London Borough of Tower Hamlets

Development Plan Documents Consultation Summary Report

May – July 2011
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Introduction

The Council’s Local Development Framework (LDF) currently includes the 2010 Adopted Core Strategy which sets out the spatial vision for development over the next 15 years and which will help shape the future of the borough. By building on the Core Strategy’s policies and objectives, the three emerging Development Plan Documents will provide the necessary detail to support delivery of affordable and family housing, jobs, new parks, schools and other important services. They will also provide guidance on how the places within the borough will be shaped to accommodate this change while retaining and enhancing local identity.

Descriptions of all three DPDs are provided below:
- Development Management DPD – this will set out policies to ensure individual development proposals will help to deliver the Core Strategy vision as well as respond appropriately to their local surroundings.
- Sites and Placemaking DPD – this will allocate sites needed for new infrastructure (including schools, health facilities, leisure centres, and Idea Stores) and larger scale housing developments.
- Fish Island Area Action Plan – this will shape the regeneration of Fish Island, providing new homes and jobs and connecting Tower Hamlets with the wider Olympic Park legacy.

Please note that the Development Management DPD and Sites and Placemaking DPD have subsequently been merged to form the Managing Development DPD.

Consultation
Pre-consultation was undertaken in late 2010 to establish how the public wanted to be consulted. Feedback highlighted the desire to be consulted on a more local basis. In response to this the Council undertook consultation on a ‘place by place’ basis, taking locally relevant policies to the places where they would be implemented.

A total of 26 events were held during the consultation period, including 20 ‘place’ events. They were attended by a mix of residents, consultants, developers and businesses.

Consultees were asked to give their views and to respond to a series of questions relating to each section of the document.

Commentary Summary
The following provides a summary of some of the key issues which were raised during the consultation, both during ‘place’ events and formally in writing to the Council.
Sites and Placemaking DPD

1. Bishopsgate Goodsyard
   - Suggested uses for the site included new schools and open space.
   - It was requested that non-residential development be added to this site.

2. Hollybush Gardens
   - A request for inclusion of the Travis Perkins site, on Hollybush Place, was made.

3. Marian Place gas works and The Oval
   - A mix of housing tenure was highlighted as important, as well as community infrastructure to support new housing.
   - Possible site uses included open space, new schools and community amenity space. District heating facilities for the new development were supported.
   - Inclusion of a policy identifying the suitable re-provision/re-location of Royal Mail’s operations prior to redevelopment was requested.

4. Goodman’s Fields
   - Changes to the boundary were suggested, taking into account the completed City Quarter development and 75 Leman Street retention.
   - Greater clarity on the management of tall buildings was requested.

5. Royal London Hospital
   - Inclusion of the site was supported, particularly that it could be developed for health uses, a district heating facility and other compatible uses.
   - Other suggested uses included commercial, residential, retail, education, hotel and housing. It was suggested that the site boundary should be changed to exclude a number of residential properties.

6. John Orwell Sports Centre & Vaughan Way
   - Further information identifying the significance of heritage assets on the site was suggested.

7. News International
   - Concerns were raised regarding water and waste water at this site due to network capacity being unlikely to be able to support the anticipated demand from development. Investigations into the impacts were recommended.

8. St. George’s Pool
   - Comments included requests for improvements to the public realm around the site and improved access.

9. Fish Island AAP
   - Comments received suggested that this area needs further detail as the Fish Island AAP does not include site specific proposals to the same level of detail as the Sites and Placemaking document.
   - Requests for Bow Midland West Rail Yard to be safeguarded

10. Mile End Hospital
    - Support was shown for Mile End Hospital to continue as a medical facility

11. Southern Grove Lodge
    - Inclusion of the site was supported.
• Support was shown for the protection of the open space in the site which could be made public and opened up to connect with the amenity spaces within Eric & Treby Estate and form a green link from Cemetery Park/Southern Grove to Mile End Park.
• Support given for Southern Grove including a primary/special needs school

12. Toby Lane Depot and 11-13 Solebay Street
• A number of comments showed that a school on this site was generally not supported.
• Suggestions of possible site uses included new strategic open space.

13. Bow Locks
• Concerns were raised about the site being used for a school due to limited pedestrian access and poor air quality. Justification of such a use on this site was requested.
• Suggestions of a mixed use scheme on the site
• Identification of pedestrian and cycle routes across Twelvetrees Crescent requested.

14. Bromley-by-Bow Redevelopment
• Regard for the potential significant impact on the adjoining park area and the Three Mills Conservation Area was suggested as being an important consideration. A request for the conservation area to be shown on the map was made.
• Comments received supported the principle of redevelopment for a mix of uses.

15. Bow Common gas works
• There was general support for a district heating facility at this site, as well as large-scale housing, though comments that this could subsequently require a new primary school were made.
• Support was shown for the site as a suitable for housing and open space.

16. Chrisp Street town centre
• The principle of redevelopment of the town centre was supported.
• There was a formal request by the Post Office for an appropriate, flexible policy identifying the suitable reprovision/relocation of their facilities prior to the redevelopment of their site.

17. Cording Street
• Suggested uses included a new school or strategic open space

18. Poplar Baths
• Detail was requested on how Poplar Baths can be sensitively reused

19. Ailsa Street
• Support was shown for the housing and community aspirations. Some concern was shown for the site being used for educational or waste to energy uses.
• Consideration in maximising the waterside potential was asked to be added.
• Comments concerning the importance of improving of the Public Transport Accessibility Level (PTAL) of the site were made.
20. Leven Road gas works
- It was suggested that open space would be most compatible with the residential to the south, greatly enhancing the character of the area and improving the environment for residents.
- Some concerns relating to the site being used as a heating facility. It was suggested it would adversely impact on residential areas.
- More comprehensive description of current site uses was requested.

21. Sorrel Lane
- There was some doubt expressed of the suitability of the site for a primary school, particularly due to the site’s current accessibility levels.

22. Leamouth Peninsula
- It was suggested that Leamouth South is also allocated as a site for redevelopment, particularly for new homes and other uses.
- Further detail on possible uses at this site was requested.

23. Reuters LTD
- It was suggested that this site has potential to create an area of habitat restoration.

24. Blackwall Reach Regeneration Project
- It was requested that the detail for this site should reflect the range of uses that will be required to come forward as part of the Blackwall Reach Regeneration Project.

25. Aspen Way
- Suggested uses included office, retail, housing and community uses.
- It was stated that there should any allocation should not promote the removal of existing DLR depot and offices. Also permanent structures are not allowed to be developed beneath or in close proximity to the railway viaduct.

26. Wood Wharf
- It was suggested that a district heating centre would not be appropriate in this site.
- Developers comments highlighted the appropriateness of residential uses at the site, but suggested that it would not be appropriate for family housing.

27. Billingsgate Market
- An objection was received to the inclusion of this site.
- Suggested site uses included office led mixed use development, retail, leisure and tall building, given its proximity to Canary Wharf.

28. Millennium Quarter
- The use of the area as residential led was supported.
- Other suggested uses included hotels, retail and leisure.
- The possibility of a district heating facility at this site were agreed with.

29. Westferry Printworks
- Inclusion of the site was welcomed and residential development was agreed with.
- There were mixed views on whether the site would be suitable for a school, it was considered that a primary school may be more appropriate for this site.

30. Crossharbour town centre
• There were requests for local shops to be protected and that this was more important than having a major town centre on the site.
• Support was shown for an Idea Store or leisure facilities on the site.

31. Marshwall East
• Comments expressed support for the allocation of a mix of uses.
• There was support shown for better linkages and connectivity around the dockside, between Canary Wharf and Wood Wharf, and to existing parks and public spaces on the Isle of Dogs.

District heating facilities focus areas
• Comments about the district heating facilities included agreement that the Bow Common Gas work site and Aldgate/Whitechapel places seem appropriate for this purpose.
• Potential linkages to the Barkentine Combined Heat Power (CHP) and new CHPs within Millwall
• A suggest for waterways to be considered for supporting district heating facilities.

Spatial Policy Areas

Spitalfields
• Support was expressed for Bishopsgate Corridor as a Preferred Office Location as it supports the overall business function of the City and the nearby Eastern Cluster.
• There was a concern that that the Activity Area as shown extends too far north beyond Bethnal Green Road

Bethnal Green
• It was suggested that Bethnal Green should be designated a Preferred Office Location (POL).
• An objection was made to the exclusion of the Bethnal Green civic cluster or hub

Tower of London
• There was an objection to the proposed designation of the easternmost Tower Gateway POL boundary. It was questioned whether any meaningful, large scale office accommodation could be delivered in this location due to the current proportion of residential use.
• It was requested that a reference to the Tower of London World Heritage Site Management Plan should be made.

Aldgate
• It was suggested that the University's building on Commercial Road should be included in the boundary
• Comments received agreed that the site is in a good location for hotel use and also for tall buildings.
• There were mixed comments about the proposed policy area, with some in support and others objecting to it.

Whitechapel
• A request was made for the District Centre to be expanded to include the wider place of Whitechapel, thereby including a number of potential development opportunity sites
It was suggested that the evidence for an Local Office Location (LOL) in Whitechapel was not very strong and this should be reviewed.

Wapping
- There was agreement for the CAZ boundary encompassing an important area in Wapping.
- There were mixed views on the need for tall buildings, which the local community particularly expressed little desire for.
- There were requests for more allotment areas in Wapping.

Shadwell
- It was suggested that a Conservation Area in the southern part of Shadwell, just north of The Highway, should be identified due to significant heritage buildings in the area.
- Comments included the need for open space to be protected and new development should improve new/existing open spaces.

Stepney
- Strengthening of policy to ensure more protection is given to historic assets was requested.
- It was suggested that all housing developments must provide play space, not necessarily within the development, but within the neighbourhood.

Limehouse
- Comments included the need for the character of the Limehouse Cut to be protected from inappropriate large-scale development.
- It was suggested that connections should be improved and reinforced in this place.

Fish Island
- There were requests to locally list a number of buildings in this place.
- Detailed modelling of sites to provide clarity on the capacity of a place to accommodate tall buildings was requested.

Mile End
- Comments included the need to improve the quality and usability of open spaces and this is more important that providing new open space.
- Support was expressed for a District Heating Facility in the area, provided there are takers for the alternative power supply

Bromley-by-Bow
- Objects to designation of Empson Street/St Andrew's Way as a Strategic Industrial Location (SIL) were made. It was suggested that the site is too close to residential and school to justify industrial use and associated traffic.
- It was requested that the DPD should promote provision of a well connected, legible area with safe and attractive routes for pedestrians and cyclists that connect through to the Regional Park, along the towpath, and with public transport.

Bow Common
- It was suggested that the Bow Common place is too large and the southern boundary should be the Limehouse Cut.
- There were some concerns raised over the Devons Road neighbourhood centre and the number of retail units than can be sustained.
Poplar
- Support was expressed for the designation of Poplar Business Park as an LIL
- It was suggested that the Poplar Spatial Policy Area should extend north to the Limehouse Cut.

Poplar Riverside
- Support was made for housing in the Leven Road Gas Work area.
- It was suggested that Sorrel Lane is unsuitable for a school due to pedestrian access and distance from community. Business or office development would be more suitable use.

Leamouth
- Requests for local views to be protected particularly those towards churches.
- Comments about tall buildings included that they should be closer to Canary Wharf and that should not be clustered as they effect sunlight and create wind tunnels.

Blackwall
- Requests to safeguard and improve open spaces in this place were made.
- It was suggested that the proposed LOL site at Blackwall does not perform this function and is less suited to the needs of the secondary and local office markets.

Canary Wharf
- It was suggested that site allocation needs to be amended to remove the Billingsgate Site.
- It was requested that Hertsmere House is removed from proposed POL into an area of development within the Activity Area and led by mixed use residential development.

Millwall
- Comments suggested that the area around Marsh Wall and Cuba Street, should be identified as a mixed use tall building cluster with building heights stepping down beyond this area to the south.

Cubitt Town
- Request that local views and views of the River Thames are protected.
- Support was shown for tall buildings in the Canary Wharf area, but getting progressively lower to respond to the surrounding scale of existing residential areas is a really good idea.
Development Management DPD

DM1 Development within the town centre hierarchy
- There was general agreement that policy should remain flexible to allow local solutions for development and be able to adapt to changing circumstances in an area.
- It was suggested that DM1 is the most appropriate policy to include further guidance for development of the cultural and leisure sector in town centres.

DM2 Markets
- There were mixed views on the importance of having a separate policy for markets, with some comments suggesting that this could be incorporated in other Council and policy documents and other comments suggesting that they should be considered separately from other town centre considerations.
- Clarification was sought on the planning policy management of ‘strategic markets’ in Tower Hamlets and how these can support town centre viability and promote the visitor economy outside the Central Activity Zone.

DM3 Protecting local shops
- It was suggested that policy should promote mixed use development at the edge of town centres and main streets and promote areas outside town centres primarily for residential use, including protecting uses such as local shops. Affordable housing and its provision should be a priority objective within mixed use developments in such locations.
- Suggestions were received that the policy should seek to protect local shops in conservation areas where the local shop plays an important role in defining the area's character.

DM4 Delivering the borough's housing requirements
- A number of comments suggested that there may be circumstances where the delivery of off site affordable housing creates a better solution and greater provision of affordable housing, although this was not agreed with by all.
- Clarity was requested as to whether the Council is seeking a target of 50% affordable housing for each scheme or if this is a more strategic borough wide target. Clarity needed about tenure split was also sought.

DM5 Housing standards and amenity space
- Flexibility in the policy, depending on the specific needs arising from the tenure and mix of housing provided was suggested.
- Comments provided suggested that formal play space should be provided where possible but should not always be required to be on site.
- Some support was shown for setting locally-specific housing and amenity space standards although it was suggested that as there are already strategic standards for open space and residential accommodation, meaning that further standards are unnecessary.

DM6 Supported housing
- Support for the policy was shown, although it should not restrict other forms of housing where loss of specialist and supported housing is unavoidable. Policy should recognise affordable housing could be provided as an acceptable alternative.

DM7 Student accommodation
• There was general agreement that Borough targets should not be set and appropriateness of proposals should be assessed on an individual basis as well as considering good transport accessibility.
• Whitechapel was considered an appropriate location for student housing.

**DM8 Short stay accommodation**
• There were mixed views on changing the use from hotels to non-employment uses. It was suggested that a flexible approach should be adopted to encourage provision rather than resist loss.
• Support was expressed for the continued provision of visitor accommodation.

**DM9 Contributing to healthy and active lifestyle**
• There were mixed views on the locations of hot food takeaway provision and whether they should be limited in a certain proximity of sensitive locations/uses.
• Comments suggested that policy should seek to protect existing social and community facilities and that new facilities should be encouraged.

**DM10 Improving the borough's air quality**
• Support for improving the borough's air quality was expressed, although mixed views were received on the need for local air quality standards.

**DM11 Protecting existing public open space**
• The policy intention was generally supported.
• It was suggested that policy should be flexible for development of affordable housing that outweighs the need to retain the open space.
• It was suggested that the quality of the blue open space, access and towpaths should be improved.

**DM12 Biodiversity and living buildings**
• Minimum levels of biodiversity enhancement were not generally accepted. Flexibility should be applied, recognising that some localities may make the inclusion of some measures less achievable/desirable.
• Accessibility to such areas by all users would not feasible in all cases, although should be encouraged where appropriate.
• Support was expressed for an approach to expect new developments to enhance the borough’s biodiversity. A suggestion recommended that the greening of the built environment is extended to include retrofitted buildings.

**DM13 Water spaces and flood prevention**
• The policy approach was generally supported
• Comments received suggested that it may be appropriate to limit or exclude access to the riverfront through the Thames Path for health and safety or operational reasons. Cases should be considered on a site by site basis.
• A specific recognition of treatment of borough's canals and docks was requested

**DM14 Minimising waste and maximising recycling**
• Overall approach was generally supported.
• It was suggested that the requirement for the provision of recyclable storage and composting spaces may not be possible in all developments and should be considered on a site by site basis.
DM15 Managing waste in borough
- It was recommended that policy for new waste management facilities should seek to ensure that the impacts are minimised through containment within suitable buildings/structures and include appropriate pollution prevention measures and a high quality design.
- Comments were received supporting waterborne transport of waste material.

DM16 Local job creation and investment
- Support was expressed for the protection of employment uses in appropriate areas, although it was suggested that outside of these there should be greater flexibility where it can be demonstrated that there is no longer a need.
- It was requested that the policy should make clear that local employment uses extend beyond office uses.

DM17 Office locations
- Comments generally suggested that 2 years is too long a period to demonstrate that existing employment floorspace in unviable. A number of comments suggested this should be shortened to 6-9 months.
- There were suggestions that a level of flexibility should be implemented in LOLs, so as not to be restricted to the retention of office use.

DM18 Local industrial locations
- There were mixed views expressed on a requirement for no net loss of industrial employment floorspace. There were some suggestions that exceptions could be added to the policy.
- It was suggested that types of employment use that should be allowed in a Local Industrial Location (LIL) should be flexible to allow for dynamic response to the changing market.

DM19 Delivering a network of schools and lifelong learning opportunities for the borough
- It was suggested that all education development should be supported.
- When planning for new or extending existing schools, existing and future capacity of school places across all public and private education should be considered in order to properly plan for provision when considering development proposals.

DM20 Further and higher education
- It was suggested that higher education establishments and additional further education establishments in the borough do not need to be focussed to meet the needs of local students. It is a London-wide issue.

DM21 Integrating development with a sustainable transport network
- It was suggested that expecting public transport to accommodate all additional journeys generated by a proposed development was unrealistic and that a balanced approach across all modes of transport would be appropriate based on the circumstances of each case.
- Comments on Transport Assessments included that these should only be required where there is a material change in transport circumstances.

DM22 Sustainable transport of freight
- Comments made included support for a policy requiring consideration of the use of rail or waterborne freight transport.
- The principle of promoting freight consolidation centres was supported, although the circumstances would need to be considered in each case.
DM23 Parking
- There was general agreement that the need for parking, use of car clubs and electric and low emission vehicles should be assessed on a site by site basis.
- A request was made for consultation in respect of the detailed parking standards as these are developed.
- It was suggested that there should be exceptions to parking policy for large family units and disabled places.

DM24 Streets, places and public realm for people
- There was general agreement that urban design analysis is useful however, it was suggested that a similar process is already carried out in Design and Access Statements and therefore considered excessive.
- It was suggested that a Street Manual is produced which outlines the Council’s requirements and tailored to different parts of the Borough.

DM25 Tower of London World Heritage Site
- A number of comments expressed the view that there are adequate safeguards in place and do not warrant a separate policy for its protection, although this was not agreed with by all.
- It was recommended that policy should encourage and favour developments which generally improve the urban environment in the vicinity of the World Heritage Site, thereby enhancing its setting.

DM26 Heritage and the historic environment
- Comments received said that specific criteria are unnecessary and applications should be assessed on a case by case basis with the objective of preserving heritage value where possible.
- It was suggested that the process of adapting a heritage building should be developed in discussion with heritage bodies. Policy should be flexible enough to deal with individual circumstances.

DM27 Sustainable neighbourhoods and place sensitive design
- Further guidance was requested for ‘visual privacy and overlooking’ to ensure that this is not used too prescriptively for dense urban settings.
- Comments about renewable technologies advised that they are not sufficiently advanced and can only support existing forms of energy to a limited capacity, therefore unrealistically low carbon policies should not be adopted.

DM28 Tall buildings
- Mixed views were received on setting of building heights. Some views were that rigid definitions of tall buildings would not be supported but should be considered on a site by site basis. Others suggested that policy should be developed to enable an assessment of the individual circumstances of a site.
- Tall buildings will be appropriate in the major economic hubs, consideration to the effect on surrounding areas and the effect on the resident population should be made.
- It was requested that expansion on acceptability of redevelopment of existing tall buildings is made, particularly where the council no longer consider these locations to be acceptable for tall buildings.

DM29 A zero-carbon borough
- A number of comments received outlined that exceeding the carbon dioxide emission reduction targets outlined in the Draft London Plan were unnecessary and possibly not achievable.
There was general agreement that it is not appropriate to require new developments to include provision to connect to district heating schemes. Connection should be on a case by case basis.

**Fish Island AAP**
A separate consultation summary report is being produced which highlights the comments received during consultation and will be made available on the Tower Hamlets website.

**Public consultation events feedback**
Pre-consultation was undertaken in late 2010 to establish how the public wanted to be consulted. Feedback included the desire to be consulted on a more local basis. In response to this the Council undertook consultation on a ‘place by place’ basis, taking locally relevant policies to the places where they would be implemented.

The Council carried out a total of 26 consultation events attended by over 250 people. The events included workshops discussing each of the ‘Places’ of Tower Hamlets, ‘drop in sessions’ in town centres and specific events targeting local businesses, faith groups and young people. A large number of written representations from statutory consultees and developers have also been received.

At each event attendees were asked to comment on the consultation activity, including how they felt it had been organised, the materials used and the event overall. Responses were generally positive and the outcomes included the following:

- 84% of respondents said that the event as a whole was good or excellent
- 77% of respondents said that the structure of the event was good or excellent
- 83% of respondents said that the event organisation was good or excellent

Some areas of improvement were identified, including the types of materials used. Although no-one rated them as poor or very poor, nearly 30% felt that they were average, suggesting that there is room for improvement. A number of comments provided suggested that more copies of the documents were needed. Another area identified for improvement included suitability of venues and suggestions made will be taken into consideration.

The comments received will be used to improve consultations in the future.

**Next Steps**
Alongside the updated evidence base, the information provided by the representations and information provided by the consultation events are being used to inform the Proposed Submission Version of the Managing Development DPD (the Sites and Placemaking and Development Management Development Plan Documents have been combined to form the Managing Development DPD).

It is intended that the submission draft DPDs will be considered by Cabinet and full Council in December 2011, following which the public, landowners, developers, businesses and key stakeholders can raise any formal objections on the DPDs. Any objections which cannot be resolved will be considered at an Examination In Public (EIP), held by an independent Inspector, which is scheduled for summer 2012.

Information received is also being used to inform the development of other projects, strategies and programmes across the borough where appropriate.