good thing – an inspector might be interested in understanding if any testing of viability has been done as part of developing the policy – increasingly, there is a focus on testing viability at the plan stage, to reduce the amount of viability testing needed at the stage of individual applications. You've referenced the Local Plan viability test below, which is good – but all of the sites tested for affordable workspace in that report were large, dense site allocations that will likely contain tall buildings (i.e. Bishopsgate Goods Yard) – there may be a question about whether those assessments are still applicable to the kinds of development that might come forward in the neighbourhood plan area."

I am a member of the Spitalfields Neighbourhood Plan committee. I made this point a number of times to the committee (regarding viability and the example development sites used by Peter Brett Associates and BNP Paribas not being applicable to the Spitalfields Neighbourhood Plan area) both independently and with reference to your comments of 8 July 2020. For this reason I suggested to the committee that the proposed affordable workspace policy might not be viable within the Spitalfields Neighbourhood Plan area. Notwithstanding my comments and yours, no viability analysis of more appropriate and indicative development sites within the Spitalfields Neighbourhood Plan area was carried out by the Forum.

I also presented a 14 September 2020 version of the attached DS2 report to the Spitalfields Neighbourhood Plan committee as part of representations made on the draft pre-submission (Regulation 14) version of the Spitalfields Neighbourhood Plan. The September 2020 version of the DS2 report was materially the same as the one attached dated 18 February 2021. The attached 18 February 2021 report has been updated to account for the passing of 5 months since their previous report, and to make some further clarification of detail.

The wider Forum committee, which I have a good working relationship with, did not agree with my Regulation 14 representations and decided to leave draft policy SPITAL7 as currently drafted. It was understood and agreed by the Forum committee that I would repeat these representations on draft policy SPITAL7 as part of the current (Regulation 16) consultation and also at the Examination in Public. The committee were happy for me to do this.

I will James Frankcom (the Forum chair) know that I have made these same representations to you. I imagine he will be expecting me to make these representations as (as noted above) I made clear to the committee that I would do so when the Regulation 14 representations were discussed.

I would like to conclude on a more positive note by saying that the Truman Brewery does support affordable workspace and the importance of affordable workspace. Indeed, affordable workspace has been an integral part of the Truman Brewery's 25 year-plus track record of supporting small and medium independent businesses across all uses. This approach, which continues today, has helped the Truman Brewery site to become a successful creative and commercial hub and employment generator, which has in turn helped to regenerate the wider Spitalfields area. The Truman Brewery is currently home to a large community of creative businesses of all sizes.

It is, however, vital for planning policy to be viable. In light of the DS2 viability report, I would suggest that draft policy SPITAL7 be amended (the proposed change is shown in bold and underlined) to require major commercial and mixed-use schemes to provide at least 10% of new employment floorspace (use class B1) as affordable workspace at a rent **25%** below indicative market rent, for a minimum period of 12 years. While the DS2 report concludes that this would also not be viable in most developments within the Spitalfields Neighbourhood Forum area, it is a level which the Truman Brewery could support.

	<p>A 25% discount would still be a discount 2.5 times (and therefore 250%) greater than the discount in Tower hamlets' borough-wide D.EMP2, and would be a proud achievement for the Spitalfields Neighbourhood Planning Forum.</p> <p>2. Appendix A - Typo</p> <p>Appendix A, Paragraph A5 refers to non-designated heritage features “...<i>identified and recorded in Appendix D</i>”.</p> <p>I am pretty sure this is a typo, as the non-designated heritage assets are contained in Appendix B (not Appendix D). I think the typo has happened as the order of the Appendices were moved around at some point between different drafts.</p> <p>So this wording in Appendix A, Paragraph A5 should I think read “...<i>identified and recorded in Appendix B</i>”.</p> <p>3. Appendix D – assets of historical interest</p> <p>As it is clear that the items of historical interest (Appendix D) are not subject to any policies in the draft Plan, but rather are “<i>noted by conservationists</i>” as being of interest (paragraph 4.24), we would query whether it is appropriate for them to be included in the Plan. It would seem more appropriate that the list be included in a different, non-planning policy, document which local conservationists are of course always welcome and able to do.</p> <p>I hope the above representations and the attachments are clear, but if you have any questions at all please do let me know (you can email, or call me on 07966 145917).</p> <p>Thank you very much for your time, and I look forward to hearing from you.</p> <p>(attachments provided separately on the Tower Hamlets website at https://www.towerhamlets.gov.uk/lgnl/planning_and_building_control/planning_policy_guidance/neighbourhood_planning/Spitalfields.aspx)</p>
National Grid	<p>Dear Sir / Madam</p> <p>Spitalfields Neighbourhood Plan Regulation 16 Consultation January – February 2021 Representations on behalf of National Grid</p>

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team

Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Responded at	Name	Please type your comments on the Spitalfields Neighbourhood Plan in the box below
2021-01-08 11:45:11 +0000	Tony Hoolaghan	I welcome the plan and its proposals
2021-01-11 11:49:32 +0000	jane guyett	I am very supportive of the Spitalfields Neighbourhood Plan. Living in this important historic area has demonstrated to me that we need a comprehensive and coherent plan. The plan needs to balance local business and the lives of local people. We need more green space, better planned development and stricter enforcement of the development rules. This plan is holistic and strategic. The current planning arrangements are patchy and don't reflect the historic area - the reason people visit Spitalfields in the first place. We are in danger of destroying the uniqueness of the area and the reason for its popularity with visitors.
2021-01-11 18:35:30 +0000	Alex Gordon Shute	The consultation has been thorough. The plan acknowledges a wide diversity of views for an area which is incredibly varied and has many competing interests. The Neighbourhood Plan does a great job. Well done!
2021-01-18 15:37:23 +0000	Christopher Cooper	I am broadly supportive of the Spitalfields Neighbourhood Plan

<p>2021-01-18 17:39:28 +0000</p>	<p>Philip Nichols</p>	<p>We are very supportive of the plan. Of particular interest to us are the recommendations in relation to the Farm and the green spaces in general, in particular Allen Gardens. We support the proposals to define both the Farm and Allen Gardens (SPITAL 5) as “local green spaces” and the associated “urban greening projects” for spending locally through The Community Infrastructure. This includes digging ponds for aquatic wildlife in Allen Gardens in the ‘wild area’.</p> <p>We also support any plans to integrate the Farm and Allen Gardens.</p> <p>We support SPITAL 6, to keep the Ram & Magpie site as “open space associated with the activities of Spitalfields City Farm” and that any planning proposal made by/in conjunction with the farm for this area should be supported.</p>
<p>2021-01-18 19:10:41 +0000</p>	<p>Richard Tyler</p>	<p>I support it.</p>
<p>2021-01-18 19:38:23 +0000</p>	<p>Katrina Bradley</p>	<p>I am in total support of it, I have lived in the area for over 35 years and seen many changes some for the good others for worst.</p>
<p>2021-01-18 21:11:49 +0000</p>	<p>Anne Hartnett</p>	<p>Agree with the full plan</p>
<p>2021-01-21 22:09:20 +0000</p>	<p>David Spurring</p>	<p>This area of London has been most appallingly neglected by LBTH !! It is my hope and that of all the neighbours I know that this plan can reverse the corrosive effect of Anti social behaviour , I hope that there will be a renewal of concern for the long term residents over the present concern for visitors .</p>
<p>2021-01-22 11:56:25 +0000</p>	<p>Alan Williams</p>	<p>I am fully in favour of the Spitalfields Neighbourhood Plan; and wish it every success.</p>

2021-01-26 21:33:43 +0000	NICHOLAS MORSE	A great idea
2021-02-02 11:52:05 +0000	Charlie de Wet	This is a well thought out plan that addresses some of the key issue of the area. I would have like to have seen a commitment to introduce more affordable homes and far more emphasis, not only to respect existing historic features of our diverse community, but to endeavour to replace what has been eradicated - in reviving street names, revealing the national importance of the area etc. etc.
2021-02-17 11:33:54 +0000	CHRIS DUNNE	<p>I have either lived or worked in Tower Hamlets for nearly 40 years. During that time I have seen the gradual and seemingly unplanned encroachment of the City into the beautiful and historic Spitalfields area.</p> <p>This plan seems to me to be not only incredibly timely but also immensely sound in the proposals it makes for neighbourhood planning.</p> <p>It is vital that Tower Hamlets Council allows this plan to be placed before the residents of the borough in a democratic referendum.</p>
2021-02-18 09:20:28 +0000	Alex Bennett-Lewis	Make Spitalfields affordable for small, independent and local businesses. Rent should be at least 45% below market rate

<p>2021-02-18 10:56:01 +0000</p>	<p>M L Hunt</p>	<p>I have lived on the borders of Spitalfields for over 20 years . I love it's history, it's buildings, the old market and the wonderful diversity of businesses and shops. All of this is gradually been lost in a horrendous expansion of the city and it's skyscraper buildings for offices or flats. This building work blocks out the sun, reduces the amount of light in the area, makes the area windy and uninviting, increases the amount of property that is private and cannot be accessed, reduces the amount of greenery and increase the amount of horrible cheap ugly office blocks. There is no balance between old and new, no conservation, no interest in small businesses or local housing or local people and their well-being and mental health.</p> <p>I fully support the Spitalfields Neighbourhood Plan and would like it implemented as soon as possible.</p>
<p>2021-02-18 11:23:11 +0000</p>	<p>HELEN FISHER</p>	<p>ensuring affordable workplace rent in the spitalfields area will allow it to continue to be a diverse and exciting place to visit as a resident or tourist.</p> <p>protecting the heritage buildings will retain the character of the area, and avoid it being swallowed up by the surrounding city skyscrapers, which are already encroaching and overwhelming the area.</p>
<p>2021-02-18 16:40:31 +0000</p>	<p>Annie Watts</p>	<p>I want to support the spitalfields neighbourhood plan</p>
<p>2021-02-18 23:43:37 +0000</p>	<p>Charles Lecklider</p>	<p>I support the plan, although I would like clearer language around redevelopment to ensure there is no more facadism and new buildings do not exceed the height of what they're replacing or their surrounding.</p>