

# Tower Hamlets Local Plan: Main Modifications

The main modifications below are shown in *italics* (deletions are in bold strikethrough text and additions are underlined in bold) or described in words. The page numbers and paragraph numbering below refer to the submitted Tower Hamlets Local Plan.

Ref	Policy / figure / paragraph / site allocation	Proposed modification	Reason for change
MM1	Policy D.SG3: Health impact assessments  Part 1	<p><i>1. The following developments are required to complete and submit a rapid health impact assessment as part of the planning application.</i></p> <p><del><b>a. Major developments.</b></del>  <b>a. b. New Major</b> development within an area of sub-standard air quality (as <b>designated and</b> shown on the Policies Map).  <b>b. e.</b> Developments which contain any of the following uses:</p> <ul style="list-style-type: none"> <li><i>i. Education facilities.</i></li> <li><i>ii. Health facilities.</i></li> <li><i>iii. Leisure or community facilities.</i></li> <li><i>iv. A5 uses (hot-food-takeaways).</i></li> <li><i>v. Betting shops.</i></li> <li><i>vi. Publicly accessible open space.</i></li> </ul>	To ensure health impact assessments are utilised where they are considered to have the greatest impact.
MM2	Policy D.SG5: Developer contributions  Part 2	<p>Insert a new criterion after part 1:</p> <p><b><u>2. For site allocations the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable.</u></b></p>	For clarification in relation to how policies will be applied to site allocations delivering significant infrastructure.
MM3	Policy D.SG5: Developer contributions  After paragraph 2.45	<p>Insert new paragraph and renumber the paragraphs accordingly:</p> <p><b><u>2.46 Part 2 seeks to provide flexibility in the determination of planning applications relating to the site allocations (as outlined in section 4) to ensure that development is viable and can be delivered during the plan period, having regard to the provision of infrastructure and other site specific requirements set out in the plan.</u></b></p>	For clarification in relation to how policies will be applied to site allocations delivering significant infrastructure.

MM4	Policy S.DH1: Delivering high quality design	<p><i>1. Development is required to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales, including the character and distinctiveness of the borough's 24 places (as shown on figure 4) and their features. To achieve this, development must:</i></p> <p><i>a. be of an appropriate scale, height, mass, bulk and form in its site and context;</i></p> <p><i>b. <b>represent good urban design:</b> provide coherent building lines, <b>roof lines</b> and setbacks; <b>roof lines and roof forms, complement</b> street scape rhythm <b>and associated landscapes (including boundary treatment);</b> and <del>other streetscape elements as well as</del> <b>ensure</b> optimal plot coverages to avoid over-development;</i></p> <p><i>c. ensure the architectural language: <b>scale, composition and articulation of a building form</b>, design of detailing, elements and materials applied on elevations; <del>roof forms and landscapes (including boundary treatment)</del> <b>reflects complements and enhances</b> their immediate and wider surroundings;</i></p> <p><i>d. protect important views of and from landmark buildings and vistas;</i></p> <p><i>e. use high quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development;</i></p> <p><i>f. create well-connected, inclusive and integrated spaces and buildings which can be easily adaptable to different uses and the changing needs of users;</i></p> <p><i>g. incorporate features of positive biodiversity value within the site, where possible;</i></p> <p><i>h. <del>take into account the effects on the microclimate and reduce and mitigate the impact of noise, overheating and air pollution that ensure that the</del> <b>development does not result in unacceptably harmful impacts arising from overheating, wind, air pollution, light pollution and noise pollution and the loss of sunlight and daylight</b>, whilst optimising energy and waste efficiency; and</i></p> <p><i>i. provide a mix and range of publicly accessible open spaces and waterspaces that promote biodiversity, health and well-being.</i></p>	For clarification. Provides a clear distinction between urban design and architectural qualities. The definition of architectural language is now embedded into the text.
	Policy S.DH1: Delivering high quality design  Paragraph 3.6	<p><i>Parts a to c provide detailed guidance to ensure that the design, <b>siting</b> and layout of new development is considered in the wider context and is sensitive to the existing character and identity of the area, taking account of the opportunities to improve health and well-being.</i></p>	For accuracy, consistency and clarification.

	<p>Policy S.DH1: Delivering high quality design</p> <p>After paragraph 3.9</p>	<p>Add new paragraph and renumber subsequent paragraphs accordingly:</p> <p><b><u>3.10 Part g will be considered against the objectives set out in the Tower Hamlets Local Biodiversity Action Plan in line with policy D.ES3.</u></b></p>	<p>To provide greater clarification on how policy S.DH1 will be implemented'</p>
MM5	<p>Policy D.DH2: Attractive streets, spaces and public realm</p> <p>Paragraph 3.18</p>	<p><i>In addition, part 1 seeks to embed the principles of secured by design into the design and layout of new development. <b><u>Developers should refer to the relevant guidance in relation to counter-terrorist and crime prevention security and engage fully in the pre-application process in order to ensure that measures to mitigate risks are incorporated into developments, where appropriate.</u></b></i></p>	<p>For clarification to reflect the government's chief planning officer's letter to local authority chief executives (July 2017).</p>

MM6	Policy D.DH6: Tall buildings	<p>1. Developments with tall buildings are required to:</p> <p>a. be of a height and scale, mass and volume that are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings;</p> <p>b. achieve exceptional architecture quality <b>and have innovative and sustainable building design</b>, using robust and durable materials throughout the building;</p> <p>c. enhance the character and distinctiveness of an area without adversely affecting <b>established designated valued</b> townscapes and landscapes (including building/roof lines) or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings;</p> <p>d. provide a positive contribution to the skyline during both the day and night time;</p> <p>e. not prejudice future development potential of adjacent/neighbouring buildings or plots;</p> <p>f. maintain adequate distance between buildings to ensure a high quality ground floor experience and enhanced residential environment;</p> <p>g. demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes;</p> <p>h. present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level;</p> <p>i. provide high quality private <b>and</b> communal open space, play areas <b>and public realm</b> (where residential uses are proposed) for <b>which occupants local residents of the building can use and where appropriate provide shared facilities at the ground floor level to that</b> encourage social cohesion;</p> <p>j. <del>demonstrate that the development mitigate negative impacts does not adversely impact</del> on the microclimate and amenity of the application site and the surrounding area;</p> <p>k. <del>demonstrate that the development mitigate negative impacts does not adversely impact</del> on biodiversity and open spaces, including watercourses and water bodies and their hydrology; and</p> <p>l. comply with <b>c</b>Civil <b>c</b>Aviation requirements and not interfere to an unacceptable degree with telecommunications, television and radio transmission networks and river radar equipment.</p>	To strengthen the effectiveness of the policy. Further clarification and justification on the borough's approach to tall buildings outside of tall building zones.
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2. Development of tall buildings will be directed towards designated Tall Building Zones (as shown on the Policies Map and figure 8) and must apply the following design principles, **having regard to the Tall Buildings Study and other relevant policies.**

<b>Tall building zone</b>	<b>Principles</b>
Canary Wharf (Isle of Dogs)	<ul style="list-style-type: none"> <li>• Development within this location will be expected to <b><u>positively contribute to safeguard</u></b> the skyline <b><u>of strategic importance</u></b> and <b><u>maintain preserve</u></b> the iconic image and character of Canary Wharf as a world financial and business centre</li> <li>• Individual buildings should be integrated into urban super blocks set in the public realm.</li> <li>• Building heights within the Canary Wharf cluster should <b><u>drop away step down</u></b> from the central location at One Canada Square. <b><u>The silhouette of One Canada Square should be clearly visible in all relevant strategic views and borough designated views, as defined in policy D.DH4.</u></b></li> </ul>

		<p><del><b>3. Development of tall buildings proposed outside of these zones must:</b></del></p> <p><del><b>a. significantly strengthen the legibility of a town centre or mark the location of transport interchange</b></del></p> <p><del><b>or other location of civic or visual significance within the area;</b></del></p> <p><del><b>b. provide sufficient distance from other landmark buildings or clusters to create a landmark in the townscape;</b></del></p> <p><del><b>c. unlock significant infrastructure constraints; and/or</b></del></p> <p><del><b>d. deliver significant additional publicly accessible open space</b></del></p> <p><b><u>3. Outside these zones, tall building proposals (including those on site allocations) will be supported provided they meet the criteria set out in part 1 and can demonstrate how they will:</u></b></p> <p><b><u>a. be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas;</u></b></p> <p><b><u>b. address deficiencies in the provision of strategic infrastructure;</u></b></p> <p><b><u>c. significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area;</u></b></p> <p><b><u>and</u></b></p> <p><b><u>d. not undermine the prominence and/or integrity of existing landmark buildings and tall building zones (taking account of the principles set out in figure 8).</u></b></p>	
	<p>Policy D.DH6: Tall buildings</p> <p>After paragraph 3.73</p>	<p>Create a new paragraph and re-number subsequent paragraphs accordingly:</p> <p><b><u>Proposals involving tall buildings on the edge or within the vicinity of tall building zones will be expected to follow the step down approach from the cluster and demonstrate how they will avoid the merging of clusters and be sensitive to the height of the surrounding context. Building heights in the adjacent tall building zone will not be considered to set a precedent for inappropriate heights on adjoining sites.</u></b></p>	
MM7	Paragraph 4.10	<p><i>If our targets are not being met, we will undertake an <b><u>update review</u></b> of the Local Plan to explore ways of addressing this unmet need, taking into account the outcomes of future revisions to the London Plan and opportunities to increase the supply <b><u>of housing as detailed in section 5 below.</u></b></i></p> <p><b><u>Triggers and timescales for an update are outlined in section 5.</u></b></p>	<p>To provide clarity on when a review will be undertaken in line with the requirements of the new National Planning Policy Framework (2018).</p>

MM8	Policy S.H1:Meeting housing needs	<p><i>2. Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through:</i></p> <p><i>a. setting an overall target for 50% of all new homes to be affordable, to be achieved through:</i></p> <p><i>i) securing affordable homes from a range of council-led initiatives;</i></p> <p><i>ii) requiring the provision of affordable housing contributions on sites providing 2 to <del>9 10</del> new residential units against a sliding-scale target (subject to viability);</i></p> <p><i>iii) requiring the provision of a minimum of 35% affordable housing on sites providing <del>10 11</del> or more new residential units (subject to viability); and</i></p> <p><i>iv) requiring a mix of rented and intermediate affordable tenures to meet the full range of housing needs.</i></p>	<p>To reflect the change in national policy between the Written Ministerial Statement (November 2014) (11 unit threshold) and the new National Planning Policy Framework (2018) (10 unit threshold).</p>
	<p>Policy S.H1:Meeting housing needs</p> <p>Paragraph 4.18</p>	<p><i>Part 2 sets a target of achieving 50% affordable homes through private development as well as council-led initiatives. This target is considered to best reflect local housing need. On developments that yield <del>10 11</del> or more net additional residential units, at least 35% affordable housing is expected. Developments are expected to maximise the provision of affordable housing, having regard to availability of public subsidy, implications of phased development (including provision for re-appraising scheme viability at different stages of development) as well as financial viability which should, in particular, take account of prevailing local and regional viability guidance. Applicants are strongly encouraged to meet or exceed the delivery of 35% affordable housing. Lower levels will only be accepted <del>in exceptional circumstances</del> where robustly justified through viability evidence and where it is demonstrated that there are clear barriers to delivery.</i></p>	<p>To reflect the change in national policy between the Written Ministerial Statement (November 2014) (11 unit threshold) and the new National Planning Policy Framework (2018) (10 unit threshold).</p> <p>To remove unnecessary wording given there is already a requirement for robust justification when the policy requirements will not be met.</p>

<p>Policy S.H1: Meeting housing needs</p> <p>After paragraph 4.19</p>	<p><i>4.19 Affordable housing calculations will be made using habitable rooms.</i></p> <p><b><i>4.20</i></b> <i>Given the extent of local need, it is considered necessary and appropriate to seek financial contributions towards the provision of affordable housing from sites of less than 10 units. Financial contributions will be calculated using our preferred methodology as set out in the Planning Obligations Supplementary Planning Document. Over the plan period, developments on small sites have the potential to contribute over 3,000 new homes and could make a significant contribution towards meeting local affordable housing need (see appendix 7). Financial contributions will be calculated using a sliding-scale target starting at 3.5% across the whole site and increasing to 3.5% for each additional home, reaching 35% for sites of <del>10</del> <b>11</b> units <del>or</del> more. Further detail (including on financial viability assessments) is provided in the developer contributions policy (D.SG5) and in the latest Planning Obligations Supplementary Planning Document.</i></p> <p>Renumber subsequent paragraphs accordingly</p>	<p>To reflect the change in national policy between the Written Ministerial Statement (November 2014) (11 unit threshold) and the new National Planning Policy Framework (2018) (10 unit threshold).</p>
<p>Policy S.H1: Meeting housing needs</p> <p>Paragraphs 4.17/4.18</p>	<p>Delete part 5 of the policy:</p> <p><del><b><i>5. Residential development should encourage increased housing sales to Londoners, preferably for owner-occupation.</i></b></del></p> <p>Delete paragraph 4.26 and replace with the following paragraph (to be inserted between paragraphs 4.17 and 4.18):</p> <p><b><i><u>Part 2 requires development to respond to local and strategic market housing need. There is a concern at a regional level that a portion of new build homes in London are not being used in a way which meets housing need and GLA-commissioned research indicates that Tower Hamlets has the second highest percentage of overseas sales in London</u></i></b> NEW FOOTNOTE. <b><i><u>Developers are encouraged to make a voluntary ‘first dibs’ offer to the Mayor of London or participate in any replacement initiative which encourages the marketing of new homes for sale to Londoners in the first instance and/or provides Londoners with an opportunity to purchase new homes before they are marketed overseas – particularly lower cost homes.</u></i></b></p> <p>NEW FOOTNOTE: <b><i><u>Overseas Investors in London’s New Build Housing Market</u></i></b></p> <p>Amend paragraphs accordingly</p>	<p>To provide up-to-date reference to the new GLA scheme and move policy requirement into the supporting text.</p>

MM9	Policy D.H2: Affordable housing <b>and housing mix</b>	<p>2. Development is required to maximise the delivery of affordable housing on-site.</p> <p><del>d. Where a housing development has been permitted and the permission is either subsequently amended (e.g. by means of a variation) to provide more units, or the existing development is extended to provide more units by the granting of a new permission</del> <b>Development which provides further housing units either through an amendment to a current permission or an application to extend an existing development on the same or an adjoining site <u>which is physically or functionally linked; (where the extension is reliant on the existing permission or development to function or to meet policy requirements or standards required elsewhere in the plan), the new units will be considered as part of the existing development and</u> the affordable housing calculation for the new units will <del>reflect the whole development</del> <b>be based on the combined number of units.</b></b></p>	For clarity - providing more detail on its application to ensure it reflects the threshold approach to affordable housing.
	Policy D.H2: Affordable housing <b>and housing mix</b>	<p>5. Estate regeneration development schemes are required to:</p> <p>a. protect and enhance existing open space and community facilities;</p> <p>b. protect the existing quantum of affordable and family units, with affordable units re-provided with the same or equivalent rent levels;</p> <p>c. provide an uplift in the number of affordable homes; and</p> <p>d. <del>bring existing homes up to the latest decent homes standard</del> <b>include plans for refurbishment of any existing homes to the latest decent homes standard.</b></p>	Clarification to reflect operation of decent homes work.

<p>Policy D.H2: Affordable housing <b>and housing mix</b></p> <p>Paragraph 4.36</p>	<p><i>Part 2 (d) refers to incremental development. This is housing development where permission is subsequently amended (e.g. by means of a variation of the extant planning permission) to the extent that the amended development would provide new units or the existing development is extended <b>to provide new units</b> by the granting of a new permission on <b>the same or</b> an adjoining site where the units would <del>be</del> physically or functionally <b>linked extend the existing development</b> (e.g. <del>sharing by</del> <b>relying on</b> a common access core <b>or on the existing</b> amenity space or other communal facilities <b>in order to meet the policy requirements or standards required elsewhere in the plan) and the linked development would provide new units.</b> In these circumstances, we consider the new units to be part of the existing development and the affordable housing requirements will be calculated accordingly, <b>taking into account the affordable housing already delivered or secured.</b> In both cases, where the amended or linked development would provide <del>11</del> <b>10</b> units or more in aggregate, affordable housing should be provided, <del>as per</del> <b>in accordance with policy S.H1 (part 2 aiii) and parts 1 and 2 (a to c)</b> above. If it would result in less than <del>11</del> <b>10</b> new units in aggregate, policy S.H1 (<del>part 2 aii</del>) will apply. <b>If lower than policy compliant levels of affordable housing for the total scheme (as amended or extended) are proposed, this will only be accepted where robustly justified through <del>The recalculation will be undertaken via</del> a financial viability assessment, in line with <del>the our</del> latest guidance (as outlined in paragraph 4.18). The financial viability information should be proportionate to the scale of change and time elapsed between the existing approval or development and the proposed amendment or extension.</b></i></p>	<p>For clarity - providing more detail on its application to ensure it reflects the threshold approach to affordable housing.</p> <p>Supporting text to support policy change proposed above.</p>
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	<p>Policy D.H2: Affordable housing <b>and housing mix</b></p> <p>Paragraph 4.37</p>	<p>Part 3 requires proposals to provide a range of unit sizes. Unit size distribution will be calculated by unit numbers and not habitable rooms. Developments may be required to meet updated needs as a result of monitoring. <b><u>Where a development proposes to deliver at least 35% affordable housing (to use the fast track approach) and in exceptional circumstances (for example, where applications propose to deliver a significantly higher quantum of affordable housing than 35%, whilst meeting the required affordable housing tenure mix, and/or propose to deliver significant social infrastructure on-site), we will consider a different housing mix, having regard to the following factors:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>The proposal must meet the tenure split requirements outlined in part 1.</u></b></li> <li>• <b><u>Proposals will be expected to meet our affordable housing product requirements outlined in paragraphs 4.29 and 4.30.</u></b></li> <li>• <b><u>Greater unit mix flexibility can be applied to the market tenure unit mix, as opposed to the unit mix for affordable housing. However, the scheme must still provide a significant proportion of family housing in the market tenure and proposals will be expected to meet our unit mix requirements to deliver family housing in the affordable tenures.</u></b></li> </ul> <p><b><u>The use of the fast track threshold approach where the unit mix and affordable housing product split is not being met must be confirmed as acceptable by our affordable housing team.</u></b></p>	<p>Provide flexibility to allow for developers to use the threshold approach.</p>
MM10	<p>Policy D.H6: Student housing</p> <p>Part 1</p>	<p>1. Proposals involving new purpose-built student accommodation should be directed to locations which are within close proximity to the borough's higher education institutions or in highly accessible locations and must:</p> <p>a. not compromise the supply of land for self-contained homes;</p> <p>b. have an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide an element of affordable student accommodation;</p> <p>c. respect existing residential amenity; and</p> <p>d. provide <del>10% of student rooms which are easily adaptable for occupation by wheelchair users.</del> <b><u>5% of student rooms which are wheelchair accessible, including access to a wheelchair-accessible shower room for independent use.</u></b></p>	<p>Necessary for soundness to require a level of provision which reflects need and building regulations.</p>
	<p>Policy D.H6: Student housing</p> <p>Between paragraphs 4.62 and 4.63</p>	<p>Insert a new paragraph and renumber subsequent paragraphs accordingly:</p> <p><b><u>In order to meet the needs of students with physical disabilities, 5% of student rooms must be wheelchair accessible (capable of being independently accessed and used). To meet this requirement, rooms and bathrooms must meet the requirements outlined in figure 30 and figure 52 in the British Standard BS8300: Design of an accessible and inclusive built environment.</u></b></p>	

MM11	<p>Policy D.H7: Housing with shared facilities (houses in multiple occupation)</p> <p>Part 1</p>	<p>1. <i>New houses in multiple occupation will be supported where they:</i></p> <p><b><u>a. meet an identified need;</u></b>  <b><u>b. do not result in the loss of existing larger housing suitable for family occupation;</u></b>  <b><u>c. b. can be secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing;</u></b>  <b><u>d. e. are located in an area of high transport accessibility;</u></b>  <b><u>e. d. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood; and</u></b>  <b><u>f. e. comply with relevant standards and satisfies the housing space standards outlined in policies D.H3 and D.DH8.</u></b></p>	<p>For clarification and to provide better alignment with policy S.H1</p>
	<p>Policy D.H7: Housing with shared facilities (houses in multiple occupation)</p> <p>Paragraph 4.68</p>	<p><i>The Greater London Authority (GLA) household projections suggest there is an increasing demand for HMO-style accommodation in the borough, particularly among young people. The number of ‘other type’ households (which includes HMOs) headed by persons aged 16-34 is projected to rise from 12,295 in 2016 to 16,555 in 2031 NEW FOOTNOTE. High quality, large-scale HMOs can help meet this need. <b><u>This will need to be demonstrated with regards to the specific scheme and location (part a). Applications should seek to address housing need, as outlined in policies S.H1 (see paragraph 4.21) and D.H2. It is considered this is best delivered through a mixed tenure scheme which could meet a range of housing needs. In addition However,</u></b> reflecting the changing role of HMO-style accommodation in the borough and the acute shortage of affordable housing, it is appropriate that all forms of market housing (including HMOs) contribute towards meeting the high affordable housing need.</i></p> <p>NEW FOOTNOTE: <b><u>Tower Hamlets Strategic Housing Market Assessment (2017)</u></b></p>	<p>For clarification and to provide better alignment with policy S.H1.</p> <p>Supporting text to support policy change proposed above.</p>
MM12	<p>Policy D.TC2: Protecting retail in our town centres</p>	<p>3. <i>Within the Secondary Frontages, development <del>should will be expected to:</del></i></p> <p><b><u>a. contribute to achieving a minimum of 40% ensure the proportion of ground floor units within as A1 (retail) use does not fall below 40% of the total number of units within the Secondary Frontage; and</u></b>  <b><u>b) support a broad range of non-retail commercial and community uses which support the overall function of the town centre.</u></b></p>	<p>Necessary to provide more flexibility to respond to future market conditions and reflect the changing role of town centre.</p>

	<p>Policy D.TC3: Retail outside our town centres</p> <p>Part 1</p>	<p>1. Outside of the borough's <b>Major, District and Neighbourhood Centres <del>town centre hierarchy</del></b>, new retail development will be subject to:</p> <p>a. a sequential test; and individual units do not exceed 200 square metres; and</p> <p>b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace</p>	<p>This modification to policy D.TC3 provides further clarity over the application of the sequential test and impact assessment in accordance with the National Planning Policy Framework and the London Plan's definition of town centres.</p>
	<p>Policy D.TC3: Retail outside our town centres</p> <p>Paragraph 6.31</p>	<p>New retail units or extensions outside of the <del>town</del> centres <b>set out in part 1 hierarchy</b> should not exceed 200 square metres gross floorspace to ensure that <b>they are local in nature and do not harm the vitality and viability of existing centres (as defined on the Policies Map)</b>. Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF. <b><u>The primary shopping areas of the Major and District Centres are illustrated on the Policies Map. For Neighbourhood Centres, their boundaries (as illustrated on the Policies Map) will equate to the primary shopping areas of these centres.</u></b></p>	<p>Supporting text amendment for consistency with above modification.</p>
	<p>Policy D.TC3: Retail outside our town centres</p> <p>After paragraph 6.31</p>	<p>Insert new paragraph and amend subsequent paragraph numbers accordingly:</p> <p><b><u>The Central Activities Zone and Tower Hamlets Activity Areas have a unique role in the town centre hierarchy. New retail uses may be appropriate in these areas, especially those of a smaller scale, where they would not detrimentally affect the vitality and viability of Major, District or Neighbourhood Centres. We take a judgement-based approach to proposals within these areas and a sequential test and/or impact assessment may still be required where a proposal has a potentially adverse impact on a Major, District or Neighbourhood Centre.</u></b></p>	<p>Supporting text amendment for consistency. This is necessary as it provides greater clarity over our approach to the Central Activities Zone (CAZ) and the Tower Hamlets Activity Areas as bespoke policy designations within the town centre hierarchy in policy S.TC1.</p>
<p>MM13</p>	<p>Policy S.OWS1: Creating a network of open spaces</p>	<p>1. Proposals will be required to provide or contribute to the delivery of an improved accessible, well-connected and sustainable network of open spaces through:</p> <p>a. protecting all existing open space to ensure that there is not net loss <b>(except where it meets the criteria set out in policy D.OWS3);</b></p> <p><b>b. maintaining the open character of Metropolitan Open Land;</b></p> <p><del>c. b.</del> improving the quality, value and accessibility of existing publicly accessible open space across</p>	<p>To support the illustration of MOL on the Policies Map and provide information how development proposals on MOL designation will be assessed.</p>

		<p><i>the borough and neighbouring boroughs, in line with the Green Grid Strategy, Open Space Strategy, Local Biodiversity Action Plan and Sport England’s Active Design Guidance;</i></p> <p><i><del>d. e.</del> delivering an improved network of green grid links in line with the Green Grid Strategy to enhance access to key destination points (town centres, community facilities and publicly accessible open spaces) and to and along waterspaces, as well as provide ecological corridors for wildlife; and</i></p> <p><i><del>e. d.</del> maximising the opportunities to create/increase publicly accessible open space (including playing pitches and ancillary sporting facilities) with a range of sizes and for a range of users, particularly in the following locations (which are expected to experience the highest level of open space deficiency).</i></p> <ul style="list-style-type: none"> <li>• Bethnal Green</li> <li>• Blackwall &amp; Cubitt Town</li> <li>• Bromley North</li> <li>• Bromley South</li> <li>• Canary Wharf</li> <li>• Limehouse</li> <li>• Poplar</li> <li>• Shadwell</li> <li>• Spitalfields &amp; Banglatown</li> <li>• St Dunstan’s</li> <li>• St Peter’s <del>Weavers</del></li> <li>• <u>Weavers</u></li> <li>• Weavers</li> <li>• Whitechapel</li> </ul> <p><i><del>f. e.</del> assisting with the delivery of enhanced new strategic publicly accessible open spaces at Lea River Park (including the Leaway) and within site allocations.</i></p> <p><b><u>2. Inappropriate development on areas designated as MOL (as shown on the Policies Map) will not be permitted unless very special circumstances can be demonstrated in line with the requirements set out in the National Planning Policy Framework.</u></b></p>	
MM14	Policy D.OWS3: Open space and green grid networks	<p><i>1. Developments on areas of open space (<b><u>excluding Metropolitan Open Land</u></b>) will only be supported in exceptional circumstances where:</i></p> <p><i>a. it provides essential facilities that enhance the function, use and enjoyment of the open space (e.g. ancillary sport facilities to the playing field use); or</i></p>	For accuracy, consistency and clarification.

		<p>b. <i>as part of a wider development proposal, both an increase of open space and a higher quality of open space can be achieved; <b>and</b></i></p> <p>c. <i>in any of the circumstances described in parts <b>21</b> a and <b>21</b> b, it is demonstrated that it will not result in any adverse impacts on the existing ecological, heritage or recreational value of the open space and the flood risk levels within and beyond the boundaries of the site; and</i></p> <p>d. <i>it is an outdoor sport and recreational space or facility, the sporting and recreational benefits of which would outweigh the harm resulting from its loss.</i></p>	
MM15	Policy D.OWS4: Water spaces	<p>1 <i>Development within or adjacent to the borough’s water spaces is required to demonstrate that:</i></p> <p>a. <i>it does not result in loss or covering of the water space, unless it is a water-related or water dependent use at appropriate locations <b>and of appropriate scale;</b></i></p> <p>b. <i>there are no adverse impacts on the existing water spaces network, including navigation, biodiversity, water quality, visual amenity, <del>openness and the</del> character and heritage value of the water space, taking into consideration the adjacent land, and the amenity of existing surrounding development;</i></p> <p><b>c. there are no unacceptable impacts on the openness of the water space;</b></p> <p>d. <i>it enhances the ecological, biodiversity and aesthetic quality of the water space, taking into account the design and landscaping of the adjacent land area, in line with the Tower Hamlets Local Biodiversity Action Plan and the European Union Water Framework Directive;</i></p> <p>e. <i>it does not have an adverse impact on other existing active water uses;</i></p> <p>f. <i>it will provide increased opportunities for continuous public access, use of the water space for water-related uses and sport and recreational activities;</i></p> <p>g. <i>it responds positively and sensitively to the setting of water space, while respecting and animating water space to improve usability and safety; and</i></p> <p>h. <i>it provides suitable setbacks from water space edges to mitigate flood risk and to allow riverside walkways, canal towpaths and cycle paths, where appropriate. Where necessary, development should contribute to the restoration of the river walls and embankments.</i></p>	To provide greater flexibility to development proposals which are water-related or water-dependent.
	Policy D.OWS4: Water spaces  After paragraph 8.51	<p>Add the following paragraph and re-number the subsequent ones accordingly:</p> <p><b><u>The sense of openness greatly contributes to a person’s perception and enjoyment of water spaces. This is of particular importance in a borough like Tower Hamlets where there is a high deficiency of open space. When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm.</u></b></p>	Necessary for consistency in relation to the changes to new part c under policy D.OWS4.

MM16	Policy D.ES3: Urban greening and biodiversity  After paragraph 9.24	Insert new paragraph and renumber the subsequent ones accordingly:  <b><u>Due to the environmental importance of trees, at least a ‘one-for-one’ replacement rate is required for any trees affected by a development (see part 1 above). Where we are convinced these cannot be incorporated on site, we will consider the provision of a replacement tree on a suitable site, as close to the development as possible. We will also expect developments to incorporate additional trees, wherever possible. Their location must be carefully considered to ensure there is no adverse impact on overshadowing, wind effects, air quality, ecology or flood risk. Where trees are proposed along the river corridor, their positioning must be carefully considered to ensure there are no adverse impacts on ecology or flood risk. A buffer of at least 5 metres is suggested between the bank and tree. We will take a ‘right tree for the right site’ approach which takes account of historic context, availability of space, soil conditions, wildlife value, potential improvements to air and soil quality, provision of shade and reducing the effects of and adapting to climate change. This will need to be evidenced in the ecology assessment.</u></b>	Additional text necessary for effectiveness and clarity.
MM17	Policy D.ES7: A zero carbon borough  Part 2 and paragraph 9.53	2. Development is required to maximise energy efficiency based on the following standards:  a. All new non-residential development <del>and non-self-contained residential accommodation</del> over 500 square metres floorspace (gross) must meet or exceed BREEAM ‘excellent’ rating.  b. All major non-residential refurbishment of existing buildings and conversions over 500 square metres floorspace (gross) must meet at least BREEAM non-domestic refurbishment ‘excellent’ rating.  9.53 In addition, developments should implement at least the minimum standards set out in BREEAM (Building Research Establishment Environmental Assessment Method) <b><u>which</u></b> applies to non-residential developments, <b><u>non-self-contained housing and</u></b> residential development arising from conversions and changes of use. This method provides a holistic assessment of the environmental sustainability of a development. The Home Quality Mark is one way of demonstrating the standard of a new residential dwelling, which includes measures for low carbon dioxide, sustainable materials, good air quality and natural daylight. We strongly encourage schemes to use the Home Quality Mark.	To ensure the policy and supporting text is consistent with the WMS on this issue.
MM18	Policy D.ES6: Sustainable water and waste water management  Paragraphs 9.47 -	9.47 In relation to part 3, major development (as defined in the glossary) is required to demonstrate that there is adequate capacity both on and off site to serve the development. <del><b><u>It may be necessary to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure.</u></b></del> <b><u>Developers should contact Thames Water as early as possible (preferably in advance of the submission of a planning application) to discuss their development proposals and intended delivery programme to assist with identifying any potential</u></b>	To ensure the effective implementation of the policy.

	9.48	<p><b><u>water and wastewater network reinforcement requirements in order for Thames Water to undertake the necessary upgrades. Where there is a capacity constraint, <del>and no improvements are programmed by the water company (Thames Water), the proposed development will be required to provide for the appropriate improvements, which must be completed prior to occupation of the development.</del> phasing conditions may be applied to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</u></b></p> <p><b><u><del>9.48 Developments are strongly encouraged to contact Thames Water in advance of the submission of planning applications to ensure that the water and wastewater requirements of development proposals are understood and that any upgrade requirements are identified.</del></u></b></p> <p>Renumber subsequent paragraphs accordingly</p>	
MM19	Part 4: Delivering Sustainable Places, after paragraph 1.7	<p>Insert the following paragraph and amend the subsequent numbering accordingly:</p> <p><b><u>When determining a planning application, flexibility may be applied to the policies relating to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme to ensure the site allocation is deliverable in the context of the principles of sustainable development.</u></b></p>	Necessary to introduce greater flexibility to ensure that the policies relating to the site allocations are deliverable.
MM20	Delivering sustainable places: City Fringe sub-area development principles  Paragraph 2.5	<p>Include the following wording to the sub-area development principles, under 'improving connectivity and travel choice':</p> <p><b><u>23: Provide the necessary and suitable bus facilities within the vicinity of the Whitechapel district centre to ensure that there is sufficient capacity to support existing and future operation of bus services in Whitechapel, including enhancements linked to the Elizabeth line.</u></b></p>	Necessary to ensure transportation issues are adequately reflected in the policy wording.
MM21	Marian Place Gas Works and The Oval site allocation (1.3)	<p>To be inserted into the delivery considerations:</p> <p><b><u>The gasholders do not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme.</u></b></p>	To clarify how the gasholder floorspace will be considered in relation to employment provision.
MM22	Whitechapel South site allocation (1.4)	<p>To be removed from the infrastructure requirements:</p> <p><b><u>District heating facility</u></b></p>	For clarification in relation to its future delivery.
	Whitechapel South site allocation (1.4)	<p>To be inserted into the delivery considerations:</p> <p><b><u>Developers should explore the option of delivering a district heating facility within the vicinity of</u></b></p>	For clarification in relation to its future delivery.

		<b><u>the development.</u></b>	
	Whitechapel South site allocation (1.4)	To be inserted into the delivery considerations:  <b><u><del>Delivery of a health facility should be an NHS funded primary care and re-provide the existing sexual health facility. The existing sexual health facility (including HIV services) will need to be re-provided on site in accordance with the prevailing sexual health facility building guidance (e.g. Health Building Note 12-01: Consulting, examination and treatment facilities. Supplement A: Sexual and reproductive health clinics) unless an alternative location can be found which meets the requirements of policy D.CF2. A continued service will need to be maintained to the satisfaction of the council's public health team.</del></u></b>	Re-provision is necessary to safeguard the council's ability to meet its statutory obligation and procure a high quality sexual health service in the most suitable location.
MM23	Bow Common Gas Lane site allocation (2.1)	To be inserted into the delivery considerations:  <b><u>Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on site decontamination requirements caused by the gasworks.</u></b>	To provide greater clarification in relation to the policy requirements.
	Bow Common Gas Lane site allocation (2.1)	To be inserted into the delivery considerations:  <b><u>Prior to demolition, the gasholders on the site did not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme.</u></b>	Clarify how the gasholder floorspace will be considered in relation to employment provision.
MM24	Chrip Street Town Centre site allocation (2.2)	Amendment to figure 31:  Show Kerbey Street as a strategic pedestrian/cycling route	To provide greater clarification.
MM25	Leven Road Gas Works site allocation (3.2)	To be inserted into the delivery considerations:  <b><u>Prior to demolition, the gasholders on the site did not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme.</u></b>	Clarify how the gasholder floorspace will be considered in relation to employment provision.
MM26	Aspen Way site allocation (4.1)	To be inserted into infrastructure requirements:  <ul style="list-style-type: none"> <li>• Strategic open space (minimum of 1 hectare)</li> <li>• College (re-provision)</li> <li>• Community centre and associated football pitches (re-provision)</li> <li>• <b><u>Re-provision of DLR depot (Transport for London)</u></b></li> <li>• <b><u>Improvement and enhancement of existing pedestrian bridge over Aspen Way and routes to it</u></b></li> </ul>	In order to ensure the infrastructure requirements are accurately reflected in the policy wording.

MM27	Millharbour site allocation (4.8)	To be inserted into the infrastructure requirements: <ul style="list-style-type: none"> <li>• <i>Small open space (minimum of 0.4 hectares)</i></li> <li>• <i>Primary school</i></li> <li>• <i>Health facility</i></li> <li>• <b><u>Re-provision of existing alternative provision secondary school</u></b></li> </ul>	For accuracy and clarification and to facilitate alternative secondary school provision on the college site.
MM28	North Quay site allocation (4.9)	To be inserted into the design principles: <p><i>a. accommodate a new east-to-west <b>pedestrian/cycle</b> route through the site <b>which facilitates connections</b> to <del>into the cycle</del> the <b>wider movement network</b>, and the DLR and underground stations adjoining the site. <del>and pedestrian movement to/from the DLR stations at Poplar and West India Quay and the Elizabeth line station;</del></i></p>	To provide greater clarification on the application of the policy.
	North Quay site allocation (4.9)  Figure 47	Amend boundary to more closely reflect the planning application. This will also be reflected in figure 19, figure 37 and figure 38.	Necessary for the plan to accurately reflect the more recent planning application boundary.
MM29	Westferry Printworks site allocation (4.12)  Figure 50	Amend boundary to omit the leisure centre. This will also be reflected in figure 19, figure 37 and figure 38.  Amend boundary to reflect the application boundary. This will also be reflected in figure 19, figure 37 and figure 38.	For clarification, accuracy and consistency to reflect the existing planning application and ensure the deliverability of the site.
MM30	Wood Wharf site allocation (4.13)  Figure 51	Amend boundary to more closely reflect the planning application, particularly in relation to the southern boundary  This will also be reflected in figure 19, figure 37 and figure 38.	To ensure the deliverability of the site.
MM31	Achieving sustainable growth	Insert new indicator after KMI1: <b><u>KMI 2: Delivery of housing and key infrastructure requirements through site allocations (not including school sites)</u></b>  Insert new target: <b><u>As set out in the site allocations</u></b>	Additional target based on plan policy/site allocations – allows for the monitoring of housing and infrastructure delivery.

Achieving sustainable growth	<p>Insert new indicator after KMI1: <b><u>KMI 3: Delivery of primary and secondary schools through site allocations.</u></b></p> <p>Insert new target: <b><u>Primary and secondary schools associated with site allocations shall be delivered at a rate which keeps pace with the levels of need identified in the most recent Planning for School Places document.</u></b></p>	Additional target based on plan policy/site allocations – allows for the monitoring of school delivery set out in the site allocations.
Creating attractive and distinctive places	<p>Add new indicator after current KMI6: <b><u>KMI 9: Number of tall buildings within and outside of Tall Building Zones (for the purposes of this indicator, only developments referable to the Mayor of London for being over 30 metres in height will be looked at)</u></b></p> <p>Add new target: <b><u>N/A</u></b></p>	Additional target based on plan policy D.DH6, allows for monitoring of effectiveness of tall buildings policy.
Delivering economic growth	<p>Add new indicator after current KMI17: <b><u>KMI 21: Proportion of affordable workspace secured on major schemes (workspace at least 10% below the indicative market rate for the relevant location).</u></b></p> <p>Add new target: <b><u>All new major commercial and mixed-use development schemes to provide at least 10% of new employment floorspace as affordable workspace.</u></b></p>	Additional target based on plan policy D.EMP2. The policy sets a target for affordable workspace, and this modification allows for monitoring its effectiveness.
Revitalising our town centres	<p>Insert new indicator after current KMI21: <b><u>KMI 26: Proportion of A5 uses within Major, District and Neighbourhood Centres, and the number of existing and permitted A5 uses within 200 metres walking distance of an existing or proposed school. Monitoring will be supplemented by an annual public health analysis of childhood obesity in Tower Hamlets.</u></b></p> <p>Insert new target: <b><u>In District and Neighbourhood Centres, not more than 5% of all town centre uses to be A5 uses.</u></b></p> <p><b><u>No new A5 uses permitted within 200 metres walking distance of an existing or proposed school</u></b></p>	Additional target based on plan policy D.TC5. The policy restricts the amount of A5 uses in town centres, and this modification allows for monitoring its effectiveness.
Supporting community facilities	<p>Add new indicator before current KMI22: <b><u>KMI 28: Gain/loss of A4 floorspace</u></b></p> <p>Add new target: <b><u>No further loss of A4 floorspace</u></b></p>	Additional target based on plan policy D.CF4. The policy is concerned with the loss of public houses, and this modification will monitor the loss of such uses thus

			measuring its effectiveness.
	Enhancing open spaces and water spaces	Add new indicator before current KMI24: <b><u>KMI 31: Loss of water space</u></b>  Add new target: <b><u>No further loss of water space</u></b>	Additional target based on plan policy D.OWS4. The policy requires no loss of water space, and this modification will allow for monitoring its effectiveness.
	Enhancing open spaces and water spaces	Add new indicator before current KMI26: <b><u>KMI 32: Biological quality of the Lower Lea river</u></b>  Add new target: <b><u>'Good' status or better</u></b>	Additional target based on plan policy S.ES1. The policy requires the protection and enhancement of biodiversity in the borough, and this modification allows for monitoring of one aspect of that.
	Protecting and managing our environment	Add new indicator after current KMI29: <b><u>KMI 38: Percentage of new developments meeting zero carbon requirement (or 45% reduction target for non-residential up to 2019)</u></b>  Add new target: <b><u>100% of new developments</u></b>	Additional target based on plan policy D.ES7. The policy sets targets for the zero carbon requirement, and this modification allows for the monitoring of its effectiveness.
	Protecting and managing our environment	Add new indicator after current KMI29: <b><u>KMI 39: Percentage of residential development meeting the Home Quality Mark</u></b>  Add new target: <b><u>100% of new residential developments</u></b>	Additional target based on plan policy D.ES7. The policy sets targets for the zero carbon requirement, and this modification allows for the monitoring of its effectiveness.
	Protecting and managing our environment	Add new indicator after current KMI29: <b><u>KMI 40: Percentage of non-residential development meeting BREEAM excellent standard</u></b>  Add new target: <b><u>100% of new non-residential developments</u></b>	Additional target based on plan policy D.ES7. The policy sets targets for the zero carbon requirement, and this modification allows for the monitoring of its effectiveness.
	Improving connectivity and travel choice	Add new indicator before current KMI34: <b><u>KMI 46: Transport modal share among residents</u></b>  Add new target: <b><u>Decrease in private car modal share from baseline level (2016)</u></b>	Additional target based on plan policy S.TR1. The policy requires sustainable travel to be improved within the borough, and this modification allows for the monitoring of travel choice in the borough, measuring the effectiveness of the policy.

	Improving connectivity and travel choice	<p>Insert new indicator after KMI36:  <b><u>KMI 47: Level of crowding on the Jubilee line, Elizabeth line and DLR trains within the borough.</u></b></p> <p>Insert new target:  <b><u>N/A - monitoring will feed into discussions on strategic transport infrastructure with Transport for London and other partners.</u></b></p>	Additional target based on plan policy S.TR1 and D.TR2. These policies require an increase in sustainable travel and for adverse impact on the public transport network to be mitigated – this modification will allow for public transport crowding to be monitored as part of ensuring the effectiveness of these policies.
MM32	Appendix 1: Glossary  Tall buildings	<p>Any building that is significantly taller than <del>their surroundings</del> <b><u>its local context</u></b> and/or <del>have</del> has a significant impact on the skyline.</p> <p><b><u>Within the borough, buildings of more than 30 metres, or those which are more than twice the prevailing height of surrounding buildings (whichever is less) will be considered to be a tall building.</u></b></p>	<p>For consistency, accuracy and clarity.</p> <p>To reflect definition in paragraph 3.64 of the Local Plan.</p>