



## **London Borough of Tower Hamlets**

### **New Local Plan 2031: Managing growth and sharing the benefits**

#### **Regulation 22 Consultation Statement**

A summary report of the public consultation on the new Local Plan 2031

**February 2018**

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## 1. Introduction

**1.0** The London Borough of Tower Hamlets (LBTH) is in the process of developing a new Local Plan to positively plan and manage future development until 2031. This statement summarises the stages of public consultation undertaken in line with the applicable Town and Country Planning (Local Planning) (England) Regulations 2012 (TCPA Regulations) as follows:

- Stage 1: (Regulation 18) Initial call for views.
- Stage 2: (Regulation 18) Tower Hamlets Draft Local Plan 2031: Managing growth and sharing the benefits.
- Stage 3: (Regulation 19) Proposed submission draft Tower Hamlets Local Plan: Managing growth and sharing the benefits and responses pursuant to Regulation 20.

**1.1** To satisfy Regulation 22(C) of the TCPA Regulations, LBTH has prepared this statement which sets out:

- which bodies and persons were invited to make representations under regulations 18 and 20;
- how these bodies and persons were invited to make representations under Regulations 18 and 20;
- a summary of the main issues raised by the representations; and
- how the representations have been taken into account.

**1.2** Activities undertaken for each consultation stage have been completed in accordance with the following legislation and guidance:

- The Town and Country Planning (Local Planning) (England) Regulations 2012 (TCPA Regulations) which defines the consultation procedures local planning authorities must follow when preparing a Local Plan.
- The Localism Act 2011 which sets out the legal duty to co-operate between local planning authorities and other public bodies to maximise the effectiveness of policies covering strategic matters in Local Plans.
- Paragraph 17 of the National Planning Policy Framework (NPPF) which empowers ‘local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area’.
- The Tower Hamlets Statement of Community Involvement Refresh (adopted in September 2017) which specifies the principles of community involvement in Tower Hamlets. With regard to Local Plan preparation, this statement explains when and how we will consult the community and who we will involve in this process.

**1.3** The preparation of the Local Plan has been through the following rounds of consultation in line with the TCPA Regulations:

Stage	Regulation	Title	Nature of the stage	Period
Stage 1.	Regulation 18	Our Borough, Our Plan: A New Local Plan First Steps.	Scoping - views were sought on what the plan should contain and the issues it should address.	Monday 14 <sup>th</sup> December 2015 to Monday 8 <sup>th</sup> February 2016.

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<b>Stage 2.</b>	Regulation 18	Tower Hamlets Draft Local Plan 2031: Managing growth and sharing the benefits.	Plan Preparation - views were sought on the draft vision, objectives and detailed wording of the policies including the council's preferred list of sites.	Friday 11 <sup>th</sup> November 2016 to Tuesday 2 <sup>nd</sup> January 2017.
<b>Stage 3.</b>	Regulation 19 and 20	Tower Hamlets Local Plan: Managing growth and sharing the benefits.	6-week consultation on the pre-submission version of the Local Plan. Representations made to this consultation period are made under regulation 20.	Monday 2 October 2017 and Monday 13 November 2017.

**1.4** The 'specific consultation' bodies LBTH has consulted with (as stipulated in the Regulations) are listed in Appendix 1. 'The general consultation' bodies that LBTH has consulted with are listed in Appendix 2. These lists are considered largely to be a definitive list of all bodies consulted, not accounting for updates to the consultation database (i.e. requests for amendments/deletion of details) following each consultation stage. In addition to these general consultation bodies, a number of individual consultees have also been consulted at each stage.

**1.5** LBTH published two consultation summary reports on the consultation undertaken during stages 1 and 2 in accordance with Regulation 18 of the TCPA Regulations. These reports detail consultation activities undertaken, a summary of responses and the main issues raised by respondents for each round. This report summarises the findings discussed in these reports to satisfy the requirements of regulation 22(c) of the TCPA Regulations in regards to consultation undertaken in accordance with Regulation 18 of the TCPA Regulations.

### Statement of Community Involvement

**1.6** LBTH's Statement of Community Involvement (SCI) Refresh sets out how the community can get involved in the preparation of local planning policy documents and decisions on planning applications. Each stage of consultation on the proposed Local Plan was carried out following the approach set out in the SIC.

## **2. Duty to Cooperate**

**2.0** The duty to cooperate was introduced in the Localism Act 2011. It places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local preparation in the context of strategic cross boundary matters.

**2.1** LBTH held a series of meetings with planning officers from neighbouring planning authorities (including City of London, Newham, Greenwich, Hackney and the London Legacy Development Corporation) and the Greater London Authority to discuss Local Plan cross-boundary issues in line with the duty to cooperate throughout all local plan consultation stages. Further details on the duty to cooperate are published in the Duty to Cooperate Statement (October 2017).

**2.2** For the purposes of the duty to cooperate the prescribed bodies are:

- Environment Agency.
- Sport England.
- English Heritage.
- Natural England.
- Mayor of London.
- Civil Aviation Authority.
- Homes and Communities Agency.
- NHS Tower Hamlets.
- Network Rail.
- Office of Rail Regulation (now office of Rail and Road).
- Transport for London
- Highways Agency
- London Enterprise Panel
- London Local Nature Partnership
- Private sector utility providers.
- Marine Management Organisation.

## **3. Stage 1 and 2 of Plan Preparation (Regulation 18)**

### **3.0 Introduction**

**3.0.1** In the early stages of the plan preparation two stages of public consultation were undertaken in order to satisfy the requirements of Regulation 18 of the TCPA Regulations. Regulation 18 requires local authorities to notify interested parties and individuals, including prescribed bodies in the regulations when a local plan is being prepared. The local authority is required to invite those notified to make representations on the plan and to take these representations into consideration under this regulation.

**3.0.2** Stage 1 (Regulation 18) of the early preparation process undertook an initial call for views from the public on the document entitled "Our Borough, Our Plan: A New Local Plan First Steps". This document contained a summary of key issues facing the borough, outlined what the plan should contain and how these issues can be addressed over the next 15 years. This consultation period ran from the 14<sup>th</sup> December 2015 until the 8<sup>th</sup> February 2016.

3.0.3 Stage 2 (Regulation 18) of the early preparation process undertook a more focused consultation exercise with the public. This consultation sought views on the draft vision and objectives for how the borough will grow and develop in the future, detailed wording of policies and the council's preferred list of sites, outlined in the document entitled "Tower Hamlets Draft Local Plan 2031: Managing growth and sharing the benefits". This consultation period ran from Friday 11<sup>th</sup> November 2016 to Tuesday 2<sup>nd</sup> January 2017.

3.0.4 These consultation exercises, plus other ongoing engagement with stakeholders, meet the requirements of Regulation 18 of the TCPA Regulations. This chapter summarises these consultation stages.

### **3.1 Consultation Methods**

#### **3.1.1 Website:**

3.1.1.1 A dedicated webpage entitled 'A New Local Plan' was provided throughout all stages of consultation to facilitate consultation on the development of the new local plan. This webpage was advertised on the council's planning policy and guidance webpage on the Tower Hamlets website. This page provided access to all versions of the Local Plan, including the 'Our Borough, Our Plan: A New Local Plan First Steps' (stage 1) and 'Tower Hamlets Draft Local Plan 2031: Managing growth and sharing the benefits' (stage 2).

This page can be viewed via the following link:

[http://www.towerhamlets.gov.uk/lgn/council\\_and\\_democracy/consultations/past\\_consultations/Local\\_Plan.aspx](http://www.towerhamlets.gov.uk/lgn/council_and_democracy/consultations/past_consultations/Local_Plan.aspx)

3.1.1.2 This webpage advertised all consultation activities and included a link to the council's online consultation portal where the public could submit comments on both documents. This portal contained extensive information including an explanation of how the public could get involved, submit comments on the documents, read all evidence supporting both consultation documents and the dates of all consultation events and exhibitions.

This page can be viewed by accessing the below link:

<http://towerhamlets-consult.objective.co.uk/portal>

#### **3.1.2 Summary Booklets**

3.1.2.1 Booklets summarising each consultation document were created entitled 'A New Local Plan First Steps Summary Booklet' and 'Summary of the Draft Local Plan 2031: Managing Growth and Sharing the Benefits Summary Booklet'. These booklets were distributed to the borough's idea stores and libraries during the respective consultation stages. The booklets were also made available at all consultation events and meetings.

#### **3.1.3 Libraries and Idea Stores:**

3.1.3.1 Hard copies of each consultation documents and supporting evidence were made available at the Town Hall (Mulberry Place), Cubitt Town Library, Bethnal Green Library, Local History and Archives Library and Idea Stores (located throughout the borough).

3.1.4 Online Questionnaire:

3.1.4.1 An online questionnaire with 25 questions was published on the new Local Plan webpage to seek feedback on the planning policies outlined in the consultation documents.

3.1.5 Emails and Letters:

3.1.5.1 Emails and letters were sent to local residents, business, community organisations, housing providers, neighbouring planning authorities, stakeholders and the wider community. The specific and general consultees are listed in appendices 1 and 2 of this statement.

3.1.5.2 Everyone registered on the council’s planning policy database, who expressed an interest in the progress of the Local Plan and other planning policy documents were notified. A freepost address was made available for receiving written comments and publicised consultation documents, e-mails, posters and leaflets.

3.1.6 Press and Media Coverage:

3.1.6.1 Notices and articles were advertised in local newspapers and websites for both stages of consultation featuring information on the consultation documents, as detailed below:

<b>Stage 1 (Regulation 18): Our Borough, Our Plan: A New Local Plan First Steps</b>	
<b>Paper/Website/Organisation</b>	<b>Details &amp; Duration</b>
East End Life	Public consultation notice featured on 14 December 2015
East End Life	News article featured on 30 November 2015 and 7 and 14 December 2015
East London Advertiser	News article featured on 12 January 2016
East London Lines	News article featured on 15 January 2016
<b>Stage 2 (Regulation 18): Draft Tower Hamlets Local Plan: Managing growth and sharing the benefits</b>	
<b>Paper/Website/Organisation</b>	<b>Details &amp; Duration</b>
East London Advertiser	Public consultation notice featured on 10 November 2016
East London Lines	News article on 12 December 2016
The Wharf newspaper	Online article and printed article on December 2016.
Roman Road Trust	A community organisation representing local residents and business in Bow publicised consultation workshops on 30 November 2016.
Eventbite	Company used to publicise workshops, exhibitions and drop-in-sessions over the consultation period for each stage.
Bengali newspapers	Bangla Times, Weekly Janomot, Weekly Desh and Weekly Potrika.

3.1.6.2 Twitter, facebook and Instagram were used to promote consultation events for both stages of consultation undertaken. The twitter account @TowerHamletsNow was set up and LBTH sent out 38 topic-based tweets to raise awareness of the stage 1 (Regulation 18) consultation round. This resulted in 58,118 impressions and 1,088 engagements. 37 tweets were sent out during the stage 2 (Regulation 18) consultation round and these received 1,043 engagements and 62 retweets.

3.1.6.3 Advertisements were placed on bus stops within the borough throughout the stage 1 (Regulation 18) consultation round.

3.1.6.4 The Tower Hamlets Draft Local Plan 2031: Managing growth and sharing the benefits (Regulation 18) document was featured in the Tower Hamlets E-bulletin and was circulated to 9,207 residents, organisations and individuals who subscribe to the bulletin on 15<sup>th</sup> November 2016.

3.1.6.5 Furthermore, community information panels were placed at various locations throughout the borough for two weeks from the 6<sup>th</sup> December informing the public of consultation activities for the stage 2 (Regulation 18) consultation round.

### 3.2 Consultation Events

3.2.1 Throughout both rounds of consultation, LBTH held a series of public consultation events to proactively engage with residents, local organisations, businesses and the wider community. Officers from the council attended events in order to answer questions, promote discussion and receive comments. All comments have been reviewed and have helped to shape the proposed submission version of the new local plan.

#### 3.2.2 Public Exhibitions and Drop-in Sessions

3.2.2.1 LBTH organised public drop-in sessions providing an opportunity for members of the community and everyone with an interest to find out information about each stage of the local plans development, ask questions and provide comments. Below is a summary of the dates and locations where public drop-in sessions took place during stages 1 and 2 of the preparation process:

<b>Stage 1 (Regulation 18): Our Borough, Our Plan: A New Local Plan First Steps</b>		
<b>Date</b>	<b>Time</b>	<b>Venue</b>
Thursday 24 November 2016	12.30pm – 3.30pm	Idea Store, Poplar
Saturday 26 November 2016	10am – 1pm	Idea Store, Bow
Saturday 3 December 2016	10am – 1pm	Victoria & Albert Museum of Childhood, Bethnal Green
Wednesday 7 December 2016	5.30pm – 8.30pm	Alpha Grove Community Centre, Isle of Dogs
Wednesday 14 December 2016	5.30pm – 8.30pm	Idea Store, Whitechapel
<b>Stage 2 (Regulation 18): Tower Hamlets Local Plan: Managing growth and sharing the benefits</b>		
<b>Date</b>	<b>Time</b>	<b>Venue</b>
Thursday 14 January 2016	11.30am-2.30pm	Idea Store, Chrisp Street, Poplar
Saturday 16 January 2016	10am-1pm	V&A Museum of Childhood, Bethnal Green
Thursday 21 January 2016	5.30-8.30pm	Alpha Grove Community Centre, Isle of Dogs
Thursday 28 January 2016	5.30-8.30pm	Idea Store, Whitechapel
Saturday 30 January 2016	10am-1pm	Idea Store, Roman Road, Bow

#### 3.2.3 Workshops and Meetings

3.2.3.1 LBTH held two workshops for each stage of the Regulation 18 consultation rounds. These workshops are summarised in the below table:



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<b>Stage 1 (Regulation 18) Our Borough, Our Plan: A New Local Plan First Steps</b>		
<b>Type of Workshop</b>	<b>Date</b>	<b>Discussion Topics</b>
Council members workshop	17 January 2015	This workshop focused on the creation of a shared strategic vision for the borough and identified strategic objectives for the Local Plan.
Internal stakeholders workshop	2 March 2015	This workshop focused on an analysis of the existing Local Plan policies to understand what worked well and identify gaps and areas for improvement.
<b>Stage 2 (Regulation 18) Tower Hamlets Draft Local Plan 2031: Managing growth and sharing the benefits.</b>		
<b>Type of Workshop</b>	<b>Date &amp; Venue</b>	<b>Discussion Topics</b>
City Fringe and Central Area public workshop.	13 December 2016	Officers from the Council gave presentations on the background to the local plan and key issues and residents gave their views on these issues. The workshop was facilitated by an independent facilitator to in order to provide impartiality and expertise in obtaining participation and feedback from participants
Isle of Dogs, South Poplar and Lower Lea Valley area public workshop	19 December 2016	
Neighbouring planning and draft Local Plan workshop	1 August 2016.	Representatives from four neighbourhood forums - Limehouse, Spitalfields, East Shoreditch and Isle of Dogs - were invited to a workshop to debate key issues on the draft Local Plan. An independent facilitator was present along with councillor Rachel Blake (cabinet member for strategic development and waste) and officers from the council.
Member's workshop	Wednesday 27 July & 27 September 2016.	The workshop sought views from all council members.

3.2.3.2 LBTH held a number of focus groups throughout both stages of Regulation 18 consultation to encourage discussion and gather feedback on key issues from key organisations and groups. Below is a summary of these meetings:

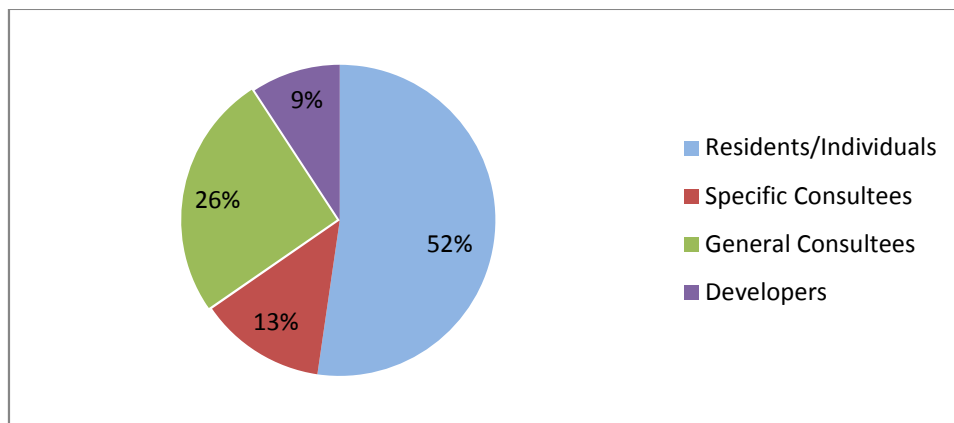
<b>Conservation and Design Advisory Panel</b>	
<b>Details</b>	<b>Date of meetings</b>
Conservation and Design Advisory Panel - CADAP is made up of independent members from a range of disciplines including architecture, urban design, landscape architecture, planning and regeneration who work in the borough.	Stage 1 (Regulation 18) Consultation Round: 14 December 2015
	Stage 2 (Regulation 18) Consultation Round: 10 October 2016
<b>Developers Forum</b>	
<b>Details</b>	<b>Date of meetings</b>
Key developers, landowners and agents were invited to a focus group.	Stage 1 (Regulation 18) Consultation Round: 21 January 2016.
	Stage 2 (Regulation 18) Consultation Round: 9 December 2016.
<b>Health and Wellbeing Board</b>	
<b>Details</b>	<b>Date of meetings</b>
A partnership bringing together councillors, community organisations, public health, social care and housing providers in one forum.	Stage 1 (Regulation 18) Consultation Round: 12 January 2016.
	Stage 2 (Regulation 18) Consultation Round: 13 March 2016.
<b>Tower Hamlets Housing Forum (THHF)</b>	
<b>Details</b>	<b>Date of meetings</b>
THHF is a partnership between registered housing providers and the council	Stage 1 (Regulation 18) Consultation Round: 1 February 2016.
	Stage 2 (Regulation 18) Consultation Round: 1 December 2016.

Tower Hamlets Youth Council	
Details	Date of meetings
Tower Hamlets Youth included candidates for the young mayor election in 2017 and represented views of the youth in the borough.	Stage 1 (Regulation 18) Consultation Round: 20 January, 27 January & 3 February 2016.
	Stage 2 (Regulation 18) Consultation Round: 17 November 2016.
Local Voices	
Details	Date of meetings
An independent group made up of disabled people from across the borough.	Stage 2 (Regulation 18) Consultation Round: 19 December 2016.

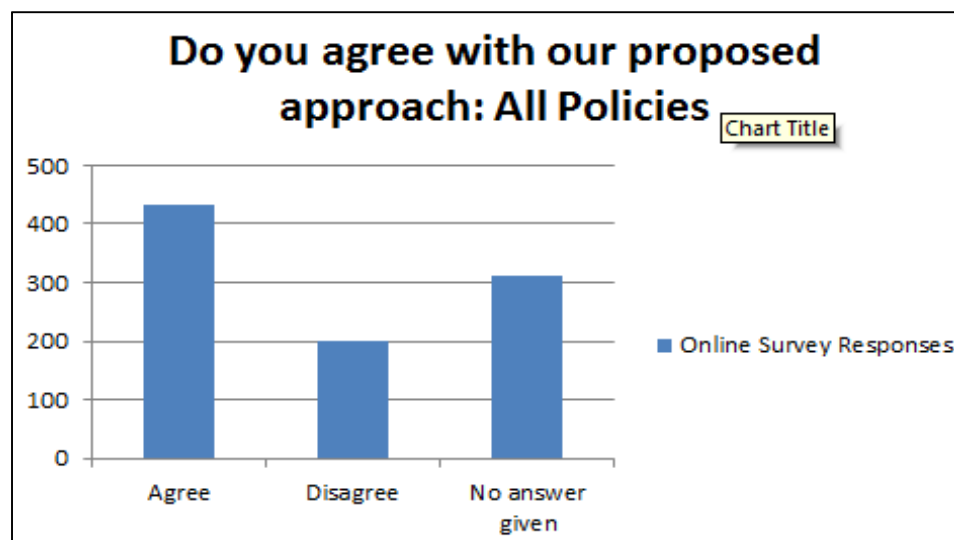
#### 4. Stage 1 (Regulation 18): Consultation Responses Summary

##### 4.0 Overview

4.0.1 The stage 1 (Regulation 18) consultation round resulted in 130 written representations including 70 e-mails, 3 letters, 11 representation forms submitted during public drop-in sessions and 46 online questionnaires. The representations consisted of 1,235 individual comments on specific topic areas. As illustrated in the graph below, the majority of respondents are residents/individuals in the borough.



4.0.2 The graph below provides an overview of online questionnaires responses on whether respondents agree or disagree with our proposed approaches to the emerging policies.



## 4.1 Summary of Representation Responses

4.1.1 Key issues raised by respondents during this stage of consultation included a need to ensure the plan can sustainably manage growth in the borough. Housing and employment growth requirements and the ability to deliver associated soft and hard infrastructure to support growth sustainably were highlighted as being particularly important by respondents.

4.1.2 A summary of the main issues raised during this public consultation round held from Monday 14<sup>th</sup> December 2015 to Monday 8<sup>th</sup> February 2016 and the council's response to these is provided in the tables below.

Comments on Tower Hamlets New Local Plan: Vision	
Summary of the comments	LBTH's response
<ul style="list-style-type: none"> <li>The new Local Plan needs to better manage the levels of growth coming forward, to make sure it can be supported by infrastructure.</li> <li>Ensure new development supports integrated socially mixed communities.</li> <li>Secure new housing that is truly affordable for the borough's residents.</li> <li>Ensure new development is well-designed, sustainable and supported by sufficient infrastructure, including transport and community facilities for all ages.</li> <li>Protect the boroughs distinctiveness and assets, from the negative effects of inappropriate tall high density developments.</li> <li>Identify and promote cross-boundary opportunities by working collaboratively with neighbouring boroughs and other partners.</li> </ul>	<ul style="list-style-type: none"> <li>Review the borough's growth potential for housing and employment. To ensure that it can be supported by appropriate infrastructure and meet the needs of both existing and future communities.</li> <li>Introduce four cross-cutting themes derived from the Strategic Plan to promote sustainable growth, climate change adaptation and mitigation, improving residents' health and wellbeing and reducing inequalities.</li> <li>Create a coherent spatial strategy that incorporates the borough's existing places and provides a framework of area specific priorities and principles that new development will take account of and help deliver.</li> </ul>

Comments on Tower Hamlets New Local Plan: Design and Historic Environment	
Summary of the comments	LBTH's response
<ul style="list-style-type: none"> <li>Protect the Borough's unique and distinctive character.</li> <li>Proactively manage new development to ensure they are sympathetic to existing local character and context.</li> <li>Better protect historic assets and dockland heritage;</li> <li>Manage and focus the development of tall and high density buildings;</li> <li>Ensure developments are built to a high quality standard and incorporate innovative solutions to the challenge of city living;</li> <li>Plan for improvements to the area around Tower of London World Heritage site;</li> <li>Review the conservation strategy and local list</li> <li>Support alterations and extensions in homes in conservation areas to support growing families.</li> </ul>	<ul style="list-style-type: none"> <li>Visualise the historic context (e.g. local views, landmarks, and skyline) and local context (characteristics of places).</li> <li>Identify appropriate and suitable locations for tall buildings by taking considerations of infrastructure needs.</li> <li>Identify local criteria for determining when exceptional densities will be considered.</li> <li>Consider innovative design by linking with smart city principles</li> <li>Introduce a new policy to enable building alterations and extensions.</li> </ul>

Comments on Tower Hamlets New Local Plan: Housing	
Summary of the comments	LBTH' response
<ul style="list-style-type: none"> <li>New homes are not considered affordable. Need to deliver genuinely affordable homes</li> </ul>	<ul style="list-style-type: none"> <li>Require all new housing developments to secure contribution to the delivery of</li> </ul>

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<p>including social and affordable rent.</p> <ul style="list-style-type: none"> <li>• Protect the unit mix of existing housing estates.</li> <li>• Ensure the existing community are better involved in planning for new homes, particularly estate regeneration.</li> <li>• Secure greater variety of housing types and range of sizes, particularly for families.</li> <li>• Make provisions for specialist housing to accommodate older persons and students.</li> <li>• Better manage and control tall high density housing development.</li> <li>• New homes need to be better designed to improve long term liveability, this includes more innovate and efficient waste and servicing, affordable homes built to the same standards as market homes, and more integrated useable open space and children's play .</li> </ul>	<p>affordable homes that meets the local need such as family homes and homes for those with disabilities.</p> <ul style="list-style-type: none"> <li>• Prioritise the delivery of genuinely affordable homes including social and affordable rent.</li> <li>• Increase housing options and secure mixed and balanced communities as well as inclusive and liveable.</li> <li>• Deliver housing growth to meet general and specialised housing demand in line with London Plan housing targets.</li> <li>• Ensure that all housing in Tower Hamlets is high quality, well-designed, energy efficient, sustainable and durable; and</li> <li>• Continue to support delivery of adequate living environment with associated private and communal amenity space.</li> <li>• Aim to provide a mix of unit sizes to support different types of businesses.</li> <li>• Enhance the role of markets, including the potential for new and expanded markets, to add vitality and support new businesses.</li> </ul>
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<b>Comments on Tower Hamlets Local Plan: Economy and Jobs</b>	
<b>Summary of the comments</b>	<b>LBTH's response</b>
<ul style="list-style-type: none"> <li>• Maintain protection of key designated employment areas such as Canary Wharf and the borough's industrial areas.</li> <li>• Protect and secure affordable workspace for small and medium size businesses and suggest appropriate locations where it could be provided.</li> <li>• Protect office space when permitted development rights are extended.</li> <li>• Utilise town centres to provide workspace, such as Whitechapel.</li> <li>• Support the upskilling of local residents.</li> <li>• Ensure a mix of employment types and uses.</li> <li>• Encourage creative jobs for artists and craftspeople, not just in tech industries.</li> </ul>	<ul style="list-style-type: none"> <li>• Protect the borough's office and industrial land and buildings including Canary Wharf.</li> <li>• Explore the introduction of a new policy to promote the provision of a range of workspaces in new developments to meet the needs of small start-up and grow-on businesses.</li> <li>• Promote and secure the provision of different types and sizes of workspace to facilitate a range of job types for local people to access.</li> <li>• Support the provision of learning and training facilities of different types, so that local people are better enabled to access local employment.</li> <li>• Support the provision of new employment space across the borough, which could facilitate the clustering of particular industries.</li> </ul>

<b>Comments on Tower Hamlets New Local Plan: Town Centres</b>	
<b>Summary of the comments</b>	<b>LBTH's response</b>
<ul style="list-style-type: none"> <li>• Enhance the borough's town centres and review their status.</li> <li>• Local shops, markets and public houses should be protected.</li> <li>• Independent shops and restaurants should be prioritised over chains.</li> <li>• Encourage a wide range of uses in town centres.</li> <li>• Restrict hot food takeaways, betting offices and pay-day loan shops.</li> <li>• Protect affordable workspace and retail units including ground floor shops.</li> </ul>	<ul style="list-style-type: none"> <li>• Review all town centre boundaries to inform the existing town centre hierarchy and development capacity.</li> <li>• Support proposals that improve the appearance and character of town centres.</li> <li>• Support protection of uses where they remain viable, which might include article 4 directions to remove permitted development rights.</li> <li>• Seek to enhance the borough's town centres by promoting diverse uses and protect certain uses from over-concentration, encouraging more people to shop locally.</li> <li>• Aim to provide a mix of unit sizes to support</li> </ul>

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	<p>different types of businesses.</p> <ul style="list-style-type: none"> <li>Enhance the role of markets, including the potential for new and expanded markets, to add vitality and support new businesses.</li> </ul>
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Comments on Tower Hamlets New Local Plan: Community Facilities	
Summary of the comments	LBTH's response
<ul style="list-style-type: none"> <li>Provide additional school places, health and social care facilities including medical centres, community centres and sports facilities to support housing growth.</li> <li>Protect existing facilities and include policies that help them improve and expand.</li> <li>Support facilities that enhance community cohesion such as community allotments and gardens and youth clubs.</li> <li>Protect the borough's arts and cultural venues and pubs.</li> <li>Protect existing social and recreational facilities and include policies that support the delivery of improved and new facilities for all ages and needs.</li> </ul>	<ul style="list-style-type: none"> <li>Focus on promoting a range of facilities, including health and social care units, which are accessible to different ages and groups in Tower Hamlets.</li> <li>Introduce a new policy for strengthening protection of different types of community facilities.</li> <li>Support provision for social infrastructure to areas experiencing high level of growth.</li> <li>Identify and assess sites which could be allocated for new or improved community facilities and social infrastructure as part of site allocations.</li> </ul>

Comments on Tower Hamlets New Local Plan: Open Space	
Summary of the comments	LBTH's response
<ul style="list-style-type: none"> <li>Better protection for wildlife, particularly in and around the Thames and other water courses.</li> <li>Include updated climate change allowances in flood modelling.</li> <li>Balance climate change considerations against the need to provide new homes.</li> <li>Improving air quality in the borough, especially near major roads.</li> <li>Increasing urban greening and street trees.</li> <li>Need improved policies on wind and other micro-climate effects.</li> <li>Reduce carbon emissions, especially through transport policies, by retaining the existing zero carbon homes policy and through retro-fitting existing homes.</li> <li>Ensure adequate and sustainable clean and waste water capacities, especially on the Isle of Dogs.</li> </ul>	<ul style="list-style-type: none"> <li>Strengthen the air quality policy to reduce the impact of new development.</li> <li>Strengthen biodiversity policies to include further urban greening measures.</li> <li>Introduce a new policy to protect and increase numbers of street trees.</li> <li>Prevent development from increasing flood risk.</li> <li>Promote sustainable water management.</li> <li>Maintain our existing zero carbon policy for all residential developments from 2016 and non-residential developments from 2019.</li> <li>Reduce microclimate effects, including heat island effect and from wind.</li> <li>Strengthen waste policy, including waste management and waste water disposal.</li> </ul>

<b>Comments on Tower Hamlets New Local Plan: Environmental Sustainability</b>	
<b>Summary of the comments</b>	<b>LBTH's response</b>
<ul style="list-style-type: none"> <li>• Better protection for wildlife, particularly in and around the Thames and other water courses.</li> <li>• Include updated climate change allowances in flood modelling.</li> <li>• Balance climate change considerations against the need to provide new homes.</li> <li>• Improving air quality in the borough, especially near major roads.</li> <li>• Increasing urban greening and street trees.</li> <li>• Need improved policies on wind and other micro-climate effects.</li> <li>• Reduce carbon emissions, especially through transport policies, by retaining the existing zero carbon homes policy and through retro-fitting existing homes.</li> <li>• Ensure adequate and sustainable clean and waste water capacities, especially on the Isle of Dogs.</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthen the air quality policy to reduce the impact of new development.</li> <li>• Strengthen biodiversity policies to include further urban greening measures.</li> <li>• Introduce a new policy to protect and increase numbers of street trees.</li> <li>• Prevent development from increasing flood risk.</li> <li>• Promote sustainable water management.</li> <li>• Maintain our existing zero carbon policy for all residential developments from 2016 and non-residential developments from 2019.</li> <li>• Reduce microclimate effects, including heat island effect and from wind.</li> <li>• Strengthen waste policy, including waste management and waste water disposal.</li> </ul>

<b>Comments on Tower Hamlets New Local Plan: Transport and Connectivity</b>	
<b>Summary of the comments</b>	<b>LBTH's response</b>
<ul style="list-style-type: none"> <li>• Greater emphasis to prioritise sustainable transport modes, walking, cycling and public transport.</li> <li>• Promote other initiatives to reduce car dependence such as car clubs, and river travel.</li> <li>• Need for transport infrastructure improvements, increased frequency and capacity.</li> <li>• Additional river and road crossings to increase connectivity within the borough and to adjacent neighbouring boroughs including at Tower Hill, Whitechapel, A11, A13 and on the Isle of Dogs.</li> <li>• Improvements to health through promoting active travel and reducing car emissions, which in turn improves air quality.</li> </ul>	<ul style="list-style-type: none"> <li>• Promote a sustainable pattern of development, minimising the need to travel and reducing dependence on the private car.</li> <li>• Prioritise walking, cycling and public transport to help reduce congestion and poor air quality.</li> <li>• Provide a safe and accessible environment to encourage walking, cycling, and physical activity and improve the health of residents.</li> <li>• Improve the capacity on the road network; promote use of the River Thames as a strategic transport route for passengers and freight.</li> <li>• Improve the quality, reliability and efficiency of the road network.</li> </ul>

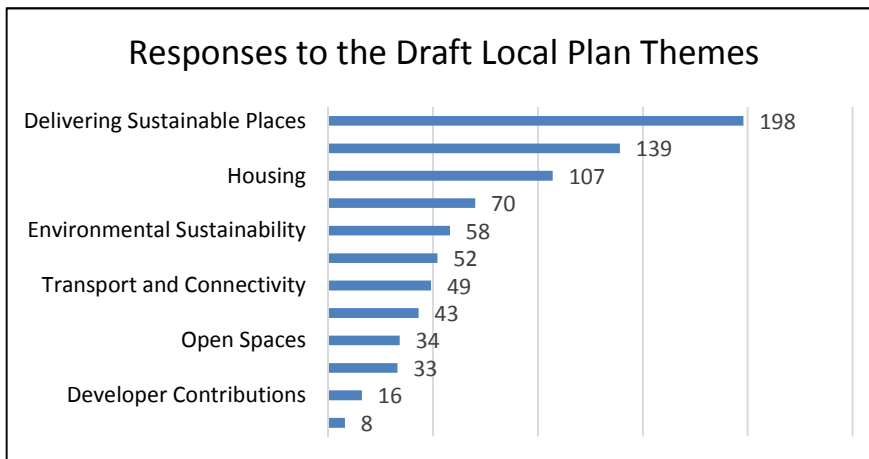
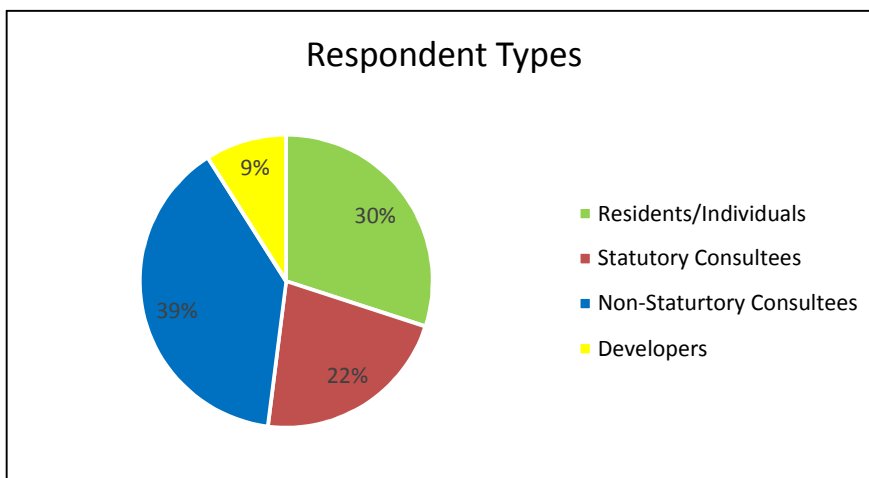
<b>Comments on Tower Hamlets New Local Plan: Infrastructure, Delivery &amp; Monitoring.</b>	
<b>Summary of the comments</b>	<b>LBTH's response</b>
<ul style="list-style-type: none"> <li>• Support population growth with required infrastructure and ensure its timely delivery in appropriate locations.</li> <li>• Extend City Fringe/Tech City to Whitechapel.</li> <li>• Need to secure the delivery of infrastructure not just funds towards.</li> <li>• Need to supply clean water, water pressure, sewage, electricity and broadband.</li> <li>• Support population growth with social and transport infrastructure, not just housing.</li> <li>• Need to better understand the capacity of the Borough and particular the Isle of Dogs to continue to support growth given</li> </ul>	<ul style="list-style-type: none"> <li>• Identify the boroughs key growth areas and ensure that development is planned for in a sustainable manner.</li> <li>• Consider the suitability of the submitted sites, review the existing site allocations and identify other potential sites for allocation in the new Local Plan.</li> <li>• Continue to undertake regular monitoring and adopt the following delivery approaches: <ul style="list-style-type: none"> <li>(1) Make use of planning obligations and the Community Infrastructure Levy (CIL)</li> <li>(2) Work with our partners to deliver our plans and proposals</li> </ul> </li> </ul>

<p>existing constraints.</p> <ul style="list-style-type: none"> <li>• Improve our transport infrastructure.</li> <li>• A total of 54 sites were submitted for potential site allocations from interested parties.</li> </ul>	<p>(3) Ensure necessary infrastructure is provided (4) Monitor the delivery of the Local Plan.</p>
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## 5. Stage 2 (Regulation 18): Consultation Responses Summary

### 5.0 Overview

5.0.1 The stage 2 (Regulation 18) consultation round resulted in 103 written responses from individuals or organisations. These responses generated 908 individual comments on the content of the Tower Hamlets Draft Local Plan 2031: Managing growth and sharing the benefits. The below graphs illustrate the types of respondents and response topics.



### 5.1 Summary of Representation Responses

5.1.1 The draft plan takes into consideration the responses received in the first round of consultation and engagement. Respondents in this round of consultation were generally supportive of the vision for the plan. Key issues raised included a concern over the broadness of the sustainable development criteria, its clarity and delivery and the proposed housing target split and trajectory. In particular, developers raised concern that the proposed off-site affordable housing requirement was too onerous and similarly commented that the open space and affordable employment policies were too onerous

and would affect development viability. Respondents were generally supportive of the sustainable travel and environmental sustainability policies, however sought greater clarification on the zero carbon policy.

5.1.2 A summary of the main issues raised by respondents in this round of public consultation held from Friday 11<sup>th</sup> November 2016 to Tuesday 2<sup>nd</sup> January 2017 and LBTH response to these is provided below.

<b>Policy 4.2: Sustainable Growth</b>			
<b>Number of responses: 43</b>			
<b>Main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>LBTH Response/Action</b>
Infrastructure contributions requirements need clarifying.	SG1.2.	Developer / landowner.	The infrastructure contributions requirements have been removed from policy S.SG2, as they are covered in the developer contributions policy D.SG5.
Planning and construction of new development – the council needs to consider the scale of development that this policy applies to. It is considered that requirements to assess cumulative impacts are too onerous.	SG2.	Developer / landowner.	Policy S.SG3 has been clarified to provide further detail on the scale of development policies are applied to.
Promote 'liveability' (i.e. quality of life for existing and future resident and workers. Avoid over development without sufficient infrastructure of all kinds to support it).	SG1.	Neighbourhood forums.	Policy S.SG2 seeks to ensure development contributes towards liveability through emphasising good design and limiting negative impacts.
Health impact assessment requirements are too onerous, should only be required for those developments which are considered to have a 'significant implications for people's health and wellbeing'.	SG1.7.	Developer/ landowner.	Policy D.SG3 has been altered so that different scales of development have to complete different types of health impact assessments, reducing the burden on smaller developments.
Sustainable development criteria are too broad and unclear how or whether they can be delivered.	SG1.1.	Developer/ landowner.	Policy S.SG2 has been altered to include tighter and clearer criteria.
Agree with proposal for developers to be required to consider the impact of construction of water supply, flood risk and drainage. May wish to reference the Greater London Authority's (GLA) guidance in "The Control of Dust and Emissions During Construction and Demolition".	SG2.	Statutory consultee (Environment Agency).	Policy supported noted and the Greater London Authority's Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance has been referenced.

**Policy 4.3: Design and Historic Environment**



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Number of responses: 139			
Main Issue	Relevant Policy	Respondent	LBTH Response/Action
Correct the name of the act in the explanatory text, reference is made to the "Conservation Areas and Listed Building Act" but this should be: Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act').	DH3.	Developer / Landowner.	For clarity, the reference to the conservation and listed buildings act has been deleted from the policy, as it did not add any merit to the overall policy.
Ensure the policy is compliant with the wording within the National Planning Policy Framework – specifically having clear distinction between designated and non-designated heritage assets.	DH3.	Developer / Landowner	The policy has been extensively reworded so that it is more compliant with the NPPF wording and other heritage guidance, such as using the terms 'preserve or where appropriate enhance' to safeguard heritage assets. The policy clearly identifies designated heritage assets (listed buildings, conservation areas etc.) and non-designated assets and sets out criteria for safeguarding these amenities.  We have liaised closely with Historic England in finalising the policy.
Separate 'strategic and locally designated views' from the heritage policy – views are not considered heritage assets.	DH3.	Developer/ landowners & statutory consultee (Historic England).	A separate policy on views has been included within the emerging Local Plan to ensure development positively contributes to strategically and locally important views in and around the borough (See policy D.DH4: Shaping and Managing Views).
Define the tall building zones.	DH5 & D.DH6.	Developer/ landowners & statutory consultee (Historic England).	Following the regulation 18 consultation, LBTH commissioned the preparation of the Tower Hamlets Tall Buildings Study (September 2017) to identify suitable locations for the development of tall buildings and to identify locations where the development of tall buildings may be less desirable.  The submission stage tall buildings policy has been informed by the recommendations of the above study and sets out five tall building zones at: <ul style="list-style-type: none"> <li>• Aldgate</li> <li>• Canary Wharf</li> <li>• Millwall Inner dock</li> <li>• Blackwall</li> <li>• Leamouth</li> </ul>
The approach to tall buildings should be supported by a robust evidence base.	DH 5 & D.DH6.	Developer/ landowners & statutory consultee (Historic England).	As above mentioned, the revised policy on tall buildings has been informed by the Tower Hamlets Tall Buildings Study, which forms part of the Local Plan evidence base.
Permitting tall buildings	PDH 5 &	Developer/	Although the revised tall buildings

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within tall building zones only is too restrictive.	D.DH6.	landowners & statutory consultee (Historic England).	<p>policy directs the development of tall buildings to tall building zones, the policy allows proposals outside of the zones to be considered where they can meet certain criteria such as contributing to open space.</p> <p>The Tall Buildings Study sets out areas outside of tall building zones that may be considered suitable for tall building proposals (such as sites in Wapping and Whitechapel).</p> <p>The study can be used as a guide by developers who are proposing tall buildings development.</p>
Tall buildings should be located within town centre, opportunity areas, Central Activities Zone and other areas of growth.	DH 5 & D.DH6.	Developer/ Landowners.	This has been considered and incorporated within the tall buildings study, which undertook a character analysis of the 24 places in the borough (as set out in the Local Plan) to identify suitable tall building zones.
The policy notes that where density exceeds the GLA recommendation the proposed development is required to exceed the minimum design standards of the Local Plan and London Plan. The design standards set out the minimum requirements for development and density should not be applied to an assessment of development proposals.	DH 6 & D.DH7.	Developer/ landowners & statutory consultees (Historic England).	The density policy has been amended so that any development exceeding the GLA recommendations should avoid over-development or identify suitable mitigation measures in relation to excessive demand on infrastructure and services and design - such as impacts on local amenity and character.

Policy 4.4: Housing			
Number of responses: 139			
Main Issue	Relevant Policy	Respondent	LBTH Response/Action
Clarify the London Plan target is a minimum. More detail required on the housing target split and trajectory in each sub-area. Recognition of the Isle of Dogs and South Poplar Opportunity Area Planning Framework on the housing target should be provided.	H1.	Developer/ landowners	Policy S.H1 clarifies the council's position in relation to the housing target; this is supported by a detailed breakdown of anticipated delivery in each sub area and place. LBTH has drafted a Housing Delivery Strategy which indicates its approach to sustainable housing delivery, including in relation to the Isle of Dogs and South Poplar Opportunity Area Planning Framework.
Prioritising new homes for British citizens is not a planning concern.	H1.	Developer/ landowners	Policy S.H1 has been reworded so that it focuses on encouraging development to sign up for the Mayor of London's Concordat.
Further clarity or reference to build to rent should be	General comment	Developer/ landowners	The supporting text to policy S.H1 outlines the council's position in

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included.	on housing policies.		regards to build to rent schemes and other emerging innovative housing products. As the Strategic Market Assessment makes clear, the council's main housing need is for affordable housing, so ensuring the delivery of affordable housing is the key objective for all housing delivery.
50% affordable housing requirement when allowed off-site is too onerous.	H2.	Developer/landowners	This is the current policy position and was found sound at previous examination. The interim viability testing suggests it is a viable policy. If the next viability assessment suggests this is not a viable policy, the policy may be reconsidered.
Incremental development policy isn't sound.	H2.	Developer/landowners	Policy D.H2(part 2d) has been reworded to clarify.
Missing market unit mix requirement.	H2.	Developer/landowners	This was an omission which has been corrected. The whole table has been updated following the SHMA refresh. The updated table is in policy S.H2.
Ensure the existing community are better involved in planning for new homes, particular estate regeneration.	H1.	Residents & community groups	Policy D.H2 includes a requirement for major developments and estate regeneration schemes to undertake thorough and inclusive public consultations proportionate to the nature and scale of development and submit a consultation statement detailing these activities.
Housing Quality Mark cannot be mandated.	H3.	Developer/landowners	The supporting text to policy D.H3 strongly urges developers to achieve high standards in line with the Home Quality Mark.
Housing Quality Mark should be obligatory.	H3.	Residents	In order for the plan to be in conformity with national policy, the Home Quality Mark cannot be obligatory. However the plan strongly encourages its use.
Plan needs to acknowledge that other policy requirements and designations may conflict with current policy wording requiring developments not to undermine the supply of conventional housing.	H1.	Developer/landowners	This has been acknowledged the supporting text under policy S.H1.

**Policy 4.5: Economy and Jobs**

**Number of responses: 70**

Main Issue	Relevant Policy	Respondent	LBTH Response/Action
Affordable employment attracted a number of comments. There was conflict between respondents, with a number (predominantly individuals/residents but also	EMP 1/EMP 6.	Developer/landowners	The bespoke affordable employment policy has been deleted. Policy S.EMP1 now promotes and encourages affordable employment provision along with co-working and grow-on space which have been identified as being in need. Policy EMP.2 now seeks

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the GLA and some landowners/developers) supporting the policy objectives or wanting the council to go further. On the other hand, there was much critique or objection to the policy from developers and landowners. In particular it was cited that affordability is not necessarily linked to cost but to flexibility. There was also criticism as to a lack of evidence, and that such provision wouldn't be viable.			10% of new employment space within major developments to be provided as affordable workspace. Evidence in support of the approach to affordable employment has been further developed.
A number of landowners/developers called for the de-designation of Local Industrial Locations, and greater support for housing and other uses within such areas. There was also support for the council's approach to protecting such areas, and seeking to designate new areas.	EMP 1.	Developer/landowners	LBTH considers that its evidence on the need to safeguard remaining industrial land is strong, and as such the approach proposed during regulation 18 is being carried forward.
There was much comment on the evidence requirements being requested where loss of employment space is proposed as being too long/onerous. It was suggested it should be shortened. It was also suggested the Local Plan should be more permissive of alternative uses including residential where employment land is genuinely redundant.	EMP 4.	Developers/landowners	LBTH considers its proposed approach to be reasonable and justified by its evidence, particularly given the borough's high employment projections. As such no change has been made to policy, and it is considered that policy is already supportive of alternative uses where those tests have been addressed.
A review of the designated preferred office locations was suggested, including better identification of the core areas.	EMP 1.	Developer/landowners & statutory consultees (City of London)	LBTH has reviewed the proposed preferred office location boundaries, and modified its approach and boundaries backed by new bespoke evidence.

<b>Policy 4.6: Town Centres.</b>			
<b>Number of responses: 52</b>			
<b>Main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>LBTH Response/Action</b>
A number of respondents commented on town centre boundaries. This was a mixture of suggestions for boundary additions or requests for boundary deletions/removals, plus a	TC 1.	Developers / landowners & residents	The town centre boundaries and frontages as consulted on during regulation 18 have been reviewed, and where necessary amended. With specific reference to Canary Wharf and potential future re-designation to a metropolitan centre through the

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number of comments in support of or objecting to town centre designations and frontages more generally.			London Plan, the plan has made it clear that such re-designation would be supported.
There was objection to the restriction on hot food takeaways within 200 metres of schools, in particular whether such a restriction could be evidenced.	TC.6.	Developers / landowners	The approach was reviewed and it was considered to be justified, based upon advice received and similar approaches elsewhere being found sound at examination. It is considered that the council has sufficient evidence for the approach.
Betting shop operators objected to the restriction on new betting shops within Primary Frontages, suggesting as town centre uses there is no basis for such an exclusion.	TC.2/TC.6.	Betting shop operators	LBTH is seeking to maintain its approach - to maintain the attractiveness and vibrancy of the primary frontages.

**Policy 4.7: Community, Cultural and Social Facilities**

Number of responses: 33

Main Issue	Relevant Policy	Respondent	LBTH Response/Action
Suggestion that some community facilities such as health centres aren't necessarily town centre uses, and as such should be greater flexibility as to where they should be located.	CSF1/CSF 5	Developers / landowners	Greater flexibility has been introduced into policy to facilitate such uses, and community facilities more generally, outside of town centre locations where there is demonstration of need and appropriate accessibility.
In addition to comments during the initial engagement consultation, further support was received in relation to the need to protect pubs and of the council's policy approach. No objections were received.	CSF.9.	Residents	The importance of this policy to local people has been recognised; evidence has been produced to further support the council's approach.

**Policy 4.8: Open Space**

Number of responses: 34

Main Issue	Relevant Policy	Respondent	LBTH's Response/Action
Support the provision of infrastructure and structures that support appropriate on-water uses.	S.OWS2 & D.OWS4	Community groups	Policies D.OWS2 and D.OWS4 have been amended to reflect that suitable infrastructure that supports water dependant and water related uses will be supported at appropriate locations in line with policy 7.27 of the London Plan. In addition, the definitions of the terms "open space" and "water space" have been amended to reflect the different challenges that the two face and the specific policy approaches required to manage these in a sustainable manner and in line with regional and national policies.
The Green Grid Strategy update should be published on the Local Plan consultation	D.OWS3	Community groups	The Green Grid Strategy Update has now been finalised and will be published together with other key

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website as a key evidence base document.			evidence base studies on the council's website during the regulation 19 consultation.
The requirement for developments to deliver open space on site will affect development viability.	D.OWS3	Developers / landowners	A viability assessment has been conducted to ensure that the Local Plan policies are not putting too much burden on developers. The policy has now been amended to promote open space delivery on site, particularly for strategic development.

<b>Policy: Environmental Sustainability (minus waste policies ES8 &amp; ES9)</b>			
<b>Number of responses: 58</b>			
<b>Main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>LBTH Response/Action</b>
Further consideration needs to be given to the scale and type of development the air quality policy applies to.	ES2.	Developers / landowners	It is considered that the scale and type of development the policy applies to is proportionate with the policy objectives, the borough's local context of poor air quality and the health evidence regarding vulnerable uses. The policy approach has been maintained in policy D.ES2.
Flood risk - concern that it wasn't adequately worded to reduce flood risk.	ES4.	Statutory consultee	Policy D.ES4 has been strengthened, with guidance from the Environment Agency.
Need to clarify how the zero carbon policy will respond to new building regulations.	ES6.	Developers / landowners	Policy D.ES7 has been updated to provide guidance on how the policy will be implemented following any change to building regulations.
Zero carbon policy requirements for a 60% CO2 reduction with 45% to be achieved on site is too onerous and will not be deliverable on some sites	ES6.	Developers/ landowners	It is considered that the approach outlined in policy D.ES7 is deliverable. This has been tested in the Carbon Policy Evidence Base (2016).
Need to be more ambitious with supporting environmental improvements including only allowing electric delivery vehicles, more electric charging points, solar panels on buildings etc.	ES1.	Neighbourhood forum	Both the transport and environmental sustainability policies require ambitious environmental improvements, where they are evidence based and deliverable. This has resulted in more restrictive parking standards and requiring onsite servicing. Policy D.ES7 requires interventions which reduce carbon emissions to be included on all major developments, including making onsite reductions. Where viable, this may result in use of photovoltaic cells (solar panels) on roofs.
Community gardens are very important for neighbourhoods community cohesion, air quality and physical and mental health.	ES3.	Neighbourhood forum	The supporting text to policy OWS1 highlights support for the delivery of community gardens.
Support policy and focus on environmental sustainability, in particular the commitments around air quality	ES1.	Community group	Policy support is noted.

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improvements and carbon reduction.			
Air quality policy requirements shouldn't apply to infrastructure projects and specific legislation and guidance for infrastructure projects should be referenced.	ES2.	Statutory consultee (Transport for London)	Policy D.ES2 has been altered accordingly and references the specific guidance for infrastructure projects.
Land contamination also needs to ensure developments consider groundwater protection and source protection zones	ES7.	Statutory consultee (Environment Agency)	Policy D.ES8 has been amended to include references to source protection zones.

<b>Policy: Environmental Sustainability - Managing Waste (Policies ES8 &amp; ES9)</b>			
Number of responses: 58 (part of environmental sustainability)			
<b>Main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>LBTH Response/Action</b>
Support the intensions of the strategic policy in terms of protecting and enhancing the environment.  Support the plan following the waste management hierarchy.	ES1.	Statutory consultee (Greater London Authority)	Continue to include the waste management hierarchy in the Local Plan.
Tables need clarifying and possibly merging	ES8.	Statutory consultee (Environment Agency)	The approach to waste sites has now been amended and we will continue to have three tables in order to differentiate the existing safeguarded sites as well as areas of search within the borough and areas of search within the London Legacy Development Corporation (LLDC).  Both the GLA and the LLDC have seen the proposed tables and have not raised any objections regarding this approach.
The overall approach to identifying safeguarded sites and a schedule of sites where a waste use, is broadly acceptable in terms of the London Plan.	ES7.	Statutory consultee (Greater London Authority)	The approach to safeguarding and identifying sites has changed and now involves safeguarding sites that were previously proposed to be released and also identifying areas of search rather than specific sites to meet our apportionment target.
Policy ES8 should be amended to show what progress Tower Hamlets is making in terms of recycling.	ES8.	Statutory consultee (Greater London Authority)	Policy S.MW1 'Managing our Waste' addresses recycling construction, demolition and excavation waste and policy D.MW3 'Waste collection facilities in new development' addresses recycling household and commercial waste
The plan only plans for apportioned waste and the tonnages are not clear and it is not clear how the borough	ES8.	Statutory consultee (North London Waste Plan)	The plan now takes into account all waste streams in either the policy and/or the supporting text.

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intends on meeting the capacity gap.			<p>Policy S.MW1 addressed apportioned waste and construction demolition and excavation waste. The supporting text refers to our evidence which confirms that hazardous waste, waste water and agricultural waste are produced in small quantities and therefore we do not have to plan for new facilities and/or they are managed at specialist facilities.</p> <p>The supporting text also includes details of the capacity gaps for apportioned waste and the land required to meet that gap, as well as the land that we have identified that could potentially accommodate waste facilities to address the capacity gaps.</p>
Not all waste streams have been planned for	ES8.	Statutory consultee (Greater London Authority)	Procured additional evidence to consider outstanding waste streams and addressed them in the supporting text of the policy.
Maps and grid references should be provided for the sites as they are not identifiable	ES8.	Statutory consultee (Environment Agency)	The maps of the each waste site are shown on the policies map.
Details of Environment Agency permitted thresholds on the waste sites provided	ES8.	Statutory consultee (Environment Agency)	No action necessary.
Tower Hamlets should continue to work with the LLDC to seek to meet their apportionment within the area. Also work with the GLA and London Waste Planning Forum members to identify suitable sites elsewhere in London to meet any shortfall. Consideration should be given to planning for construction, demolition and excavation waste which is generated in the borough.	General	Statutory consultee (London Legacy Development Corporation)	<p>We have worked closely with the LLDC and continue to do so on matters regarding waste. Various meetings, telephone discussions and email correspondence have taken place to ensure that we can identify sufficient land to meet our apportionment target.</p> <p>With regards to construction, demolition and excavation waste, this has been addressed on policy S.MW1 which expects new developments to reuse and recycling construction, demolition and excavation materials on site or close to where it arises.</p>
Development that supports waste management should not include incineration or any waste management that has an impact on air quality	ES8.	Community group	Policy D.MW2 ensures that air quality impacts are adequately mitigated.
Note: the capacity land identified to meet the capacity gap, including safeguarding sites.  Support the removal of Ailsa	ES8.	Developers / landowners	The evidence has been updated and has been concluded that Ailsa Street needs to be safeguarded in order to demonstrate that we can meet our apportionment target.



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Street as a waste site as it is in the South Poplar Housing Zone due to conflict with housing. The de-designation of the site will help deliver housing.			Ailsa Street is now going to continue to be safeguarded under policy S.MW1.
Support the release of Ailsa Street but do not understand the introduction of Empson Street for waste uses	ES8.	Developers / landowners.	Ailsa Street is now being safeguarded for reasons detailed above.  Empson Street has been identified as an area of search due to its GLA Strategic Industrial Location designation, which, in principle supports waste uses.
The policy does not justify the release of waste sites or identify replacement capacity	ES8.	Statutory consultee (North London Waste Plan)	The loss of waste sites and replacement capacity is addressed under policy S.MW1.  The Waste Management Evidence Base Review (2017) also explains the rationale regarding the loss of waste sites.
An old version of the waste hierarchy has been shown	ES8.	Statutory consultee (North London Waste Plan)	The waste hierarchy has been updated.
Wording missing at the end of part 3	ES8.	Statutory consultee (Greater London Authority)	Wording of policies reviewed and amended.
The policy effectively sets out how the council will support development that manages its waste effectively. Transport for London will work strategically with the council to support this policy.	ES8.	Statutory consultee (Transport for London)	No amendments necessary as the policy is supported
Methods for calculating waste capacity is flawed.	ES8.	Statutory consultee (Environment Agency)	A review of the evidence base was undertaken and the assumptions have been revised accordingly both in the policy and evidence base.
Waste facilities should be enclosed	ES9.	Statutory consultee (Environment Agency)	Policy D.MW2 requires waste facilities to be enclosed.
Find ways to avoid rubbish being dumped for collection in the streets. Need designated areas for storage. It's creating noise and pollution	ES9.	Neighbourhood planning workshop.	Policy D.MW3 ensures that all developments include adequate provisions for the storage of refuse and recycling. In addition, major developments are required to include mass waste collection systems.

Policy: Transport and Connectivity			
Number of responses: 49			
Main Issue	Relevant Policy	Respondent	LBTH Response/Action
Sustainable travel is essential	TR1	Residents &	Review and refinement of policy S.TR1

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- development must prioritise the needs of pedestrians, cyclists and access to public transport, including river services.		statutory consultees (Transport for London)	to ensure priority to sustainable travel modes and the promotion of active travel to and from the site.
Concerns over private car ownership and congestion issues, with general support for 'car free' development.	TR1 & TR3	Residents, statutory consultees (Transport for London) & developers/landowners	Review and refinement of policies S.TR1 and D.TR3 in order to effectively prioritise sustainable travel and facilitate modal shift.
Need for significant infrastructure improvements, including river crossings, capacity enhancement and the need to address severance issues.	TR1	Statutory consultees (Transport for London) developers \ landowners & community groups	Review and refinement of policy S.TR1 to ensure that it fully reflects local and strategic infrastructure requirements set out in the Infrastructure Delivery Plan and TfL's business plan. Also further policy alignment to the Mayor of London's strategic objectives, such as the Mayor of London's emerging Transport Strategy and healthy streets approach.
Clarity on development contributions towards transport infrastructure, particularly towards wider walking and cycling networks to promote active travel.	TR1, TR2, TR3, TR4 & DC1	Developers \ landowners & residents	More clarity provided on developer contributions throughout the transport chapter, cross-referencing to developer contributions policy (see policy D.SG4).
Further reference to policy objectives regarding safeguarded wharves.	TR4	Statutory consultee (Ports of London Authority)	Amendment to policy D.TR4 to reflect comments.
There is a need to take account of service traffic generated by new homes and retail	TR4	Residents & community groups	Amendment to policy D.TR4 to reflect comments.

<b>Policy: Monitoring and Delivery</b>			
<b>Number of responses: 16</b>			
<b>Main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>LBTH Response/Action</b>
Need to ensure that developer contributions and land for infrastructure is sufficient to accommodate increase in demand through growth.	DC1	Businesses & developers \ landowners	Comments noted and considered in the development of policy D.SG4 (developer contributions). Further details of contributions set out in the Planning Obligations Supplementary Planning Document.
Further clarify needed in council's approach to dealing with vacant building credit.	DC1	Businesses & developers \ landowners	Policy D.SG4 updated to include clear explanation of why it considers the credit should not apply to development across the borough area.
Further clarity required around the relationship between community infrastructure levy contributions and section 106 so as to ensure that	DC1	Businesses & developers \ landowners	Policy D.SG4 amended to provide further clarity on relationship between community infrastructure levy and section 106 contributions.

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development viability is not threatened.			
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Chapter 5: Delivering Sustainable Places.			
Number of responses: 198			
Main Issue	Relevant Policy	Respondent	LBTH Response/Action
Supportive of opportunity areas to facilitate growth. This should be expanded to include more details.	Chapter 5	Housing association	Each of the sub-areas has detailed principles, many of which facilitate growth, and the site allocations also include details of land use requirements and infrastructure to support growth
The images no longer truly representative of the '24 places'	Chapter 5	Neighbourhood planning workshop	All images in the Local Plan have been updated to reflect appropriate changes
Better development area proposals / management structures required such as urban development corporations like Park Royal)	City Fringe	Neighbourhood planning workshop	The council cannot designate or create a development corporation, however in order to address the specific requirements and characteristics of the borough, four sub-areas have been created that have development principles that should be incorporated into developments.
Maps shown incorrectly	Figure 5.3	Various	Map corrected
Significant concern that the sequential test for the site allocations has not been undertaken	Chapter 5	Statutory consultee (Environment Agency)	Sequential and exceptions tests have been undertaken
Use the term 'flood zones' rather than 'flood risks'	Chapter 5	Statutory consultee (Environment Agency)	The term flood zone has been incorporated into the site allocations
Biodiversity protection and betterment need to be incorporated into the design principles and site allocations	Chapter 5	Statutory consultee (Environment Agency)	The design principles and the site allocations refer to protecting and improving biodiversity.
Information regarding estuary edges and setbacks provided	Chapter 5	Statutory consultee (The Environment Agency)	The Environment Agency will be consulted on appropriate developments and the Strategic Flood Risk Assessment also addresses setbacks.
Support the provision of potential schools to meet identified need. Recommends the provision of a school site within the relevant site allocation unless it can be demonstrated that the need for school places and/or a school site generated by the development has been secured through alternative means.	Chapter 5	Statutory consultee (Department for education and skills)	<p>Various discussions have taken place with our education and employment teams to better understand the population and school role projections. A number of the sites have also been viability tested. Further refinement has also been undertaken on the sites in terms of their deliverability, amongst other things.</p> <p>The above information has enabled relevant sites to be allocated for a primary or secondary school.</p> <p>The Infrastructure Delivery Plan</p>

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			<p>identifies that 3-4 primary schools are required and we have allocated 9.</p> <p>4 secondary schools are required and we have allocated 5.</p>
Viability testing report not available	Chapter 5	Developers \ landowners	Viability testing report available on the website and it has now been updated.
Information regarding the scale and phasing should be provided to assess the impact on the water and treatment network.	Chapter 5	Statutory consultee (Thames Water)	Details of the infrastructure and land use requirements have been provided but phasing and scale of development will be determined at the application stage, and Thames Water will be consulted.
<p>Emphasise the role and importance of heritage assets and the delivery of conservation led regeneration.</p> <p>Include spatial layers for key heritage designations on the site allocations maps.</p>	Chapter 5	Statutory consultee (Historic England)	<p>Conservation and Heritage assets have been addressed both in the sub-area principles as well as the design principles for the site allocations where appropriate.</p> <p>The importance of heritage and conservation is also addressed within the design and heritage policies.</p> <p>Heritage assets have not been shown on the site allocations map but can be viewed on the policies map.</p>
The Site Allocations Methodology Note requires clarification with regards to capacity	Chapter 5	Statutory consultee (Historic England)	The site allocations methodology note has been updated and includes details on how the capacity on sites has been calculated.
The Conservation Strategy is good but it does not appear to have informed the document	Chapter 5	Statutory consultee (Historic England)	Conservation, heritage and design matters have been included in the design principles and the site allocations.
Implications for the areas marked 'opportunities for regeneration', particularly housing estates.	Chapter 5	Various	
Requests to include/remove sites from site allocations	Chapter 5	Various	Boundaries amended as appropriate.
Additional requirements for schools that fall outside of the site allocations	Chapter 5	Statutory consultee (Department for Education & Skills)	The site allocations have addressed the needs arising from additional school places in the borough in accordance with the recommendations of the Infrastructure Delivery Plan.
Protection of heritage assets and conservation areas, and include reference to them in the site allocations and sub-areas	Chapter 5	Various	<p>Reference has been made to the heritage and conservation aspects of site, both in the development principles for each sub-area as well as the site allocation.</p> <p>The approach to the protection of such assets is also reinforced in the design and heritage policies.</p>
Canary Wharf should not be considered separate to Millwall and Cubitt Town	Chapter 5.	Residents	No change required: Millwall, Cubitt and Canary Wharf fall with the Isle of Dogs sub area which considers the whole area in its entirety, to ensure

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			strategic links and movements are seamless to support access to opportunities across the area.
Failure to identify sports facilities required to support growth.	Chapter 5	Statutory consultee (Sport England)	The site allocations reflect the requirements identified with the Infrastructure Delivery Plan.  Where existing leisure facilities exist they will be re-provided. This is also supported by the community facilities policies.
Welcome the recognition of Isle of Dogs and South Poplar as its own sub-area	Chapter 5	Developers \ landowners	No amendments required
Clarification of definitions (e.g. activity areas)	Chapter 5	Statutory consultee (Transport for London).	Throughout the document definitions have been provided in the main body of the text or in the glossary.
Should be eco-friendly	City Fringe Sub-area	Neighbourhood Planning Workshop	Environmental impacts have been addressed in the development principles for each sub-area
The characteristics of Spitalfields should be recognised	City Fringe Sub-area	Not stated	The development principles for each sub-area have been outlined and the importance of the characteristics of each place is also addressed in the design policies, particularly policy S.DH1.
There must be a balance between housing and commercial growth in Aldgate	City Fringe	Statutory consultee (City of London)	Housing and economic growth are addressed in the development principles and do not focus on Aldgate.  Policy S.EMP1 ensures that employment uses are protected.
Provide small floorplates for new businesses /shops /start-ups and boutiques	City Fringe	Neighbourhood planning workshop	Small-to-medium enterprises are one of the requirements within the development principles for the sub-area.  The employment policies in the 'delivering economic growth' chapter also support start-ups.
Improve connectivity between various places within the borough	Chapter 5	Various	Connectivity has been addressed within the development principles for each sub-area as well as in the site allocations.  There is also a chapter within the plan - improving connectivity and travel choice - which also seeks to ensure places are well linked.
Support the recognition of 1,900 new homes in the City Fringe, however clarity is required on how the council will seek to deliver the proposed 10,600 new homes within the opportunity area.	Chapter 5	Various	Details of how the homes will be delivered are explained within the Housing Delivery Strategy (2017).

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City Fringe principles supported, and there is an opportunity to rebalance the mix of uses, providing an increased focus on employment uses. Policies should enable the continued regeneration of the area	City Fringe	Developers \ landowners	The development principles along with the employment policies support the role of employment uses within the area, including creating a sustainable mix of uses.
Support the inclusion of Oban Street for a mixed use development	Chapter 5	Statutory consultee (Transport for London)	Oban Street was removed from the site allocations during the stages following the regulation 18 consultation. Details of the rationale for removing the site can be found in the Site Allocations Methodology (2017).
Reference to the medical research cluster should be strengthened.	Chapter 5	Queen Mary, University of London	Med City is referred to in the development principles and life sciences are referred to in the Whitechapel South site allocation
Green Grid Strategy is referred to but is not published	Chapter 5	Developers\ landowners	The strategy is going to be published along with the other evidence base documents.
The implications on landowners in terms of viability and deliverability of site and community infrastructure levy contributions	Chapter 5	Various	Site allocations have been viability tested in accordance with the government's Planning Policy Guidance and community infrastructure levy contributions will be made in accordance with the relevant policies.  The deliverability of sites was also considered during the site allocation selection process as outlined in the Site Allocations Methodology (2017)
Lack for provisions for young people who work in the area, as well as tourists.  Whitechapel Market needs to be improved.  Old Royal London Hospital could be used as a civic centre and the area could have restaurants and coffee shops.	Chapter 5	Residents	The development principles for the City Fringe sub-area and the Whitechapel site allocation have been site out in the Plan.  The site allocation refers to the creation of a civic centre. The market is not included within the site allocation. The sub-area development principles do address how town centres can remain their vitality, including Whitechapel.
The Local Plan should promote higher density developments	Chapter 5	Developers \ landowners	Densities have been based on the density matrix as well as other site specific characteristics
Protect heritage assets and start-up business	Chapter 5	Residents	Heritage assets have been protected through the sub-area development principles, site allocations and the design and heritage policies.  Various employment types area addressed in the employment policies.
Support the inclusion of this site for allocation, but details	Bishopsgate Goods	Developers \ landowners	Details of the capacity are not provided for the site allocations.

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of densities should be provided.  There should be flexibility in terms of the capacity in order to meet the housing demand.	Yard		Developments will be considered on their merits at the planning application stage.
Should prioritise key worker housing, family housing for permanent London residents.  Maximise open space, provide flexible workspaces and cultural and various other proposed uses.	Bishopsgate Goods Yard	Residents	The land use and infrastructure requirements have been outlined in the site allocations and the vision for the sub-area is outlined in the development principles. Further details regarding what is on site will be assessed at the planning application stage.
Contaminated land should be considered.	Chapter 5	Statutory consultee (Environment Agency)	Contaminated land has been highlighted as a consideration within a number of site allocations, however where it has not, contaminated land matters will be addressed as the planning application stage.
No requirement to re-provide the existing health facility	Whitechapel South	Developers \ landowners	The health facility is required to be re-provided within the site allocation. The council's public health team considers that the service needs to remain in the borough.
Support the inclusion of the Whitechapel Estate within the Whitechapel South allocation, but it should include housing as a land use requirement to create a mix of uses and also be in line with the Whitechapel Masterplan.	Whitechapel South	Developers \ landowners	Housing has been included within the Whitechapel South site allocation.
Local Industrial Location designation will limit or preclude development	City Fringe	Developers \ landowners	Draft allocation of being a LIL is incorrect and has been removed
Activation and use of water spaces should be considered and encouraged	Chapter 5	Various	The use of water spaces has been addressed within the site allocations and is also addressed within the enhancing open spaces and water spaces chapter.
Identify and designate new areas of open space, in particular green spaces	Chapter 5	Neighbourhood planning workshop	Site allocations require some form of open space, whether it is small (0.4 hectares) or strategic (1 hectare).
Make better use of inefficient sites	Chapter 5	Neighbourhood planning workshop	The site allocations make use of sites, some of which are not currently operating efficiently, and outlines requirements for land uses and infrastructure requirements.
Low number of site allocations within the Central sub-area	Central sub-area	Not stated	The site selection process is outlined in the Site Allocations Methodology (2017)
Devons Road should be included as one of the centres where improvements could be focused	Central sub-area	Developers \ landowners	Reference has been made to Devons Road in the development principles for the sub-area in terms of enhancing the green grid network.
Link open space to cemetery	Bow Common	Not stated	The indicative map links the open space to the cemetery

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	Gas Works		
Retain the Gas holders	Bow Common Gas Works	Not stated	An application for their removal was issued under the prior approval process. The gas holders have now been removed.
Various comments about the design and use of the site	Docklands Delivery Office	Developers \ landowners	The site is no longer a site allocation and was removed from the list, as per the Site Allocations Methodology (2017)
Impact of development in the water space	Chapter 5	Various	The impact of development on the water space has been considered in the sub-area development principles and the site allocations as well as policies relating to water spaces.
Reference should be made to the regional park in the Lower lea Valley sub-area.	Lower Lea alley sub-area	Lee Valley Regional Park Authority	Reference has been made to the Lea river park in the introduction and in the development principles for the sub-area
Teviot Estate should be included as one of the key regeneration areas.  Limehouse cut should be included as a place where additional footbridges are sought.		Not stated	Key regeneration areas have not been identified.  Footbridges have been identified in areas that are considered appropriate.
Empson Street should be a site allocation for a mix of uses	Lower Lea alley sub-area	Developers \ landowners	Empson Street is a Strategic Industrial Location designated by the GLA and is not appropriate for housing.
A pedestrian bridge over the Lea should be essential rather than potential	Lower Lea alley sub-area	Developers \ landowners	We have identified aspirational locations for bridges but are not in a position to make them an essential requirement.
No.1 gasholder should be locally listed and should be protected	Leven Road Gas Works	Residents	In order to locally list the gasholder it would need to go to the formal process.  The site allocation design principles strongly encourage the retention of the gasholders.
The viability of the site given the land use requirements.  Reference to the footbridge cannot be a requirement	Leven Road Gas Works	Developers \ landowners	The site has been viability tested.  The footbridge is not required, but an area of land for the bridge needs to be retained/safeguarded.
Support the designation of Oban street as a site allocation	Oban street	Developers \ landowners	This site has now been removed from the site allocation. Further details are in the Site Allocations Methodology (2017).
Lack of details regarding how the area will feel and function, how utilities will be provided and waste disposed of. Infrastructure to support the population growth has not been fully considered.	Isle of Dogs and South Poplar	Residents	Details of the vision for the area and how it will function are provided within the sub area vision, development principles and site allocations.  The sub-area and site allocations also provide details of the infrastructure requirements based on the



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			Infrastructure delivery Plan (2017)
Docks should not be treated the same as open space	Isle of Dogs and South Poplar	Developers \ landowners	This has been addressed in the water space policies. Water space has a separate definition from open space in the plan which reflects the different challenges and approaches facing this valuable asset.
School to go on a site allocation such as Billingsgate or North Quay	Isle of Dogs and South Poplar	Not stated	Billingsgate now includes a school.
Homes should be affordable and for key workers as well as those on the council's waiting list (amongst others). Education and training should be provided for people.  Wildlife should be sustained and enhanced	Isle of Dogs and South Poplar	Resident	The proposed housing mix is set out in the chapter on meeting housing needs.  Education and training and access to employment are covered in the chapter on supporting community facilities.  Biodiversity and wildlife are addressed in the sub-area development principles, site allocations as well as the enhancing open spaces and water spaces policies.
South Poplar is being treated as an afterthought to the Isle of Dogs. It has a different heritage to the Isle of Dogs and is in danger of being forgotten and blocked off by nearby developments. Tall buildings should be limited to certain areas	Isle of Dogs and South Poplar	Not stated	The nature of South Poplar has been considered in the sub-area development principles and the site allocations.  Heritage and design have also been considered in chapter 3 (creating attractive and distractive places)  With regards to tall buildings, an evidence base has been provided and identifies areas that are appropriate for tall buildings – and it takes the surrounding areas into account.
The role of Cross harbour District Centre should be mentioned in the supporting text.	Isle of Dogs and South Poplar	Statutory consultee (Transport for London)	Crossharbour District Centre is emphasised in the development principles.
Figures in the Isle of Dogs and South Poplar should be consistent with the Isle for Dogs and South Poplar Opportunity Area Planning Framework	Isle of Dogs and South Poplar	Statutory consultee (Transport for London)	The Isle for Dogs and South Poplar Opportunity Area Planning Framework has not yet been published and we are working closely with the GLA to ensure that the framework is in conformity with statutory planning policies.
Suggestions for the vision of the Clove Crescent Site Allocations	Clove Crescent	Developers \ landowners	This site has been removed from the site allocations, as per the Site Allocations Methodology (2017)
Development should be stepped back from the water edge	Marsh Wall East	Developers \ landowners	The design principles in the site allocation emphasise the need to provide active frontages and access along the dockside which will require buildings to be stepped back.
Public Transport Accessibility Level (PTAL) rating incorrect	North Quay	Developers \ landowners	The site allocations have been updated and the sites have been viability tested

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Various comments regarding the uses on site			and the uses outlined in the site allocation are considered to be appropriate.
The proposed land use requirements should have regard to the existing operational needs of the site. Caution the council with any reliance on the open space, primary school and district heating facility which is unlikely to be suitable for neighbours.	Reuters	Developers \ landowners	The existing use and infrastructure requirements have been taken into account as detailed in the Site Allocations Methodology (2017).
Concern regarding the inclusion of the Tiller leisure centre due to the viability implications.  Requirement for a district heating facility is over prescriptive.	Westferry Printworks	Developers \ landowners	The leisure centre is required to be re-provided  The district heating facility is no longer a requirement.

## 6. Stage 3 (Regulation 19): Publication.

### 6.0 Introduction.

6.0.1 Following the two formal consultation rounds (stages 1 and 2) in accordance with Regulation 18 of the TCPA, a further formal consultation round was undertaken on the proposed submission document entitled 'Tower Hamlets Local Plan: Managing growth and sharing the benefits: regulation 19 consultation'. This takes into consideration the responses received in the first and second rounds of public consultation and engagement.

6.0.2 The consultation period on this stage of the local plan took place over six weeks from Monday 2<sup>nd</sup> October until 5pm on Monday 13<sup>th</sup> November 2017 as specified in the Statement of Representations Procedure.

### 6.1 Consultation Methods.

#### 6.1.1 Website:

6.1.1.1 Details of the proposed submission local plan and the regulation 19 consultation stage was detailed on the dedicated local plan webpage that was provided throughout all stages of consultation. This page provided a link to the plan, the full list of evidence base studies, supporting documents that sit alongside the plan, a link to the policies map and the previous versions of the plan consulted on during stages 1 and 2 of public consultation.

6.1.1.2 This webpage identifies where hard copies of the proposed submission Local Plan can be viewed and a link to the Statement of Representations Procedure and the Statement of Community Involvement.

This page can be viewed via the following link:

[http://www.towerhamlets.gov.uk/lgn/council\\_and\\_democracy/consultations/past\\_consultations/Local\\_Plan.aspx](http://www.towerhamlets.gov.uk/lgn/council_and_democracy/consultations/past_consultations/Local_Plan.aspx)

6.1.1.3 This webpage included a link to the council's consultation portal where the public could submit comments on the proposed submission Local Plan. This portal contained extensive information including an explanation of how the public could get involved, submit comments on the documents, all evidence supporting both consultation documents and the dates of all events and exhibitions.

The consultation portal can be viewed by accessing the below link:

<http://towerhamlets-consult.objective.co.uk/portal>

#### 6.1.2 Summary Booklet:

6.1.2.1 A booklet summarising the proposed submission Local Plan entitled 'Managing growth and sharing the benefits: Regulation 19 consultation, 2 October – 13 November 2017: Tower Hamlets Local Plan 2031'. This booklet was distributed throughout the borough's idea stores during the six week consultation period. The booklets were also made available at all consultation events and meetings.

#### 6.1.3 Libraries and Idea Stores:

6.1.3.1 During the consultation period, hard copies of each consultation document and supporting evidence were made available at the Town Hall (Mulberry Place), Cubitt Town Library, Bethnal Green Library, Local History and Archives Library and Idea Stores (which are located throughout the borough).

#### 6.1.4 Emails and Letters:

6.1.4.1 1,225 emails and letters were sent to local residents, business, community organisations, housing providers, neighbouring planning authorities, stakeholders and the wider community (This included anyone who responded to the previous consultation stages). The specific and general consultees are listed in Appendix 1 and 2 of this statement.

6.1.4.2 Additionally, everyone registers on the council's planning policy database, who expressed an interest in the progress of the Local Plan and other planning policy documents were notified. A freepost address was made available for receiving written comments and publicised consultation documents, e-mails, posters and leaflets.

#### 6.1.5 Press and Media Coverage:

6.1.5.1 Notices and articles were advertised in local newspapers and on websites outlining the consultation period, events and information on the consultation documents as detailed below:

Stage 3 (Regulation 19) 'London Borough of Tower Hamlets Proposed Submission Local Plan'	
Paper/Website/Organisation	Details & Duration
Docklands and East London	Public notice of the publication of the London Borough of Tower

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Advertiser	Hamlets Proposed Submission Local Plan detailing the duration of public consultation, where to view the plan and supporting documents, how to make representations and dates and times of public information events was placed on 28 September 2017.
Eventbite	The dates and locations of public workshops for this stage of consultation were advertised on this website and allowed people to sign up to attend.
Docklands and East London Advertiser	News article entitled 'Last Chance to have a say on Tower Hamlets Local Plan for schemes up to 2031' was published on 7 November 2017
Digital screen advertisements	Digital screens located in idea stores throughout the borough and the ground floor of the Council offices at Mulberry Place Town Hall, Poplar displayed information on the Regulation 19 public consultation stage and consultation events between October and November 2017.
www.environment-analyst.com	A news article entitled 'EIA – laden Tower Hamlets nears updated local plan' was featured on this website on 1 November 2017.

6.1.5.2 Twitter, facebook and instagram were used to promote consultation events throughout the consultation period. LBTH sent out 5 tweets at various times over the consultation period alerting the public that it was their last chance to have a say on the new local plan. This resulted in 10,055 impressions, 208 engagements and 20 retweets.

6.1.5.3 Details of the Tower Hamlets Local Plan: Managing growth and sharing the benefits: regulation 19 consultation document was featured in the Tower Hamlets newsletter on 6 October 2017. This was circulated to 9,207 residents, organisations and individuals.

### 6.1.6 Workshops and Meetings:

6.1.7 LBTH organised three public workshops with the purpose of providing information on the nature of the regulation 19 consultation stage, the meaning of the test of soundness and how representations could be submitted. An invite was distributed to all of the consultees on the planning consultation database, as well as the council's network of voluntary and community sectors organisations, organisations representing disabled people and equalities organisations.

6.1.8 LBTH appointed an independent RTPI-qualified facilitator to lead the workshop discussions in order to provide impartiality and expertise in obtaining participation and feedback from participants. The workshops were structured around presentations. The workshops began with a presentation from council officers outlining the role and purpose of the plan and the main changes to the document since the last consultation stage. The independent facilitator then presented on the role of the consultation stage and the process for commenting and this was followed by a question and answer session. The workshops also highlighted the importance of the evidence base which supports the Local Plan.

6.1.8.1 Below is a summary of the dates and locations where these workshops took place:

Stage 3 (Regulation 19): London Borough of Tower Hamlets Proposed Submission Local Plan			
Date	Time	Venue	Number of attendees
Wednesday 11 October 2017	6:30pm-8:30pm	Idea Store, Whitechapel	5
Monday 16 October 2017	6:30pm-8:30pm	Jack Dash House, Isle of Dogs.	32
Thursday 19 October 2017	2pm-4pm	Bethnal Green Library.	11

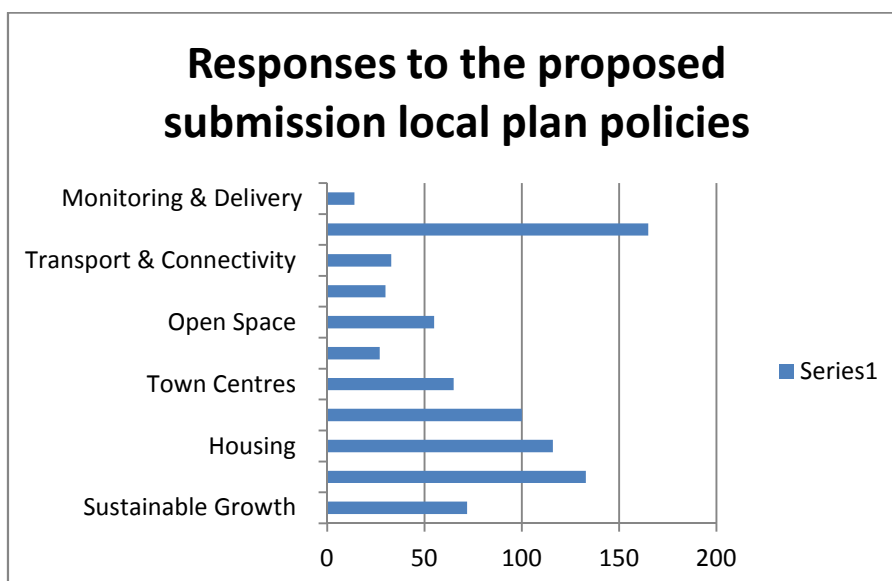
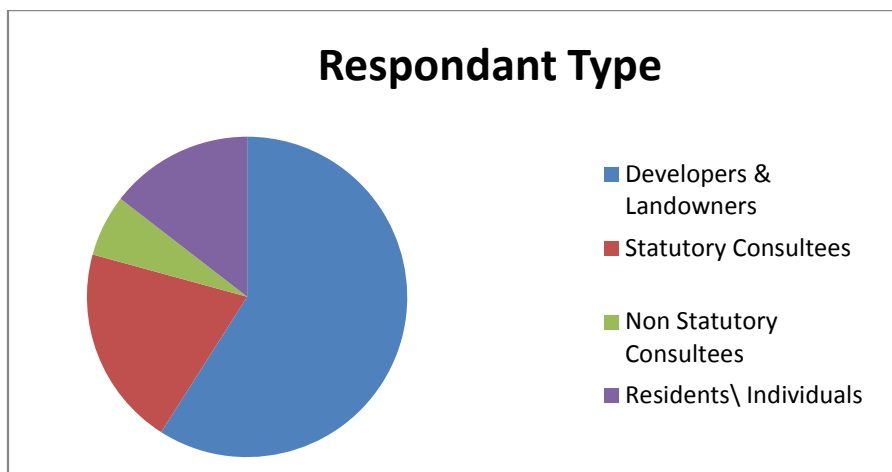
6.1.8.2 All of these venues were chosen on the basis of their availability and accessibility, being centrally located in the heart of the borough close to public transport routes.

6.1.8.3 There are no statutory requirements to undertake any specific engagement events for this submission stage (regulation 19) of the plan preparation process. As such, these workshops went beyond the council’s statutory requirements and fully complied with the standards set in the Statement of Community Involvement. All comments have been reviewed and have helped to shape the proposed submission version of the new local plan.

## 7. Stage 3 (Regulation 19): Consultation Responses Summary

### 7.0 Overview

7.0.1 In total, 126 individuals or organisations (including residents, local authorities, government bodies, businesses, community groups, landowners and developers) responded to the regulation 19 consultation on the Local Plan. Between them they made 948 individual comments. The below graphs illustrate the types of respondents and responses received by local plan policy.



## 7.1 Summary of Representation Responses

7.1.1 The proposed submission Local Plan takes into consideration the responses received in the first and second rounds of consultation and engagement. The key trends in responses received during this stage are summarised below:

- Largely, the overall approach to directing growth towards the opportunity areas and key transport interchanges within the Local Plan has enjoyed broad consensus among consultees.
- Consultees are generally supportive of the borough-wide vision and the overarching objectives and principles set out in section 2.
- Statutory bodies (including Greater London Authority, Environment Agency, Natural England, Heritage England, Highways Agency and Transport for London) are generally supportive of the Local Plan and have raised no objections on the grounds of soundness and legal compliance (apart from Sports England –see the tables below).
- The Greater London Authority has also confirmed that the Local Plan is in general conformity with the current adopted London Plan subject to a review within 10 years of adoption.
- 4 representations have been received from neighbouring authorities (Kensington & Chelsea, City of London, North London Waste Plan and Hackney) but none of the comments relate to soundness. All responses from neighbouring authorities have been positive and reflect the work that has been undertaken jointly on cross-boundary strategic priorities.
- The majority of responses received from counsellors, local resident groups and community organisations focused on the protection and enhancement of locally important heritage assets and estate regeneration. Regents Network, East End Waterway Group (including a petition of 3,912 signatures), Friends of Regent Canal and the Victorian Society are seeking greater protection to ensure the gasholders in Bethnal Green are retained in situ.
- In order to facilitate development and investment opportunities some developers and landowners are seeking to allocate new sites, extend existing sites and designations (i.e. town centre boundaries) or create new designations. Other respondees are seeking further clarification on the meaning of some of the definitions and terms within the glossary and supporting text. Respondees are also requesting that some of the policies be more flexible to take account of site constraints and market conditions (this is a reiteration of previous comments from regulation 18).
- The development industry has raised no objections regarding our approach to mass waste collection systems, although landowners are objecting to the safeguarding of areas of search and the policies. The principle of the tall building zones is also supported.

7.1.2 A summary of the main issues raised by respondents in the (Regulation 19) public consultation held from Monday 2 October until Monday 13 November 2017 and the council’s response to these is provided below. A limited number of minor modifications are proposed to the Local Plan and the Policies Map in response to representations. These modifications are highlighted in LBT’s response column of the tables below.

Chapter 2: Achieving Sustainable Growth.			
Number of responses: 72			
Summary of main Issue	Relevant Policy	Respondent	LBTH Response/Action
Growth is too concentrated in the Isle of Dogs and not sufficiently distributed to other areas, such as Whitechapel and central areas of the borough.	S.SG1.	Developer/ residents	<p>The Isle of Dogs is established as an opportunity area in the London Plan. Opportunity areas encourage high growth in areas that have good access to services, transport, employment and developable land.</p> <p>The assumed distribution of growth is based on the best available data in relation to planning permissions, site allocations and available land, having assessed delivery constraints. The locations of growth do not dictate where growth should go; it represents our understanding of where growth is coming forward in the borough.</p> <p>The growth areas in the plan are a result of extensive work undertaken with the GLA through the London Strategic Housing Land Availability Assessment.</p>
Health impact assessments (HIAs) should only be required where major development schemes are anticipated to have significant implications for people’s health and well-being (as per the London Plan).	D.SG3.	Developers \ landowners	<p>The Local Plan confirms that all major developments will be required to undertake a rapid HIA. This is consistent with the approach set out in the London Plan.</p> <p>Due to local circumstances (as evidenced in the Tower Hamlets Health and Wellbeing Strategy), the requirement also applies to certain types of developments (e.g. schools) and certain areas (e.g. poor air quality). We only require more detailed HIAs on developments of a scale referable to the GLA. We consider this to be proportionate. However, we recognise that the wording of the policy could be clarified and minor amendments to the wording have been undertaken to do this.</p>
The approach to vacant building credit is more restrictive than the Affordable Housing and Viability SPG (GLA) and is unjustified.	D.G5:	Developers \ landowners	<p>The Affordable Housing and Viability SPG states that, in London, in most circumstances affordable building credit will not be appropriate. The guidance it provides is to be used only in circumstances where boroughs consider it might be appropriate.</p> <p>We have considered its appropriateness in the borough and concluded that it is not needed to kick start development. The affordable housing need in Tower Hamlets and London remains extremely high. We have taken into account the guidance provided in the GLA Affordable Housing and Viability SPG and concluded that the limited circumstances, the GLA outline, will not need to be applied in the borough.</p>

Chapter 3: Creating Attractive and Distinctive Places.			
Number of responses: 133			
Summary of main Issue	Relevant Policy	Respondent	LBTH Response/Action
Design policies are overly-restrictive and do not take into account viability constraints of sites. Policy requirements may require higher quantum of development.	S.DH1.	Developers \ landowners	The Local Plan policies should be considered as a whole and are a vital tool in delivering high quality design through the planning process. The Local Plan policies have been subject to viability testing and the financial viability of sites will be assessed as part of the development management process. Further guidance is contained in the Development Viability SPD.
Amend the policy supporting text to recognise the importance of pedestrians as important users of main streets.	D.DH2.	Statutory consultee (Transport for London)	We will amend the first bullet point ('main streets') in paragraph 3.17 of the supporting text to refer to 'buses, cyclists and pedestrians' to respond to the representations that have stated that pedestrians are also important users of main streets and to make it consistent with the other parts of the paragraph.
To reflect the terminology of the NPPF, we suggest that use of the word 'preserve' is replaced with conserve, and that the term heritage asset is used rather than historic asset. This change can also be made elsewhere in the document To avoid any potential misinterpretation, we recommend the following change to the text: '... and will require any nationally important remains to be conserved permanently in situ, subject to consultation with Historic England'. The current wording could potentially be taken to mean that it would be possible to move archaeological assets to another position on the development site.	S.DH3.	Statutory consultee (Historic England)	We agree with the recommended changes and have proposed these in the minor modifications table.
Policy S.DH3 (heritage & the historic environment) and policy D.DH6 (tall buildings) should be added to the policy links section.	S.DH3.	Statutory consultee (Historic England)	We have decided not to include links to policies in the same chapter as all policies within the same chapter should be considered as a whole. The policy references only include references to policies in other chapters where these are particularly relevant to the application of a particular policy.
Move parts 4 and 5 under policy S.DH3 to part 2 to reflect the significance of designated heritage	S.DH3.	Developers \ landowners	This wording of the policy has been discussed and agreed with Historic England. It is considered to fully respond to the NPPF in relation to designated and non-designated assets by stating that proposals



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assets.			must be developed "in a manner appropriate to their significance".
Proposals for new tall buildings should take into account colour in relation to the impact on LVMF views.	D.DH4.	Statutory consultee (Maritime Greenwich World Heritage Site Coordinator)	We will insert words into the supporting text (paragraph 3.47) to ensure this is taken account of by requiring new developments to make appositive contribution to the skyline in terms of their use of palette and texture, in particular where these buildings will have an impact on long-distance views.
The policy should identify where views and skylines that are components of the 24 places of Tower Hamlets are. Clarification sought of the wording relating to the designation of skyline of strategic importance (paragraph 3.45).	D.DH4.	Developers \ landowners	These views come from the Conservation Area Character Appraisals and Management Guidelines. These are referenced in policy D.DH4 (part 1d), paragraph 3.48 and in the listed evidence links. The "Skyline of Strategic Importance" is a new definition in this plan and is explained in paragraph 3.45. We will provide further justification of this approach in a topic paper on views and landmarks to support policy D.DH4.
Make reference to ICOMOS guidance on heritage impact assessments for proposals affecting world heritage sites.	D.DH5.	Statutory consultee (World Heritage Site Coordinator)	We will make reference to the 'Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS, January 2011) in the evidence links section under policy D.DH5.
Delete the reference to 'exceptional architectural quality' in policy D.DH6.	D.DH6.	Developers \ landowners	Meeting the criteria in policy D.DH6 (parts 1a to 1l) is considered to be important when considering proposals for new tall buildings inside and outside tall building zones to ensure proposals achieve exceptional architectural quality. A minor modification to policy D.DH6 (part 1) to clarify that 'exceptional architectural quality' will be based on meeting the criteria in part 1 (a-l)
Clarify drop-down in heights required in the Canary Wharf tall building zone.	D.DH6.	Various	Further guidance on acceptable heights in the "Canary Wharf tall building zone" is contained in policy D.DH6 (part 2) and the Tall Building Study that forms part of the evidence base to policy D.DH6.
Tall building zones are unnecessary and opportunity areas and site allocations should be considered appropriate for tall buildings. Unclear whether proposals outside tall building zones need to meet all the criteria in part 3.	D.DH6.	Developers \ landowners	Emerging London Plan policy encourages boroughs to identify where clusters of tall buildings could come forward. We do not consider it appropriate to designate all opportunity areas/site allocations as tall building zones. This is due to the extent of these areas and that not all parts of these areas are appropriate for tall buildings to be established due to connectivity and heritage constraints. This does not mean tall buildings will be precluded outside tall building zones, but that they will need to address additional criteria in part 3 relating to design and infrastructure provision.  A minor modification will be made to part 3 (policy D.DH6) through the deletion of part d for clarity, and the insertion of additional text in paragraph 3.74 relating to the definition of strategic infrastructure provision. For further details of this refer to the minor modifications table.
Tall buildings policy is	D.DH6.	Developers	Tall buildings are not precluded outside the tall

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insufficiently flexible and does not include all areas of the borough suitable for tall buildings, specifically the Tower Hamlets Activity Areas which border the CAZ.		\ landowners	building zones as long as they comply with the criteria in policy D.DH6 (parts 1 and 3). The policy seeks to strike an appropriate balance between flexibility and prescription in responding to proposals for new tall buildings. Policy D.DH6 and the supporting text (paragraph 3.74) will be amended to provide greater clarity on the unlocking of strategic infrastructure constraints, and the definition of strategic infrastructure.
The Tall Buildings Study does not provide an appropriate and robust evidence base.	D.DH6.	Developers \ landowners	The Tall Buildings Study was informed by a spatial analysis of the borough and a review and assessment of the current development pressure/development pipeline for tall buildings across the borough. The identification of appropriate, inappropriate and sensitive areas for tall buildings was in response to the London Plan and Historic England recommendations and supported by a detailed characterisation study.
Amend wording in part 3a to allow greater flexibility to locate tall buildings in town centres.	D.DH6.	Developers \ landowners	Town centres have not been identified as tall building zones and proposals for tall buildings in these areas will therefore have to comply with criteria in policy D.DH6 (parts 1 and 3). While certain locations in town centres may be suitable for tall buildings a blanket policy allowing tall buildings is not appropriate due to varying heritage, townscape and accessibility constraints.
Confirm meaning of infrastructure in relation to application of policy D.DH6	D.DH6.	Developers \ landowners	For clarity, we will delete part 3d of policy D.DH6 as 3c already refers to infrastructure constraints. Paragraph 3.74 will be re-worded to reference the different types of strategic infrastructure that may be considered appropriate in the application of part 3c.
Provide clarity on how over-development is defined, and the radius for consideration of cumulative impacts. Policy should refer to increased densities adjacent to transport interchanges	D.DH7.	Developers \ landowners	This is further explained in the supporting text (paragraphs 3.77 and 3.78). The plan should be read as a whole in relation to how the impacts of development can be mitigated through planned improvements to existing infrastructure. Minor modifications are proposed to policy D.DH7 (part 1 and paragraph 3.79) in relation to how cumulative impacts will be assessed.  Policy S.TR1 expects development to be focused within areas with high levels of public transport accessibility and/or town centres. We do not consider it necessary to repeat this in D.DH7
Further clarity is sought on how development exceeding the density guidelines set out in the London Plan will be assessed.	D.DH7.	Developers \ landowners	The policy is in conformity with the current London Plan density policy. For ongoing clarity and consistency, minor modifications will be made to the supporting text to the policy to refer to London Plan density 'guidelines' instead of the current density range which is proposed to be removed from the London Plan. By taking this approach the criteria in the policy relating to the consideration of the cumulative impacts of development can still be applied to proposals in excess of the current London Plan density range and any future guidelines that may replace the density ranges.
The policy should make	D.DH7.	Developers \	Policy D.DH7 refers to guidelines set out in the

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reference to ability of sites in opportunity areas to exceed density guidelines in the London Plan		landowners	London Plan, which includes specific guidance relating to the opportunity areas. We do not believe it is necessary to make an additional reference to opportunity areas as this policy will be triggered in relation to any development that is proposed that will exceed these densities, whether or not it is located in an opportunity area.
Delete policy D.DH7 as it repeats London Plan guidance and is therefore unnecessary.	D.DH7.	Developers \ landowners	Policy D.DH7 provides guidance on where developments which are proposed that are in excess of sustainable density thresholds. This includes additional criteria on design and infrastructure provision that will be required to mitigate the impact of very dense developments.
Policy should contain flexibility for habitable rooms to have an acceptable level of daylight and sunlight 'wherever possible' to be consistent with guidance in the Housing SPG (GLA, 2016).	D.DH8.	Developers \ landowners	The supporting text refers to a sunlight and daylight assessment to allow effects on daylight and sunlight levels to be considered as part of planning applications when they are submitted. The wording of the policy is considered to allow application of the guidance in the Housing SPG (GLA, 2016).
Clarify how an active frontage can be maintained at all times.	D.DH9.	Developers \ landowners	We will amend paragraph 3.94 of the supporting text to clarify how shopfronts can be designed to maximise active frontages at all times.

Chapter 4: Meeting Housing Needs.			
Number of responses: 116			
Summary of main Issue	Relevant Policy	Respondent	Council Response/Action
Remove the reference to sales to Londoners as this is not appropriate, deliverable or enforceable.	S.H1.	Developers \ landowners	This policy is considered appropriate and deliverable. The supporting text (paragraph 4.26) outlines the research demonstrating its necessity and the mechanism through which it will be delivered and enforced. The Mayor of London's Housing Strategy has committed the Mayor to developing new approaches to deliver the objective of ensuring that Londoners have an opportunity to purchase new homes before they are marketed overseas.
Objections to the housing mix how it interacts with the threshold approach to viability.	S.H1.	Developers \ landowners	The housing mix is based on an up to date SHMA and reflects the borough's objective to have a mixed and balanced community. We recognise the interaction between this requirement and the threshold approach requires further consideration. We will explore this further at the examination.
The proposed off-site affordable housing target should be reduced to ensure feasible housing delivery in the borough. The current threshold is considered unreasonable.	S.H1.	Developers \ landowners	The affordable housing target has been assessed in the Local Plan viability assessment and found to be viable.  The 50% off-site requirement has been viability assessed and found viable. The policy also indicates that this is subject to viability. The policy is designed to recognise the positive viability impacts off-site affordable housing delivery can have and ensure that value is captured for public benefit.
The small sites affordable housing	S.H1.	Developers \ landowners	Affordable housing contributions are considered necessary due to the role that smaller sites play in

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<p>contribution is onerous.</p>			<p>delivering housing (which is due to grow following the new London Plan approach to small sites) and the affordable housing need in the borough. It has also been tested and found viable in the Local Plan Viability Assessment. We are therefore confident that the policy will not affect the delivery of small sites</p>
<p>Request greater clarification on the relationship between the London Plan and Local Plan housing target.</p>	<p>S.H1.</p>	<p>Developers \ landowners</p>	<p>We accept that the Local Plan needs to address the current London Plan target. We acknowledge that at the point in time in which we assessed the housing trajectory there is a small shortfall in the last 5 years of the plan. The Housing Delivery Strategy outlines how we will seek to overcome this and indicates that the plan will be regularly monitored and reviewed if delivery does not increase. The GLA have accepted this position and consider the trajectory to be sound.</p>
<p>The Local Plan doesn't include the housing need calculated by the new standard national methodology.</p>	<p>S.H1.</p>	<p>Developers/ Industry Body.</p>	<p>The 'Planning for the right homes in the right places' consultation is explicit that plans which will be submitted to the examiner before March 2018, as this plan will be, do not have to address these indicative assessments in their draft Local Plans. Therefore we will not be nor do we need to undertake a new SHMA.</p>
<p>The SHMA methodology is flawed as it calculates affordable housing need using benefits claimants as a proxy.</p>	<p>D.H2.</p>	<p>Developers \ landowners</p>	<p>We do not agree that the SHMA is flawed. The SHMA does use the degree of housing benefits claims as a proxy for those whose needs are not met by the market.</p> <p>Section 3 of the SHMA details how the affordable housing need is calculated. It is comprised of current unmet need (this includes concealed &amp; overcrowded households &amp; those in unsuitable accommodation) and projected future affordable housing need.</p> <p>Projected future affordable housing need is calculated using trends in the uptake of housing benefit and trends in the uptake of affordable housing (through projecting forward past rates of entry to affordable housing) as all householders entering social rent are also assumed to be in affordable housing need.</p> <p>Therefore, any household who the government have deemed should receive support with their housing costs (through benefits or subsidised rent) are counted as part of the calculation for projecting future affordable housing needs.</p> <p>Figure 35 of the SHMA provides a full overview of the different components of the affordable housing need figure. Figure 47 assesses affordable housing need against different types of affordable housing and makes it clear that the affordable housing need also includes those who would not receive housing benefit, but whose needs cannot be met in the market (i.e. those accessing intermediate housing).</p>

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			<p>The SHMA does not rely upon the private rented sector as a means of reducing affordable housing need; instead, it recognises that households in receipt of housing benefit can afford to access suitable housing in the market as they receive a welfare payment specifically for this purpose, so it would be inconsistent with the NPPG to count these households as needing affordable housing (ID 2a-024): “care should be taken ... to only include those households who cannot afford to access suitable housing in the market”</p> <p>Both the NPPF and NPPG are clear that if a household can afford to rent, but cannot afford to buy a dwelling, they are not in affordable housing need. The SHMA notes that this may change in the near future if details of starter homes are added to the NPPF and NPPG.</p> <p>It is important to note that if the affordable housing need was under-assessed, this would not mean that the objectively assessed need (OAN) would be under assessed as the affordable housing need is a percentage of the OAN.</p>
<p>The SHMA doesn't provide sufficient evidence to support the proposed bedroom mix.</p>	<p>D.H2.</p>	<p>Developers \ landowners</p>	<p>Chapter 2 of the SHMA outlines the data sources for the demographic projections. The ORS housing mix model considers the need for market and affordable housing on a longer-term basis that is consistent with household projections and Objectively Assessed Need (OAN).</p> <p>This model assumes that the housing mix needed by households of each household type and age will reflect current patterns. As such the need for family housing will still be counted where such households continue to live in family housing despite no longer having family living with them. Given the lack of a clear mechanism or incentive to encourage households to downsize there is little any planning authority can do to address under-occupation.</p> <p>A number of legislation, guidance and evidence changes since 2013 have resulted in households who may have appeared in affordable housing need in 2013 now not appearing to require affordable housing. This has largely affected the need for intermediate housing where households who can afford to rent privately by spending more than 25% of their gross income on rent are no longer counted as being in affordable housing need. The key legislation and guidance changes resulting in this are summarised below:</p> <ul style="list-style-type: none"> <li>• The evidence in the 2015 SHMA and SHMA 2017 update supersedes that within the previous SHMA.</li> <li>• A fundamental revision of the definition of affordable housing need in the NPPG in 2014 which offers a looser definition of affordability</li> </ul>

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			<p>based upon not being able to afford market housing. This superseded the 2007 SHMA practice guidance definition which adopted a very strict test of affordability based on a fixed percentage of income spent on rent.</p> <ul style="list-style-type: none"> <li>The 2011 Localism Act provided new opportunities for local authorities to reconsider their local housing needs, particularly housing registers. This has resulted in housing registers typically falling.</li> </ul> <p>The variation in size and tenure between Tower Hamlets 2015 SHMA and 2017 SHMA update is a result of the definitional changes described above in the NPPG and a change in the approach to modelling used for each respective SHMA. This change in approach is described below:</p> <ul style="list-style-type: none"> <li>The GLA 2013 SHMA is different to any other in England as it used the pre-NPPG definitions of affordable housing need and accounted for market signals differently. The Tower Hamlets SHMA 2015 replicated the GLA SHMA for consistency, however the SHMA 2017 update moved away from this approach to one more generally used by ORS in the rest of England.</li> <li>It is important to note that the Tower Hamlets SHMA 2015 &amp; SHMA update 2017 used different GLA population and household projections as these are updated by the GLA annually. This had an impact on the size and tenure mix across Tower Hamlets.</li> </ul>
The intermediate mix is unaffordable and undeliverable.	D.H2.	Developers \ landowners	<p>This policy approach reflects the new GLA affordable housing products and seeks to deliver intermediate units which are more affordable via London Living Rents.</p> <p>The intermediate housing SHMA need was calculated using the LLR rent levels and need as such reflects their greater affordability. Policy D.H2 and the supporting text (paragraph 4.30) explicitly prioritise large intermediate units for London Living Rent and indicate that units whose market value is over 600,000 are unsuitable for shared ownership.</p> <p>Whilst we acknowledge that supplying intermediate living rent products is more expensive for developers than shared ownership products, our viability testing has found these to be viable and as such we support this approach.</p>
It is misleading to reference market units in an affordable housing policy.	D.H2.	Developers \ landowners	<p>It is acknowledged that it is confusing to refer to the policy as an affordable housing policy and include market housing requirements. We propose a minor amendment to rename the policy D.H2 (“mixed and balanced communities”) instead of “affordable housing”.</p>

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<p>The affordable housing policies should include reference to viability considerations if the 35% on-site affordable housing provision cannot be met.</p>	<p>D.H2.</p>	<p>Developers \ landowners</p>	<p>Policy S.H1 addresses the 35% affordable housing requirement on site, and does indicate that this is subject to viability. A viability assessment will be required where developments indicate they are only able to provide less than 35% affordable housing.</p> <p>Additionally, policy D.SG5 (one of the linked policies for S.H1) requires developments to fulfil developer contributions requirements in line with the Tower Hamlets Planning Obligations SPD and Development Viability SPD. The Development Viability SPD acknowledges that the borough will have regard to the threshold approach set up by the GLA. This is also described in section 4.18 of the supporting text, which makes it clear that levels lower than 35% will be required to provide a viability assessment. We will clarify this by adding the following wording to this paragraph: ‘Applications that do not meet policy requirements will be subject to viability re-appraisals. Further guidance is provided in the Development Viability Supplementary Planning Document.’ The SPD will also be added to the evidence links under policy S.H1.</p>
<p>Policy D.H2 prioritises the delivery of affordable homes which aren’t affordable locally and intermediate housing which doesn’t meet the affordable housing needs in the borough.</p>	<p>D.H2.</p>	<p>Residents.</p>	<p>The policy still requires a split between rented affordable houses and intermediate houses of 70% and 30% (D.H2.1). This is the same as the adopted Managing Development Document. Within the 70%, 50% should be London Affordable Rent which is the equivalent of target rents, the lowest rents we currently require under the Managing Development Document.</p> <p>Within the 30% intermediate requirement, the requirement for family unit provision has increased from the Managing Development Document requirement. This reflects the new Mayor of London intermediate tenure (London Living Rent) which is more affordable to local residents. This split seeks a greater delivery of affordable family homes than the Managing Development Document.</p>
<p>The affordable housing contributions should acknowledge build to rent and co-living products.</p>	<p>D.H2.</p>	<p>Developers \ landowners</p>	<p>We recognise the strategic role of these products, however they do not meet local need in Tower Hamlets, and as such we do not consider it a locally beneficial trade-off to reduce affordable housing contributions in order to promote their delivery. We therefore expect these products to meet the same affordable housing requirement as build to sell developments.</p>
<p>Approach to incremental development is contrary to the National Planning Policy Framework (NPPF).</p>	<p>D.H2.</p>	<p>Developers \ landowners</p>	<p>The purpose of this policy is to ensure that affordable housing requirements are fairly and equitably applied on all residential developments, and there is no incentive to build schemes in a piecemeal, inefficient and disruptive fashion. Incremental developments would still be able to provide viability assessments to demonstrate delivery constraints where required. As such we believe this policy adds no additional burden to that</p>

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			which would apply to any residential development.
Estate regeneration should not be included in the plan and should not be counted towards affordable housing delivery.	D.H2.	Community organisation	The Local Plan is a 15-year plan. There will be estate regeneration schemes taking place in the borough over that period. There are a number of estate regeneration schemes in the planning system, including Blackwall Reach and Chrisp Street. Removing the policy from the plan would reduce the ability for the council to direct how estate regeneration is carried out and limit the council's ability to ensure that affordable housing, open space and community facilities are all protected.
Object to the requirement for two lifts for the most accessible form of housing which is socially rented.	D.H3.	Statutory Consultee (Greater London Authority)	Further evidence on the rationale behind this requirement will be undertaken to strengthen our position at the independent examination.
The child yield calculator conflicts with the GLA child yield calculator.	D.H3.	Developers \ landowners	<p>Tower Hamlets already has its own child yield calculator which is regularly used instead of the GLA calculator. This simply updates it and is based on the most relevant dataset and provides outputs against the required age ranges.</p> <p>The GLA child yield calculator is based on research undertaken by LB Wandsworth from a site occupation survey (in which they surveyed around 4,000 units built in Wandsworth between 1997 and 2003 from which they had a 50% response rate).</p> <p>The nature of development in Wandsworth and Tower Hamlets, as well as of the population (not least the % of the population which are children), are very different. As such the GLA child yield is considered inappropriate for this borough.</p>
Student housing policy is too restrictive	D.H6.	Developers \ landowners	We propose a minor amendment to give more flexibility regarding suitable locations within the student housing policy.

Chapter 5: Delivering Economic Growth			
Number of responses: 100			
Summary of main Issue	Relevant Policy	Respondent	Council Response/Action
The floorspace proportions set out within the policies, specifically relating to the secondary POL and the CAZ zone C (now CAZ tertiary area), are unjustified and overly-prescriptive. They are not required to meet employment targets and could prejudice redevelopment opportunities.	S.EMP1 & D.EMP4.	Developers \ landowners	<p>The council's approach to the Secondary POL and the CAZ tertiary area is justified and supported by evidence (Employment Land Review) given the need for significant additional floorspace to meet projected need. It is considered that the floorspace thresholds specified within this policy provide a useful guide to development within employment locations which aim to protect the strategic function of the CAZ.</p> <p>However, it is accepted that some amendments are required. Therefore, the policy and supporting text has been amended to better reflect the CAZ SPG and to allow more flexibility on a case-by-case basis in response to comments received.</p> <p>For example, amendments include a change of the</p>



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			<p>word ‘must’ to ‘should’ when meeting the floorspace thresholds. They also include a new part to the policy which states that where floorspace thresholds are exceeded, applicants must robustly demonstrate that the targets cannot be achieved and that the supply of sufficient employment capacity to meet future need is not being compromised.</p> <p>This approach helps to ensure that the proportion of Central Activities Zone (CAZ) uses will be negotiated on a site by site basis, with the objective of maximising CAZ uses in line with the CAZ SPG and the evidence set out in the Preferred Office Locations Boundary Review.</p>
The policy refers to ‘significant weight’ to office and other strategic CAZ uses in the secondary POL – this is inconsistent with ‘greater weight’ defined in CAZ SPG.	S.EMP1	Developers \ landowners	The policy wording will be amended in order to reflect these representations and ensure greater alignment to the CAZ SPG. This includes changing the wording from ‘significant weighting’ to ‘greater weighting’ as per the SPG.
The 50% target in the CAZ tertiary area is contrary to the ‘equal weight’ set out in the CAZ SPG.	S.EMP1 & D.EMP4.	Developers \ landowners	Whilst we accept that residential and non-residential uses have equal weight within CAZ zone C (now CAZ tertiary area), as per the CAZ SPG, the approach to restricting residential floorspace above 50% is important in maximising the strategic function of the CAZ in accordance with our evidence (Employment Land Review and Preferred Office Locations Boundary Review). Nevertheless, we have built in some flexibility to this policy wording to say that residential uses ‘should generally not exceed 50% of the total floorspace’.
The policy suggests sole office developments or other sole strategic CAZ functions are not acceptable within the CAZ tertiary area.	S.EMP1 & D.EMP4	Developers \ landowners	Comment accepted. The policy has been amended to make it clear that employment-only development is appropriate in these locations.
There is a lack of consistency between the requirements under policies S.EMP1 and D.EMP4.	S.EMP1 & D.EMP4	Developers \ landowners	It is accepted that there were inconsistencies between these two policies. Both have now been amended to ensure that they are entirely consistent.
The 20% target for the Tower Hamlets Activity Areas is too low. The target should be omitted or increased which is more realistic to meet strategic growth targets.	S.EMP1 (supporting text)	Developers \ landowners	It is considered that 20% figure is a useful overall minimum target, given that the Tower Hamlets Activity Areas are more mixed in nature but encompass parts of other designations, such as the Whitechapel Local Employment Location, where a higher proportion of employment space would be anticipated.
The 10% requirement for affordable workspace on large commercial schemes is unjustified.	D.EMP2	Developers \ landowners	It is accepted that the justification for the 10% figure should be made clearer; therefore, further evidence on the rationale behind this requirement will be undertaken to strengthen our position at the independent examination.
The policy must	D.EMP2	Developers \	A viability assessment has been undertaken which

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recognise the viability implications of this requirement.		landowners	proves that this policy is viable and this will be summarised within the new evidence base. Furthermore, a reference has been added to the supporting text in paragraph 5.25 to make it clear that this policy is 'subject to viability'.
More clarification is needed for this policy, including: whether floorspace is 'net or gross'; the definition of 'commercial floorspace'; and the definition of affordable workspace.	D.EMP2	Developers \ landowners	<p>It is accepted that further clarification is required on these issues. The supporting text in paragraph 5.24 has been amended to provide further detail and clarification in terms of:</p> <ul style="list-style-type: none"> <li>• clarity over 'major commercial development' and 'gross' floorspace; and</li> <li>• clarity over the application of the policy in terms of the need to work closely with our employment and enterprise team to determine the scale and nature of the development of a case by case basis. This approach helps to give the applicant more certainty that these details will be determined during the application process.</li> </ul> <p>Please also note that a glossary definition for affordable workspace has been added to provide more clarity of the council's definition.</p>
More clarity is needed as to whether the policy should be applied generically across borough or specific areas.	D.EMP2	Developers \ landowners	The policy adopts a borough wide approach to the affordable workspace thresholds (which provide the default position), but proposals will be developed/assessed on a case-by-case basis which will take into account locational factors. More information on this issue will be contained within the new evidence base.
The policy should contain flexibility for off-site contribution.	D.EMP2	Developers \ landowners	By default, the affordable workspace should be provided on-site, but it is considered that there is sufficient flexibility within the policy to consider alternatives given that schemes are assessed on a case by case basis.
Issues were raised in relation to the need to work with our workspace providers which can be seen to be 'anti-competitive'.	D.EMP2	Developers \ landowners	Further flexibility has been added to the supporting text in paragraph 5.24 to give the option for applicants to manage the space either themselves or in association with a provider not included on an approved list, provided we can agree on these terms.
The policy omits a reference to site allocations.	D.EMP2	Developers \ landowners	The policy and supporting text has been amended to include employment space within site allocations.
Reference to 'potential sites' within D.EMP3.1 should be deleted – it contradicts S.EMP1.1 which allows sites within Secondary POLs to come forward for non-employment uses.	D.EMP3	Developers \ landowners	For clarity, the reference to 'potential sites' has been removed from the policy and supporting text.
More clarity is needed as to what 'benefits of alternative use' means. It should be made	D.EMP3	Developers \ landowners	It is accepted that further clarity should be provided on this issue. The supporting text to policy D.EMP3 has been amended to provide further clarity regarding alternative uses (e.g. within town

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explicit what type of benefits the council will seek to balance.			centres) to maintain active uses and frontages.
The requirement for 24 months evidence for loss of employment is unjustified and restrictive and should be relaxed.	D.EMP3	Developers \ landowners	The council's evidence (Employment Land Review) highlights a need for significant additional floorspace to meet projected need, partially addressed by maintaining existing floorspace where it meets need. The report recommends that a more stringent requirement is needed for the market testing of occupier interest, and that 24 months is a suitable period because it will allow for remarketing should a first market offer fail to attract interest. Furthermore, in line with the report's recommendations, paragraph 5.30 of the supporting text provides some flexibility where it is considered that this requirement is too onerous on certain sites, particularly redevelopment sites.
There is a concern in relation to the Local Employment Location (LEL) requirements and the flexibility for uses within this designation, particularly in relation to the Whitechapel LEL.	D.EMP4	Developers \ landowners	It is considered that the plan already offers sufficient flexibility in relation to LELs in terms of different uses and user types. It is also considered that the Whitechapel LEL designation is entirely consistency with the Whitechapel Site Allocation and the Whitechapel Vision Masterplan SPD.
At present, uses on the gaswork site are sui-generis and do not relate Cambridge Heath LEL. Therefore, the gasholders should be removed from LEL, or provide clarity that gasholders are not viewed as existing floorspace to protect.	D.EMP4	Developers \ landowners	It is not considered necessary to specifically refer to or identify gasholders within this policy. The Local Employment Location designation at Cambridge Heath merely seeks to retain the existing employment function and character of the area, and promote the delivery of additional employment space of the types specified in policies S.EMP1.1 and D.EMP4.4f across the designation. This will help meet the borough's overall employment projections and further enhance the vibrancy of the LEL and corresponding designation across the border in Hackney.  It is not considered, given the nature of gasholders, that they would meet the definition of sui generis industrial functions articulated in paragraph 5.6. As such, there would be no requirement to re-provided the gasholder floorspace as employment space.

**Chapter 6: Revitalising Our Town Centres.**

**Number of responses: 65**

Summary of main Issue	Relevant Policy	Respondent	Council Response/Action
Request to change the status of Canary Wharf to a Metropolitan Centre.	S.TC1	Developers \ landowners	The London Plan is clear that Canary Wharf has the potential to be reclassified as a metropolitan centre over the plan period. We also recognise that Canary Wharf is now fulfilling this role which has been sufficiently recognised throughout the local plan (see policy S.SG1 and the supporting text to policy S.EMP1). Therefore, until the re-designation is official, we will not change the "major centre" reference in the Local Plan.

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<p>The policy should not seek to overly-prescribe percentages for A1 or non-A1 uses within town centres. Flexibility should be introduced to allow a successful mix of retail functions alongside other uses.</p>	D.TC2	Developers \ landowners	<p>It is accepted that the policy should include more flexibility. An amendment to the policy will be included to require that robust evidence is provided by the applicant where A1 floorspace cannot be maintained at the current level.</p>
<p>The 200sqm local retail threshold is too restrictive and may inhibit the delivery of larger units that form part of major regeneration proposals, particularly site allocations.  The policy is also inconsistent with bulky goods retail.</p>	DTC3	Developers \ landowners	<p>It is considered that the 200 square metres A1 threshold is justified and effective in order to prevent the borough's town centres being undermined. Further additional supplementary evidence will be provided demonstrating its suitability.  Please note: the council's position is not that any development over 200 square metres in an out of centre location should be refused permission, simply that the developments of this scale should pass an impact assessment (in addition to a sequential test) to be approved in accordance with the NPPF.</p>
<p>The policy should make clear whether net or gross.</p>	DTC3	Developers \ landowners	<p>The policy has been amended to clarify that it is referring to gross floorspace.</p>
<p>The policy is inconsistent with paragraph 24 and 26 of the NPPF in relation to the sequential test and the impact assessment.</p>	DTC3	Developers \ landowners	<p>It is agreed that a clearer approach in relation to the NPPF retail tests (paragraphs 24 and 26) is required. The policy and supporting text has therefore been amended to reflect these changes, clearly setting out that outside of the borough's town centres hierarchy, new retail development will be subject first to a sequential test; and then an impact assessment where individual units or extensions exceed 200 sqm gross floorspace.</p>
<p>Clarification needed as to whether there is a need for the words "and" or "and/or" after Part 3, section a.</p>	DTC3	Developers \ landowners	<p>Part 3 of policy D.TC3 would benefit from greater clarity; therefore "or" will be inserted after parts a. and b.</p>
<p>Betting shops are town centres uses and should not be excluded from certain parts of borough (i.e. primary frontages, neighbourhood centres, neighbourhood parades or other non-designated centres).  There is also no evidence to suggest that there is a link between health and betting shops.</p>	D.TC5	Businesses	<p>Our consultation on the Statement of Gambling Policy 2016 included concerns raised by members of the public that there were too many betting shops in the borough and that their proliferation was in areas of low income and youth vulnerability.  Further evidence has been compiled by the council's public health team to help explain our rationale. It demonstrates that the proliferation of betting shops can incur negative social and health impacts on local communities as well as harming the attractiveness, vitality and character of town centres. This is the reason why we have sought to restrict their proliferation within particularly important or vulnerable areas which attract high levels of footfall and activity.</p>
<p>There is concern over</p>	D.TC5	Businesses	<p>The approach taken to control the development of</p>

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<p>the 200 metre school buffer in relation to hot food takeaways. As a town centre use, these locational restrictions are unjustified and inconsistent with the NPPF.</p>			<p>new hot food takeaways has developed in light of increasing concerns of residents and politicians regarding the overconcentration of takeaways in the borough, especially where they tempt younger residents to consume food unhealthy foods that are high in fat, salt and sugar. There is also strengthening national and local evidence base and revised planning policy guidance relating to this issue.</p> <p>These policies form part of the council's overarching strategy to tackle the borough's obesity and food poverty problems. They aim to prevent hot food takeaways developing in areas disproportionately frequented by children (i.e. in close proximity to schools and local authority leisure centres). Similarly, by ensuring a balance of takeaways within our designated centres, the policy seeks to promote and protect healthy choices and retain the economic diversity of the borough, as well as protecting the attractiveness, vitality and character of primary frontages.</p> <p>Further evidence has been compiled by the council's Public Health team to help explain our rationale.</p>
<p>The policy assumes that all hot food takeaways offer limited choice and same poor standard of food.</p>	D.TC5	Businesses	<p>It is acknowledged that hot food takeaways are not the only source of foods that contribute to unhealthy lifestyles, and that not all hot food takeaways provide unhealthy/poor quality food, Nonetheless, within Tower Hamlets the overwhelming majority of hot food takeaway outlets do provide food of poor nutrition. Furthermore, it is considered that there is no guarantee that a healthy business model would continue into the future under an A5 use class and that it is not an unreasonable prospect that pressures on the business could lead to a change in the nature of the food sold despite the current best intentions of the appellants.</p>
<p>Hotels are a 'main town centre use' as defined by the NPPF and therefore should be no requirement to demonstrate need where proposed within designated centres.</p>	D.TC6	Developers \ landowners	<p>While it is accepted that hotels are a main town centre use and an important use to developing the visitor infrastructure of Tower Hamlets, it would be detrimental to the health of town centres should an over-concentration develop. Over-concentrations can harm the character of a place both directly (e.g. creating noise and disturbance for neighbouring residents) and indirectly (by generating a high level of transience in the overnight population).</p> <p>Furthermore, an over-concentration can also lead to a loss of land suitable for uses of greater priority, such as housing or employment. For example, hotels often provide lower employment densities according to the Employment Density Guide (Homes and Communities Agency, 2015), which means that other employment uses providing higher employment densities would be preferred where there was a conflict over available</p>

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			development land.
Appropriate locations for short-stay accommodation should include Local Employment Locations where they support the employment functions of the area.	D.TC6	Developers \ landowners	It is not considered necessary to reference local employment locations (LELs) within policy D.TC6, given that all LELs contain locations or designations where such provision can be supported.
Part c of the policy is not clear as in all cases space for housing or employment would be displaced by hotel use.	D.TC6	Developers \ landowners	It is considered that short-stay use would not displace housing or employment use in every circumstance. The primary objective is to ensure that viable sites for housing or employment to meet identified needs are not lost, for consistency with other policies such as S.EMP1. An amendment will be made to the policy to clarify that this requirement should take account of the council's housing trajectory.
Serviced apartments are typically sui generis use whereas apart-hotels are use class C1.	D.TC6	Developers \ landowners	The council's position is that serviced apartments that fall within the 90-day occupancy limit are considered to be C1 use, not sui generis. Therefore, we do not consider it is necessary to amend the wording.
Proposals for new markets must not undermine the borough's existing markets and town centre uses.	D.TC7	Businesses	It is considered that existing wording is sufficient to ensure that markets would not negatively impact existing centres and town centre uses. Part 2 of the policy requires that proposals for new markets 'enhance the centre's existing offer and contribute to vitality and cohesion'. Part 3 of the policy supports proposals for new markets outside of town centres only where they do not undermine the borough's existing markets and town.
The boundary of Chrisp Street district centre should be amended to include the former George Green college building and other possible redevelopment sites east of East India Dock Rd to assist in accommodating additional demand for town centre uses.	Policies Map	Developers \ landowners	We do not feel it is appropriate to extend town centre boundary at this stage which has been determined based on existing evidence of current/future need within the Town Centre Retail Capacity Study (2016), as well as site visits and consideration of built form.  We will review all town centre boundaries on an annual basis in order to reflect necessary changes or extensions to centres as a result of future redevelopment.
Support for the extension of the London City Island neighbourhood centre to Goodluck Hope to cement creative cluster coming forward.	Policies Map	Developers \ landowners	It is considered that the neighbourhood centre designation will be sufficient to facilitate the development of a creative cluster in this location given that there is a notable gap between commercial/leisure at City Island and the provision in Good Luck Hope. The Lower Lea Crossing marks a clear demarcation between geographical areas.  The Local Plan also does not preclude out-of-centre development and sets out the circumstances in which these uses will be permitted outside of town centres (i.e. where it does not undermine the vitality and viability of these centres).
Poplar should be	Policies	Developers	At this time, it is considered that the existing

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upgraded to a district centre and extended into Republic at East India Dock.	Map	\ landowners	boundary of Poplar High Street is appropriate. Retail uses can be supported at East India Dock in line with its LEL designation, in order to support the function of the area. The boundary of the town centre can be further reviewed as part of any future Local Plan review. Even with an extension, it is not considered that sufficient floorspace would be provided to justify designation as a “district centre”.
Brick Lane district centre is proposed to be extended (on south side of Hanbury Street. They are a natural extension of the district centre offering on Hanbury Street.	Policies Map	Developers \ landowners	We do not feel it is appropriate to extend Town Centre boundary at this stage which has been determined based on existing evidence of current/future need within the Town Centre Retail Capacity Study (2016), as well as site visits and consideration of built form. Regarding the frontages in question, we feel the properties are too far removed from the Brick Lane shopping area to be included within the boundary, but are still covered within the activity area nonetheless, given them the same protections.  We will review all town centre boundaries on an annual basis in order to reflect necessary changes or extensions to centres.
Request that the City Fringe Activity Area is extended to include whole of Tobacco Dock site to support delivery of a comprehensive co-ordinated scheme across the site.	Policies Map	Developers \ landowners	We do not feel it is appropriate to extend the activity area boundary at this stage. It is considered that there is already scope within the plan for employment uses to come forward on the Tobacco Dock site, and any potential future extension to the boundary would be reviewed at a future date once the employment floorspace has come forward.
The CAZ and Secondary POL boundaries on Isle of Dogs are drawn too tightly. The CAZ should be larger (based on the GLA SPG, 2016) and should include South Quay.	Policies Map	Developers \ landowners  Local Residents	It should be noted that the north of the Isle of Dogs is not within the CAZ, but is "functionally related" to it.  While it is acknowledged that South Quay is illustratively included within the GLA's CAZ SPG area, the council's evidence assessed that due to the nature of recent and proposed development around South Quay (predominantly residential) it does not accord with the CAZ SPG guidance for 'zone B'. However, the 'Tower Hamlets Activity Area' designation and more stringent evidence requirements to justify loss/reduction of floorspace as part of redevelopment proposals means that new and re-provided employment floorspace at South Quay is encouraged, and this approach contributes to the objectives of the CAZ SPG in terms of delivering additional jobs and floorspace to meet need. The Tower Hamlets Activity Area designation in place in this area promotes the mix of uses cited.

Chapter 7: Supporting Community Facilities			
Number of responses: 27			
Summary of main Issue	Relevant Policy	Respondent	LBTH Response/Action

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<p>Requests to include a specific policy that relates to sport facilities. Raised a preference to have individual policies for both outdoor and indoor sport facilities. Objects to the lack of up-to date evidence to address future priorities and needs.</p>	<p>General response to chapter.</p>	<p>Statutory consultee (Sport England)</p>	<p>Indoor sport facilities are a type of community facility and the Indoor Sport Facilities Strategy tells us where they will be located.</p> <p>Policies and their supporting explanation paragraphs contained within chapter 7 will be amended to ensure that sport facilities are not given less priority than other types of development.</p>
<p>Part 1 does not highlight the function of existing community facilities therefore, a sports facility could be lost to another community use. The policy does not adequately address the 'provide' element of SE's policy.</p>	<p>S.CF1</p>	<p>Statutory consultee (Sport England)</p>	<p>The policy clearly specifies that indoor sports and leisure facilities are one type of community facility, which are protected against loss.</p> <p>Policy D.CF2 seeks to resist the loss of the borough's valuable community facilities, except in certain circumstances (see a and b).</p> <p>An amendment will be made to paragraph 7.14 of the supporting text to clarify that the loss of sports facilities will only be justified where an applicant can provide a robust assessment demonstrating surplus provision or where the proposal includes a replacement of the facility with at least an equivalent function, quality and quantity of sport provision that better meets the needs of the community.</p>
<p>Over allocation of schools, health and leisure facilities without clear justification</p>	<p>General response to chapter.</p>	<p>Developers / landowners</p>	<p>No change. Sufficient leisure and health facilities have been identified to meet the borough's future needs which will be met partially through the re-provision of existing facilities on the proposed site allocations.</p> <p>The Local Plan allocates more primary school sites than is required for the following reasons:</p> <ul style="list-style-type: none"> <li>• The council has a statutory requirement to deliver enough places but cannot guarantee any of the site allocations will be bought forward for delivery. The site allocations require comprehensive redevelopment and land assembly alongside major infrastructure to support large-scale housing and employment on relatively constrained development plots at high densities. The delivery of new schools will need to be carefully planned to ensure they can sensitively integrated into the overall development, whilst meeting the appropriate standards (including play space). Due to these constraints, in some instances, a site may only be able to deliver a 1 form of entry primary school.</li> <li>• For some sites when they come forward for delivery, demand in that particular area may indicate that only a 1 form of entry primary school is required.</li> </ul> <p>The over allocation of secondary schools is also due</p>



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			<p>to the uncertainty of sites coming forward in the right locations at the right time (4 out of 5 sites are required).</p> <ul style="list-style-type: none"> <li>• The extent of growth within the Isle of Dogs, South Poplar and Lower Lea Valley will place significant pressure on school places and existing infrastructure / services.</li> <li>• Land is scarce in the borough and there are only a limited number of available and suitable sites to accommodate new or expanded secondary schools. The majority of existing secondary schools have limited capacity to meet future needs arising from this growth.</li> <li>• Secondary school sites generally require larger plots as well as good access to public transport and services, particularly due to the fact that they have a wider catchment area than primary schools.</li> <li>• Demand varies considerably across the borough; some areas have a surplus, whilst others have a deficit.</li> </ul> <p>Other issues (particularly poor air quality and viability constraints, such as costs of decontamination) may also render an allocated site incapable of delivering a primary or secondary school when it comes forward during the plan period.</p> <p>More detailed work is being undertaken to assess the most recent school place projections following the household place survey which took place at the end of 2017, thus enabling us to determine which school sites should be prioritised.</p>
Remove proposed policy requirement to deliver community facilities. This requirement would result in 'double dipping' of contributions on development. Instead, the Council must ensure that CIL receipts are promptly distributed to organisations that have a responsibility to deliver community facilities, for example the National Health Service.	S.CF1	Developers & Barts Health NHS.	<p>The fact that the plan has allocated the provision of infrastructure on sites does not mean this infrastructure will be delivered using planning obligations, potentially resulting in 'double dipping'. The delivery mechanism for social infrastructure will be considered at application stage in light of the relevant regimes at that point in time (e.g. CIL "in-kind"). In addition, the plan also specifies (in para 2.42, part 3) that Financial contributions may be sought financially or 'in kind' – where the developer builds or directly provides the matters necessary to fulfil the obligation negotiated as part of the planning application. Where provision is made within developments, this will be credited to the scheme and may offset financial contributions that may otherwise be sought. However, financial contributions may be secured for reasonable fitting out and infrastructure costs and this is determined on a case-by-case basis.</p>
This policy is overly restrictive and risks preventing sites coming forward that could help	D.CF2	Developers /landowners	<p>LBTH considers that its policy approach is in line with NPPF and the current London Plan policies.</p>

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to meet the employment floorspace requirements.			
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<b>Chapter 8: Enhancing Open Spaces and Water Spaces.</b>			
<b>Number of responses: 55</b>			
<b>Summary of main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>LBTH Response/Action</b>
Lack of playing pitch evidence (Sport England)	General comment – Chapter 8	Statutory consultee (Sport England)	The Open Space Strategy includes an assessment of the boroughs playing pitches and outdoor sports facilities. In order to address Sport England’s concerns and ensure a robust evidence base a more detailed action plan will be developed based on the findings of the playing pitches assessment. This action plan will be included in the Infrastructure Delivery Plan and a reference to this plan will be included in the supporting text (see paragraph 8.11).
Remove the requirement for development to deliver open spaces. Concern raised over the potential for the council to ‘double dip’ when requiring contributions through both CIL and planning obligations.	S.OWS1.	Developers \ landowners	New development resulting in an increased demand for open spaces will be required to make an appropriate provision of new or enhanced public open space to contribute to the sustainable growth in Tower Hamlets.  The delivery mechanism for the delivery of social infrastructure will be considered at the application stage against the relevant regimes that apply at the time (for example, CIL ‘in kind’ levies).
Defining water spaces as land covered by water and the adjacent land is misleading.	S.OWS2 & Appendix 1: Glossary & acronyms.	Developers \ landowners	The words ‘adjacent land’ will be removed from the definition of water spaces in appendix 1: glossary and acronyms.
There is no detail on how the new park at ‘Millwall Slipway’ will be delivered. At present, the objective of a ‘new park at Millwall Slipway’ is not deliverable or effective.	S.OWS1 & Chapter 5: Sub-Area 4: Isle of Dogs & South Poplar.	Canal and River Trust.	The area of land referred to at Millwall Outer Dock pocket park in the Open Space Strategy is not the slipway itself but the adjacent land owned by the council. The Open Space Strategy shows the space and defines its function as a civic space and it accords with that function. This strategy is not the definitive arbiter that determines whether land should be considered open space. Inclusion of a space in the strategy is not the principal factor in applying policy OSW1 which protects all open space. In order to address this confusion point 16 of the development principles within section 5 (sub-area 4: Isle of Dogs and South Poplar) will be amended to remove the reference to ‘a new park at Millwall Slipway’.

<b>Chapter 9: Protecting And Managing Our Environment.</b>			
<b>Number of responses: 30</b>			
<b>Summary of main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>Council Response/Action</b>
A mix of responses were received on the environmental standards set out in the	Chapter 8 – General comments	Developers/ various statutory consultees	We believe that this mix of responses indicates that the policies have struck a balance between being overly prescriptive and too permissive and as such create a robust environmental

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<p>policies. Developers generally sighted that the policies are too rigorous while statutory consultees tended to sight they were not rigorous enough.</p>			<p>management framework for the borough.</p>
<p>16m buffer strip requirement along a tidal river is unnecessary and an inefficient use of land.</p>	<p>D.ES4.</p>	<p>Statutory consultee (Greater London Authority).</p>	<p>The 16m strip is included in the policy at the request of the Environment Agency. The policy and supporting text (paragraph 9.36) recognises that this will not always be possible and highlights alternative flood mitigation which can be put in places where it is evidenced this is required.</p>
<p>The Plan should include specific targets to address the need to improve air quality.</p>	<p>D.ES2.</p>	<p>Neighbourhood Forum.</p>	<p>Air quality neutral is a specific measurable standard and does form a target for each development.</p> <p>It is recognised that the draft London Plan (2017) introduces the concept of 'air quality positive' but this has yet to be tested at EIP.</p>
<p>Is it sustainable to put so much development in an area that is due to flood once every 100 years?</p>	<p>D.ES4.</p>	<p>Neighbourhood Forum.</p>	<p>It is recognised that a significant proportion of the borough is in flood zone 3a. Accordingly the borough has followed the requirements of the national planning policy framework and planning policy guidance and undertaken a sequential and exceptions test which indicates why development can be located in these areas, providing they undertaken all the required mitigation and flood defence requirements outlined in the Strategic Flood Risk Assessment.</p>
<p>The zero carbon standards are not justified.</p>	<p>D.ES2.</p>	<p>Developers/ Statutory consultees (Greater London Authority)</p>	<p>We recognise that the Written Ministerial Statement (WMS) in 2015 changed the government's position in relation to zero carbon. It also indicated that the government would be commencing the requirements of the proposed amendments to the Planning and Energy Act 2008, as announced in the Deregulation Act 2015. This has yet to occur, and the WMS does not outweigh the development plan. This was confirmed by the government during the debate on the Neighbourhood Planning Act in the Lords by Lord Bourne of Aberystwyth, Parliamentary Under-Secretary (Department for Communities and Local Government) (see Hansard 06.02.2017, volume 778, column 360). This policy maintains our current policy position and is in line with the GLA's Housing Supplementary Planning Guidance and draft London Plan.</p> <p>We have assessed the viability and deliverability of the zero carbon requirements. This confirms that both the onsite requirements and offsite payments are viable and deliverable. In exceptional circumstances, developments will be able to submit viability information to demonstrate why these standards cannot be met and these will be assessed during the development management process.</p>

<b>Chapter 10: Managing Our Waste.</b>			
<b>Number of responses: 18</b>			
<b>Summary of main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>LBTH Response/Action</b>
Objection were raised to the safeguarding of Ailsa Street, Empson Street and Bow Midlands (part of the LLDC Strategic Industrial Land designation) as areas of search and the safeguarding of part of Clifford House within the Empson Street SIL	S.MW1.	Developers \ landowners	<p>All existing waste sites are safeguarded for waste use through London Plan policy 5.17(G) and Local Plans must be in general conformity with the London Plan as specified in the test of soundness. The removal of these sites would result in non-conformity with the London Plan.</p> <p>Empson Street is a Strategic Industrial Location (SIL). This allocation means that the area is, in principle, suitable for waste uses. The London Plan identifies SILs as key locations for new waste facilities.</p> <p>Any application for a waste facility on an individual site within the Empson Street SIL will still be tested against the criteria set out in national, regional and local planning policies, including their impact on sensitive receptors.</p>
Concern was raised regarding the requirements for new development to incorporate innovative waste management systems that are easily accessible.	D.MW3	Developers / community organisation.	<p>Policy D.MW3 requires major developments to incorporate non-traditional waste collection facilities which include innovative waste management systems such as underground refuse systems (see part 2).</p> <p>We are amending the text in the policy to ensure that waste management systems are accessible.</p>

<b>Chapter 11: Improving Connectivity And Travel Choice.</b>			
<b>Number of responses: 33</b>			
<b>Summary of main Issue</b>	<b>Relevant Policy</b>	<b>Respondent</b>	<b>Council Response/Action</b>
Some statements in the chapter are not clearly identified and need supporting with evidence, analysis and data. In particular planned improvements and further infrastructure that is needed.	Throughout chapter.	Statutory Consultee	We note that all policy and supporting text is supported by evidence as set out in the 2016 Strategic Transport Assessment. We propose a number of modifications to clarify text regarding planned improvements and further infrastructure require. Please see the minor modifications table for details of the proposed amendments.
A separate policy might be appropriate relating to safeguarded wharves, which specifically relates to the safeguarded wharves in the borough.	S.TR1.	Statutory Consultee (Ports of London Authority)	We consider that sustainable freight should be covered under a single policy and that sufficient detail and protection is provided in relation to safeguarded wharves in policy S.TR1.
Policies should consider the cumulative impact of development.	D.TR2.	Councillor feedback	We have now amended paragraph 11.16 of the policy to reflect the 'cumulative' impact of development. Please see the minor modifications table for details of the proposed amendment.

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Concern was raised over restricted car parking which will cause difficulties for residents, including the use of disabled parking.	D.TR3.	Residents	The proposed car parking policy and standards are consistent with current national and regional policy. The standards do allow for appropriate levels of 'on-site' car parking depending on the accessibility of the site to public transport services. It requires that all new development is permit-free in terms of on-street car parking due to the lack of available permits in the borough. In terms of the provision of disabled parking spaces and electric changing spaces, both of these are subject to London Plan standards which we adhere to.
Update Policy D.TR3 to ensure that each parking space has access to the electric charging network, as well as delivery vehicles.	D.TR3.	Developers \ landowners	The existing and emerging Local Plan requires development to prioritise sustainable approaches to parking. This includes ensuring development provides parking bays and charging points for electric vehicles, based on the standards and design principles set out in the London Plan.  To address this comment, we have removed the reference to existing London Plan standard for 20% active and 20% passive electrical charging points for electric-vehicle charging in paragraph 11.33 under policy D.TR3 given that the standard is likely change in the new London Plan.
Request the inclusion of wording to enable future developments to sell off parking spaces. Also request that specific parking spaces for carers and health workers be included.	D.TR3.	Community Organisation	We do not accept that future development can sell off parking spaces as this is contrary to the objectives of the policy - new car parking must be provided for the benefit of the development only. In terms of disabled parking, the London Plan standard will apply and there is no parking provision requirement for carers and health workers.
There is an onerous requirement for smaller developments and the policy needs to set out which scale of development is affected by this policy.	D.TR4.	Developers \ landowners	We have amended paragraph 11.42 of policy D.TR4 to clarify this. Please see the minor modifications table for details of this amendment.
Financial implications to development adjacent to wharves should be acknowledged.	D.TR4.	Developers \ landowners	While the council's policy requires that development adjacent to wharves does not compromise its operation, no evidence has been submitted to justify that it is the case that such development will result in significant additional build costs. We will continue to consider viability at application stage on a site by site basis, so any costs identified in this regard can be accounted for in the context of the provision of planning obligations. It should also be noted that a viability study is an area-wide one that needs to account for the general cost characteristics of sites and not necessarily site specific costs that may arise such as in this case.
Residents commented on concern over a need to increase the provision of servicing on residential development	D.TR4.	Residents	The need for adequate servicing and delivery facilities within new developments is recognised in the Local Plan, as well as the potential impact on highway congestion if this issue is not managed properly. As a result, policy D.TR4 (part

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and highway congestion, particularly north of the Isle of Dogs.			b) seeks to ensure that the delivery of goods and servicing will be provided within the site curtilage in order to minimise impact to the highway. Regarding highway congestion, this is a key issue recognised in the Local Plan which is why it sets out the need to facilitate significant modal shift towards more sustainable forms of transport.
The policy should make reference to the potential for safeguarded wharf sites to accommodate an appropriate mix of uses where it can be demonstrated that these uses would not undermine or restrict the operation of the safeguarded wharf.	D.TR4.	Developers \ landowners	<p>We do not feel it is appropriate to include the proposed changes to policy D.TR4. So long as the safeguarding designation stands, this policy will aim to protect these sites from development in accordance with the London Plan.</p> <p>The Mayor of London is undertaking a review of the London wide network of safeguarded wharves which will involve a 3-month public consultation in 2018.</p>

Part 4: Delivering Sustainable Places Chapters 1-4.			
Number of responses: 165			
Summary of main Issue	Relevant Section	Respondent	LBTH Response/Action
Some respondents argue that some of the requirements relating to site allocations are too onerous and should take more account of viability, site constraints and market conditions. This includes the mix of affordable housing units and the provision of strategic open space and schools.	Various site allocation infrastructure requirements.	Developers/landowners	<p>We propose minor modifications to the text to take account of discussions with developers and landowners but the general thrust of the site requirements will be retained.</p> <p>Detailed viability work has been undertaken to consider the financial implications arising from the implementation of these policies. This concludes that the site allocations are viable and capable of being delivered (subject to negotiation on the provision of infrastructure and affordable housing at the planning application stage).</p>
New bridges / crossings (e.g. Aspen Way) and newly identified routes should be included as part of the infrastructure requirements.	Various site allocation infrastructure requirements.	Developers/landowners	<p>Developers are not expected to deliver all of the proposed bridges and routes and these matters have been taken into account in the delivery considerations of the relevant site allocations. The majority of these routes have been identified in the plan, as set out in the Green Grid Strategy Update. We are proposing minor modifications to the site allocation maps to reflect this update.</p>
Some developers / landowners have proposed boundary changes to the site allocations.	Various site allocations.	Developers/landowners	<p>These matters will need to be discussed at the examination in public. However, none of these changes would significantly affect the strategic direction of the Local Plan.</p> <p>The site allocation boundaries are based on existing site boundaries or have been carried forward from the existing adopted Managing Development Document. These boundaries may change over the course of the plan period in response to development opportunities. The precise location of these boundaries will be</p>

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			determined through the development management process.
Comments were received on the accuracy of figures and diagrams in the site allocation figures.	Various figures and diagrams.	Various	<p>We will make minor amendments to the figures and diagrams, where necessary. For example:</p> <ul style="list-style-type: none"> <li>the location of the gasholders at Marian Place gas works and The Oval;</li> <li>the reconfiguration of some of the routes; and</li> <li>clarification on the status of bridges (existing or proposed).</li> </ul> <p>We will also make it clear that these figures are for illustrative purposes only and some of the details may be subject to change through the development management process.</p>
Additional information on the context of sites were requested for a number of the site allocations.	Various site allocations.	Various	Additional information will be provided regarding the context of sites for the purposes of accuracy and clarification (e.g. Bow Common gasworks will include references to the adjacent conservation area and local nature reserve).
Site specific requirements: Greater flexibility over the delivery of strategic open space and other types of infrastructure.	Various site allocation infrastructure requirements.	Developers/landowners	<p>New strategic open space is required to meet the needs arising from development as well as help address existing deficiencies across the borough.</p> <p>The Local Plan provides sufficient flexibility to take account of site-specific and local market circumstances over the course of the plan period. Details of the provision of these elements on sites will be negotiated through the development management process.</p>
Site allocations generally lack detail of what sporting/recreation facilities are required to support growth.	Various site allocation infrastructure requirements.	Statutory consultee (Sport England)	<p>The open space policies of the proposed plan will apply to all site allocations where open space is required. The Open Space Strategy includes an assessment of the boroughs playing pitches and outdoor sports facilities.</p> <p>In order to address Sport England's concerns and ensure a robust evidence base a more detailed action plan will be developed based on the findings of the playing pitches assessment. This action plan will be included in the Infrastructure Delivery Plan.</p>
Some developers and landowners are objecting to their sites not being allocated.	Various site allocations and sub-areas.	Developers/landowners	None of the sites proposed in representations meet the capacity requirements. The provision of social infrastructure and a minimum of 500 net additional units is required to be included as a site allocation.
Respondents requested that the location of each gasholder at Marian Place Gas Works and The Oval be specifically labelled on figures and referred to in the supporting text.	Site Allocation: Marian Place Gas Works and The Oval.	Various	We will amend the figure to label the gas holders and amended the design principals to update the references to the gasholders.
Land contamination	Various site	Statutory	Additional bullet points will be included in the

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should be a delivery consideration to ensure that appropriate assessments are carried out prior to development.	allocations.	consultee (Environment Agency)	delivery considerations of the relevant site allocations.
Insert references to the Thames River Basin Management Plan 2015 in the delivery considerations for relevant site allocations.	Various site allocations.	Statutory consultee (Environment Agency)	Additional bullet points will be included in the delivery considerations of the relevant site allocations.
Request the incorporation of high density development within the design principals for site allocations outside of tall building zones.	Various site allocations.	Statutory consultee (Transport for London)	No changes are proposed as matters relating to density and tall buildings are addressed in policies D.DH6 and D.DH7.
Request amendments to routes and crossing on and within site allocation diagrams to provide consistency and clarity.	Various site allocations and sub-area diagrams.	Various	Various amendments have been made to site allocation figures and diagrams and these are set out in the minor modifications table.

Part 5: Monitoring And Delivery Chapters 1-6.			
Number of responses: 14			
Summary of main Issue	Relevant Policy	Respondent	Council Response/Action
There is no timescale for when infrastructure must be implemented before certain levels of residential development takes place. This results in areas of high growth that will have no adequate infrastructure.	Chapter 5: Monitoring and delivery	Residents	The role of the Infrastructure Delivery Plan (IDP) is to summarise the detailed information provided by the services across the council (such as education, health etc) all of which have a comprehensive understanding of infrastructure need and timing to ensure that new growth is well-supported by infrastructure. Indeed, the IDP does seek to digest this information to include high level information on the timing and phasing of infrastructure delivery in accordance with population projections. Please also note that the IDP will be updated on an annual basis in order to adapt our understanding of infrastructure need each year.
There is a large funding gap on infrastructure which the council needs to address via this local plan. The plan should identify where and how it can raise this fund to make the plan sound.	Chapter 5: Monitoring and delivery	Landowners\ resident associations	As identified in chapter 2 of the Infrastructure Delivery Plan (IDP) the council is acutely aware of the funding deficit which we are always looking to address through exploring several funding options. Please note: funding gaps are a part of the process when planning for infrastructure on a fifteen year timescale. Typically, secured funding applies to short term projects in a five year timeframe.



## **Appendix 1: Statutory Consultees**

1. Canal & River Trust
2. City of London Corporation
3. Department for Education
4. Environment Agency (London)
5. Historic England
6. Lee Valley Regional Park Authority
7. City of London
8. Royal Borough of Greenwich
9. Royal Borough of Kensington and Chelsea
10. London Borough of Hackney
11. London Borough of Newham
12. London Borough of Lewisham
13. London Borough of Southwark
14. London Legacy Development Corporation
15. Marine Management Organisation
16. Mayor of London and Assembly (GLA)
17. Transport for London (TFL)
18. National Grid
19. Natural England
20. Network Rail
21. NHS Property Services (London)
22. NHS Trust (London)
23. Port of Tilbury (London)
24. Sport England
25. Thames Water
26. Coal Authority

## **Appendix 2: General Consultees**

1. Ward councillors.
2. Resident associations.
3. Housing associations.
4. Police.
5. Health trusts and emergency services.
6. Other borough-wide groups and developers (where appropriate).
7. Other voluntary bodies some or all of whose activities benefit any part of the council's area.
8. Bodies which represent the interests of different racial, ethnic or national groups in the council's area; amenity societies, residents associations, association representing women and bodies which represent the interests of different religious groups in the council's area.
9. All people who have advised the council that they are interested in being informed about a particular plan being prepared.
10. Everyone registered on the council's planning policy database.