

LEASIDE AREA ACTION PLAN

REGULATION 18 CONSULTATION VERSION

APRIL 2021

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Figure 1: The Leaside AAP Area

1. Introduction

What is the Leaside Area Action Plan?

- 1.1. The Leaside Area Action Plan (AAP) is a planning document that sets out a strategy for growth and regeneration in the area from now until 2031. It sets out a vision for how the area will change, the policies the council will implement to help achieve this vision, the reasons for choosing these policies and the delivery plan for implementing the vision.
- 1.2. The AAP sets planning policies for the Leaside area relating to:
 - Improvements to the road layout and walking and cycling links
 - Access to jobs
 - Access to community facilities
 - The type and quality of homes in the area
 - The quality and type of parks and open spaces
- 1.3. The AAP forms part of the development plan. It should be read in conjunction with the Local Plan. All Local Plan policies are still applicable within the AAP area unless explicitly stated otherwise in the AAP.
- 1.4. This is a Regulation 18 consultation draft of the Area Action Plan – it sets out a proposed vision for the plan and a set of proposed policies. We would like to hear from you about whether this approach to the area is the right one.

Purpose of the Area Action Plan

- 1.5. This AAP is also an important means of developing a clear vision and identity for the east of Tower Hamlets. Despite the area being home to longstanding communities and areas of significant heritage and character, the area identified in this AAP lacks a single identity. This is likely down to a combination of factors including the relative isolation of the area from the rest of the borough, its historical role as a largely industrial area, and severance within the area due to major road infrastructure crossing through it. This AAP will help to develop a more cohesive vision for the area, and create a recognisable identity for Leaside.
- 1.6. This AAP is being prepared to ensure that the scale of development and change envisaged for the Leaside area up to 2031 is carefully managed and guided by a planning framework that meets the needs of the local community.

- 1.7. Over the next 20 years, substantial residential and commercial development is expected for the area. The Tower Hamlets Local Plan sets out an expectation for a minimum of 5,748 new homes between 2016-31 in the Lower Lea Valley sub-area – which includes most of the Leaside AAP area. The new London Plan, which plans for the period 2019-41, says that the Poplar Riverside Opportunity Area (which again includes most of the Leaside AAP area) “has the potential for 9,000 new homes and improved connectivity in a part of the borough with significant infrastructure challenges” (paragraph 2.1.46).
- 1.8. To gain a better understanding of potential housing delivery in the area, the Council has commissioned the Poplar Riverside Land Audit, which projected delivery across five year periods from 2016-41. This report found that with effective coordination of development and infrastructure delivery, the area could see up to 11,748 homes delivered by 2031 and 14,176 by 2041. These higher numbers would only be achievable with careful planning that delivers the right infrastructure to support development at the right times, and deliver social, economic and environmental gains for the community. In addition, the Land Audit anticipates that a total of 63,100sqm of new commercial development could be delivered in the AAP area by 2041.
- 1.9. Given the volume of change and development expected, this AAP is necessary to set principles and policies to guide development to help ensure that it meets the needs of current and future communities in and around the area. In addition, this AAP can support the anticipated development in the area by identifying sites where significant housing and employment-related uses will be delivered, in effect promoting growth where it is most needed or most suitable.
- 1.10. This AAP is also necessary to encourage stakeholders to consider infrastructure capacity issues in the area. Within the Leaside area there are areas of poor accessibility, due to a lack of public transport and physical barriers such as the A-roads and the River Lea, which have posed a barrier to development. The AAP can provide additional policies on the delivery of infrastructure and around intensifying and sharing land uses. These policies will help to facilitate development and balance the pressure for housing development with the creation of the facilities that communities need.
- 1.11. Finally, this AAP is necessary to provide local residents and businesses in the Leaside area with more information as to what the future development will entail and how it will affect them and their community. This AAP seeks to provide greater clarity and certainty as to where new development will likely take place, the rules guiding this development and the overall vision for the area.

Policy Context

1.12. The AAP will be part of the statutory development plan once adopted, and the policies in the adopted AAP will be a material consideration in planning decisions. It should be read in conjunction with the London Plan (adopted in 2021), the Tower Hamlets Local Plan (adopted in 2020) and any relevant neighbourhood plans that come forward in the area (at the time of writing, there are none). The AAP needs to be consistent with the policies set out in the government's National Planning Policy Framework. Figure 1 below shows the hierarchy of different planning documents in the area. National planning policy informs the creation of the local development plan, which in London consists of the city-wide London Plan (prepared by the Greater London Authority), the borough-wide Local Plan and location-specific Area Action Plans (prepared by the Council), and location-specific neighbourhood plans (prepared by local community groups and voted on in referendums). These four types of development plan documents should be read as a whole to understand what is expected of new development on a specific site. The GLA and the Council also prepare supplementary planning documents to provide additional guidance on how policies in development plan documents should be understood and applied.

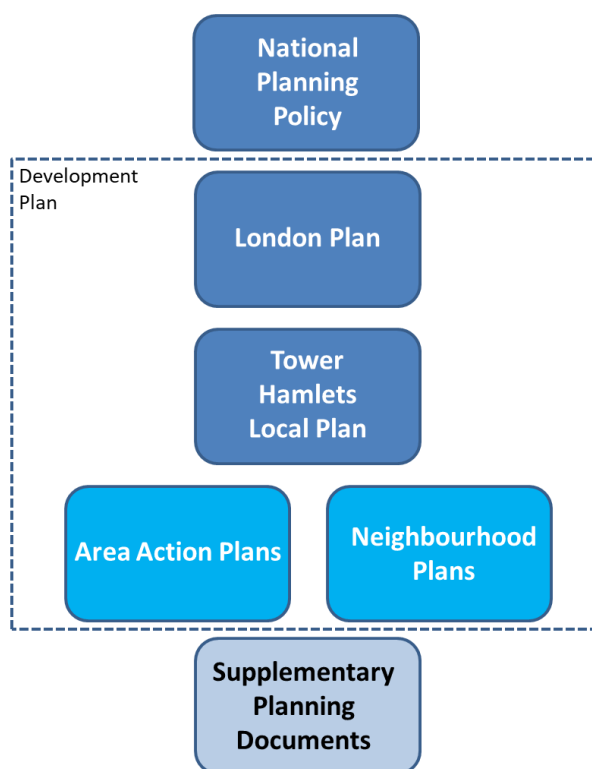


Figure 2: Planning documents within Tower Hamlets

The Name of the Area

1.13. Given that this area consists of a number of different communities with their own identities, there have been difficulties in choosing a suitable name for the AAP.

1.14. In different policy documents, this area has been given various names:

- Under the 2016 London Plan, this area was designated as part of the Lower Lea Valley Opportunity Area. The Lower Lea Valley OA covers a larger area than this AAP, stretching north towards Stratford and beyond. This name is also used in the Tower Hamlets Local Plan 2031, again referring to a larger area that reaches the northern boundary of the borough.
- Under the 2021 London Plan, this area is designated as part of the Poplar Riverside Opportunity Area. However, the Poplar Riverside OA also crosses the River Lea to include parts of Newham.
- In developing the evidence base for this draft of the AAP, we have often simply referred to the East of the Borough AAP. However, this name provides no real identity to the area, and the definition of where the east of Tower Hamlets begins could be quite subjective.
- We have considered referring to the area as Bow Creek, a name used for the lower reaches of the River Lea which runs through this area, but we are not sure if this is a well-understood name.

1.15. Therefore, to begin the discussion over what the area should be known as, it has been decided to refer to this draft as the Leaside AAP. This is an initial suggestion as to how the area should be identified, and we would like to hear from you about whether this is a suitable name or if there are other ideas for how to identify this area.

Consultation Questions - Introduction

- Is the name Leaside suitable for the area covered by the AAP? Do you have any other suggestions for what the AAP area should be called and why?

Consultation

1.16. This document is a Regulation 18 consultation version of the Area Action Plan under the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.17. The plan sets out the Council's initial ideas for the direction of the area, based on the evidence base that has been developed; the Council's priorities; and discussions with local residents, organisations, developers, and elected representatives. We are

consulting to find out whether the vision for the future of the Leaside area is appropriate, if you agree that the proposals in this draft will help to achieve this vision, and whether there are additional topics that should be covered by the plan.

- 1.18. Throughout the document, we have included specific consultation questions that we would like to know your thoughts on – and your opinions and ideas for any other element of planning for this area are also welcomed. If we've missed something that should be addressed – let us know. If we're taking the wrong approach to a problem – let us know. If our policy suggestions can be made more effective – let us know.
- 1.19. For ease of reference, the consultation questions are collected together in Appendix A.
- 1.20. Following the consultation period, we will prepare a consultation statement that summarises what comments were received and how they have been taken into account in developing a final draft of the Area Action Plan. This updated draft will then be consulted on later in 2021 (this will be under Regulation 19 of the Town and Country Planning Regulations), and the AAP will then be submitted to the Planning Inspectorate to arrange an Examination in Public. We hope that after a successful examination, the AAP will be formally adopted by the Council in the first half of 2022.
- 1.21. Alongside this AAP document, an Integrated Impact Assessment of the plan will be made available for consultation. This document incorporates a Sustainability Appraisal, Health Impact Assessment, and Equalities Impact Assessment of the proposals in the AAP. A Habitats Regulation Assessment will also be available for consultation, which examines the impact of the plan proposals on protected habitats.

How to comment

- 1.22. Comments on this document can be made in the following ways:
- Using the online portal at <https://talk.towerhamlets.gov.uk/leasideplan>
 - By email to planmaking@towerhamlets.gov.uk
 - By post to Strategic Planning Team, Tower Hamlets Town Hall, Mulberry Place, Clove Crescent, E14 2BG
- 1.23. The consultation period will be open for six weeks from 7 April 2021 to 21 May 2021. All comments received will be considered in drafting the Regulation 19 draft of the AAP.
- 1.24. In line with the Tower Hamlets Statement of Community Involvement¹, a consultation statement will be prepared afterwards setting out who was involved in the consultation, the main issues raised, and our response to those issues. We will aim to

¹ https://www.towerhamlets.gov.uk/Documents/Place_SCI_Strategy_v7.pdf

consult as widely as possible on this document, to gather a broad range of opinions. Due to restrictions related to the coronavirus pandemic, there will not be any in-person events held during the consultation, but will do our best to provide a range of methods for people to contact the Plan Making team for more information and to make their voices heard.

1.25. Three public webinars will be held, which will provide an introduction to the AAP and an opportunity for questions. An online drop-in session will also be held, allowing people to book a timeslot to talk to a member of the Strategic Planning team about the AAP. The sessions will be held at the following dates and times, and details for attendance can be found at <https://talk.towerhamlets.gov.uk/leasideplan>:

- Thursday 15 April, 5pm (webinar)
- Wednesday 21 April, 5pm (webinar)
- Thursday 29 April, 1pm (webinar)
- Tuesday 4 May, 2-6pm (bookable drop-in session)

2. Context

Spatial context

Boundaries

- 2.1. The Leaside AAP area is located to the eastern side of Tower Hamlets. It sits less than 1 mile northeast of Canary Wharf and around 3 miles east of the City of London. It is also close to the Olympic Park and the extensive Stratford City redevelopment to the north.
- 2.2. The River Lea forms the eastern boundary of the area, and the boundary between Tower Hamlets and Newham. The south of the AAP follows the River Thames, Leamouth Road, and the A13. The western boundary goes up Chrisp Street and Morris Road. The northern boundary is along Devas Street and Twelvetrees Crescent. The figure below shows the boundaries of the AAP area, which covers around 152 hectares, the majority of which sits in two wards, Lansbury and Bromley South.
- 2.3. This boundary has been chosen to include relevant parts of the Leaside area while reflecting existing planning boundaries. The western boundary (along Chrisp Street, Morris Road and Violet Road) and southern boundary (along East India Dock Road) line up with that of the Lower Lea Valley sub-area from the Tower Hamlets Local Plan. The northern boundary marks where the Poplar Riverside Opportunity Area meets the Olympic Legacy Supplementary Planning Guidance area. To the south, we have included a small area of the Isle of Dogs and South Poplar sub-area from the Local Plan, to strengthen our focus on connectivity within the area and beyond by including the River Lea to its mouth and including potential important connections to Newham at the Leamouth peninsula. This area is also made up of two important planning designations – the Metropolitan Open Land and Site of Importance for Nature Conservation at East India Dock basin, and the Leamouth Tall Building Zone that covers the rest of the area.

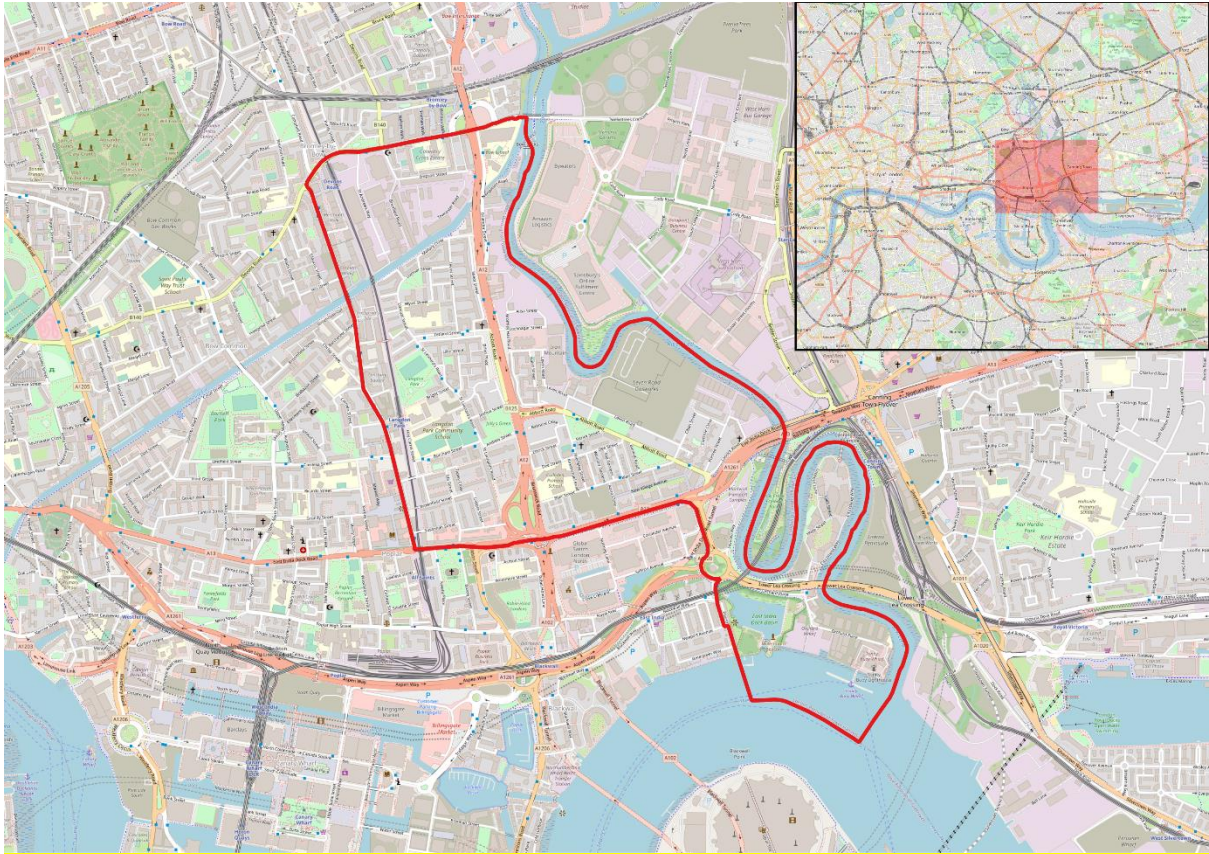


Figure 3: The AAP area, in the wider London context

People

- 2.4. The population of the Leaside area differs from the rest of the borough in a number of ways, in particular this area is denser, younger and more ethnically diverse.
- 2.5. *Population Density*: the Leaside area is densely populated, with 163 residents per hectare in 2018, which is slightly denser than average for Tower Hamlets (161) and considerably denser than for London as a whole (57).
- 2.6. *Age*: the area has a relatively young age structure. Lansbury and Bromley South are the two wards that make up the majority of the Leaside area; Lansbury has the highest proportion of residents aged 0-15 years old in the borough at almost 28%, with Bromley South close behind at 27%. Lansbury ward also had the lowest proportion of working age residents (16-64 years) at 65%, with Bromley South close behind at 68%.
- 2.7. *Ethnicity*: the Leaside area is home to a greater proportion of BME residents compared to Tower Hamlets as a whole, and than London as a whole; at the time of the 2011 census, 64% of residents in Lansbury and 70% in Bromley South were BME compared to 54% of residents in LBTH and 40% in London. The largest ethnic group in the area is Bangladeshi, followed by white British and white other.

Housing

- 2.8. Residents in the Leaside area are affected by many of the same housing issues prevalent in the rest of the borough including lack of affordability and overcrowding.
- 2.9. The median house price in the Leaside area has increased significantly over the last ten years; at year end March 2019 the median house price in Lansbury ward had increased from £205,000 ten years earlier to £337,500, and similar increases have taken place in Bromley South. This has contributed to high median house price to earnings ratios. In Lansbury ward the median house costs 14.8 times the median household income, and in Bromley South the multiplier is 13.4.
- 2.10. The Leaside area is also affected by issues of overcrowding. At the time of the 2011 census, residents in Lansbury and Bromley South wards were more likely to be living in overcrowded accommodation than average Tower Hamlets resident, or London resident.

Deprivation and health

- 2.11. In England, the Index of Multiple Deprivation is commonly used to measure the relative degree of deprivation in a given area. This index compiles multiple components of deprivation that are weighted with different strengths into a single score of deprivation. According to the Index of Multiple Deprivation, Tower Hamlets is the 27th most deprived local authority in England out of 317. Whilst this is a great improvement from 2015, when it was ranked as the 6th most deprived local authority, it still means that many residents of the borough are affected by multiple forms of deprivation.
- 2.12. The Leaside area sits within the 20% most deprived areas in England. However, this average disguises considerable variation in deprivation levels between neighbourhoods. For example, residents living in City Island and the surrounding wharf developments are affected by considerably less deprivation; these neighbourhoods are actually within the 50% of least deprived neighbourhoods in the country. In contrast, other neighbourhoods suffer from considerably greater deprivation.
- 2.13. In terms of health, Leaside residents tend to have poorer health and shorter life expectancies than the borough average. According to the 2011 census, more residents in Lansbury and Bromley South wards considered themselves their health to be fair, poor or very poor than for Tower Hamlets as a whole, or London as a whole. However, child obesity rates for both wards were slightly lower than the Tower Hamlets average, which could suggest that the younger generation have been less likely to suffer from poorer than average health outcomes.

2.14. Life expectancy at birth for men and women in Lansbury (77.1 for men and 81 for women) is lower than the borough average (78.8 for men and 82.8 for women) and significantly lower than the England average (79.5 for men and 83.1 for women). In contrast, life expectancy for men is higher in Bromley South at 80.3 than the borough and England averages, but the life expectancy for women is lower at 81.9.

The Historical Context

2.15. Leaside has changed vastly over the last 200 years. We can split the development over this period into four phases; initial growth, urban development, post-war reconstruction and modern renewal (the current phase).

2.16. *Initial Growth:* In the early 19th century the area was still farms and marshlands. In terms of industrial development, the East India Docks were being constructed and associated development was spreading along the East India Dock Road (the route of the A13). By the middle of the 19th century, the west of the area had urbanized and was dominated by residential development, in the form of narrow grid patterned streets that were home to small terraced houses that the dock workers resided in. The east of the area largely remained undeveloped, with a few industrial uses developing along the edge of the river.

2.17. *Urban Development:* By the beginning of the 20th century, central London had extended such that the inland areas of the AAP area were fully developed for housing. The marshy banks of the River Lea were home to less dense industrial uses. In terms of the socio-economic context, the area was dominated by working class neighbourhoods, with small pockets of slum dwellings.

2.18. *Post-War Reconstruction:* The area was significantly damaged by the bombing raids in the Second World War. Large areas were destroyed, but some areas remained intact. Huge clearance programmes of the bomb-damaged areas made way to new housing projects, many of which remain today. These included the Lansbury Estate and Chrisp Street Market, Robin Hood Gardens, the Balfron Tower and the Teviot Estate. Clearance projects also took place to deliver the Blackwall Tunnel and Langdon Park.

2.19. *Modern Renewal:* In recent years, further renewal of the area has begun to take place, with new housing developments beginning to appear in former industrial locations on the Leamouth Peninsula, and the first phases of redevelopment of the Aberfeldy and Teviot estate. These developments have tended to be of a greater density and height than was previously typical in the area.



Figure 4: Stages of growth in Leaside

The Places of Tower Hamlets

2.20. The Tower Hamlets Local Plan divides Tower Hamlets into 24 distinct ‘places’. The Poplar Riverside and Leamouth places sit within the AAP area, with the Poplar and Bromley by Bow areas on the borders of the area.



Figure 5: Places of Tower Hamlets, with the AAP area outlined in red

2.21. **Poplar Riverside:** Poplar Riverside hugs the River Lea on the eastern edge of Tower Hamlets; the DLR forms the western edge and Limehouse Cut forms its north-eastern edge. In terms of open space, the place is composed of several neighbourhood parks,

the largest of which is Langdon Park. It also has a substantial proportion of waterspace frontage, being located on Limehouse Cut to the north and the River Lea to the east.

- 2.22. Poplar Riverside is an industrial and residential area, with the industrial use predominantly to the east of the A12 and the residential use to the south and west of the area. It suffers from a substantial degree of severance due to being surrounded by Limehouse Cut to the north, the River Lea to the east, the DLR to the west and East India Dock Road to the south. It is further divided by the A12 running through the centre. The area contains two site allocations in the Tower Hamlets Local Plan, at Leven Road and Ailsa Street, both of which have recently seen planning permissions granted.
- 2.23. **Leamouth:** Leamouth is characterised by an immense amount of waterspace frontage, with the eastern edges facing the River Lea and the southern edges facing the River Thames. This led to its historical role as an industrialised area centered around shipping, with the development of Trinity Buoy Wharf and its workshop and East India Dock Basin in the early 19th century.
- 2.24. Until recently Leamouth was comprised of a series of low- to medium-rise industrial units along the Thames. However, it is now a designated tall building zone, under the Local Plan, and has seen significant new development. So far, this development has included a new mixed-use neighbourhood on City Island, and under-construction projects at Goodluck Hope and the Leamouth Road Roundabout.
- 2.25. **Bromley by Bow:** This area was historically strongly associated with its landscapes of meadows and the River Lea. At the beginning of the 19th century, the area rapidly industrialised due to its proximity to the River Lea, resulting in a landscape of terraced yellow brick houses interspersed with factories.
- 2.26. The area was bombed extensively during the second world war, resulting in the development of post-war housing states of varying densities, many of which remain today. In recent years, the area has been the focus of significant development. The most visible transformations are the higher density residential developments and tall buildings adjacent to Bromley-by-Bow station.
- 2.27. **Poplar:** In the early 19th century, the area was characterised by the several architecturally significant civic buildings – the town hall, the institute, the school and the fire station. While some of these buildings remain, the area became much more dominated by public housing from the 1950s onwards. The rapid development of public housing led to a fragmented street network and poor connectivity in the area.
- 2.28. The area remains predominantly residential, with a town centre around Chrisp Street and its daily market. The Chrisp Street area is currently undergoing comprehensive regeneration, with improvements to the public realm and new housing developments.

2.29. While significant regeneration has taken place in some parts of Poplar, just under half of Poplar is located within two conservation areas, which have seen significantly less development. Lansbury is the largest of the two conservation areas: it is composed of low-rise post-war housing, including buildings from the 1951 Festival of Britain. A smaller proportion of Poplar also falls within the Langdon Park Conservation Area.

Industrial Designations

2.30. There are also a number of industrial spaces in the core area including two Local Industrial Locations and one Strategic Industrial Location, as designated by the London Plan and the Local Plan.

2.31. A Strategic Industrial Location (SIL) is a site that plays an important sub-regional industrial, warehousing and waste management role serving not just the borough but other parts of central London. These sites should be safeguarded in accordance with London Plan policies. Empson Street is the only such site in Tower Hamlets and it sits to the north of the AAP area. While it continues to support industrial uses, it is small scale by the standards of SILs in London.

2.32. Local Industrial Locations (LILs) are areas of high accessibility that provide or could provide significant capacity for employment meeting secondary, local or specialist employment needs and to support the needs of start-ups, small-to-medium enterprises, grow-on space and creative and digital industries. Blackwall Trading Estate was designated a LIL by the latest Local Plan on the grounds that it provides the size and type of good quality medium-sized well-maintained space that is in short supply in the Borough and should be safeguarded for employment use. Gillender Street has been designated a LIL for longer. This site is divided into three, with one section redeveloped for approximately 200 residential apartments and 1,730sqm of commercial floorspace, another occupied by industrial units in the Barratt Industrial Park, and the third occupied by a vacant former warehouse building which now has permission for restoration and refurbishment for a range of employment uses.

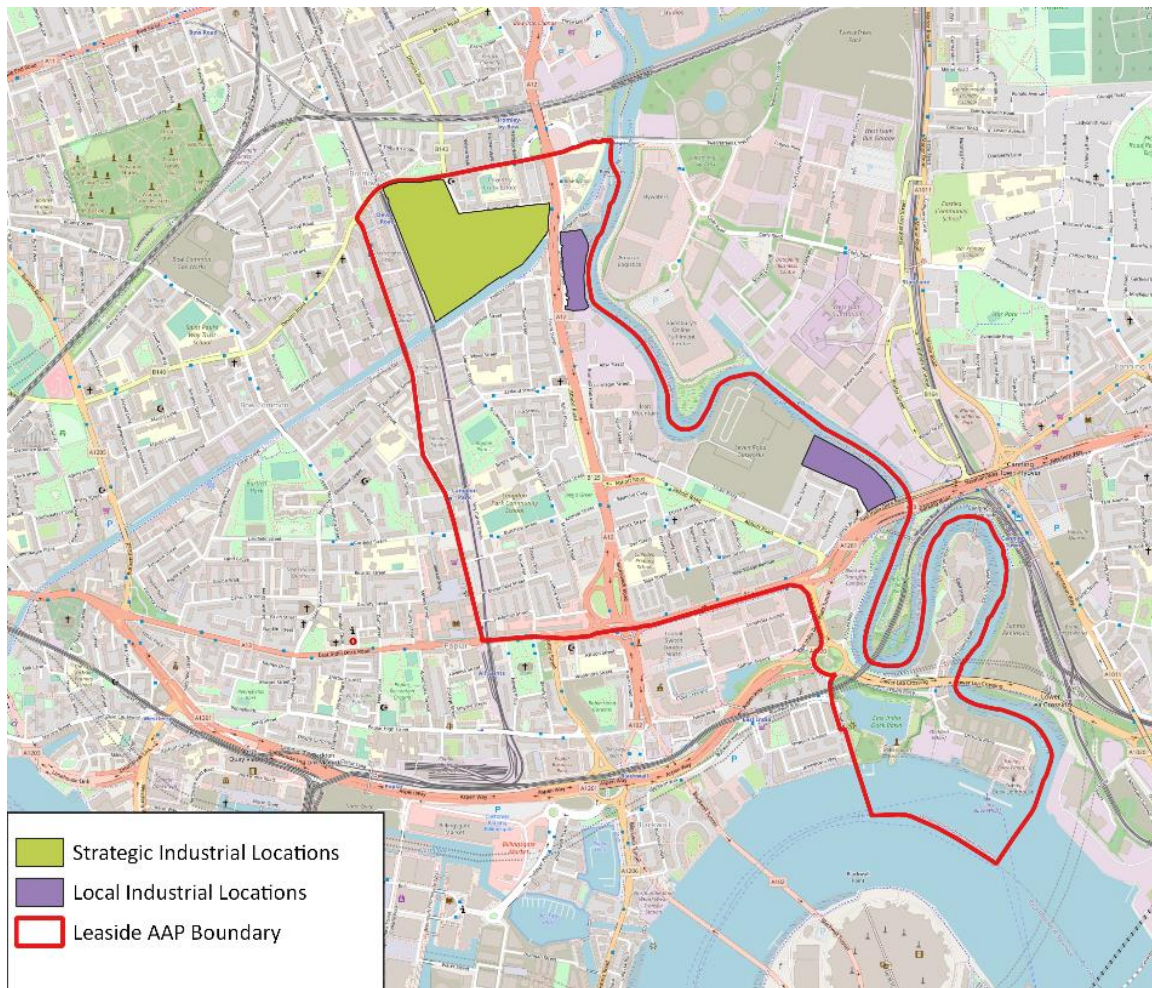


Figure 6: Industrial sites in the AAP area

Town Centres

- 2.33. Leaside is home to one district centre, three neighbourhood centres and two neighbourhood parades.
- 2.34. The Crisp Street district centre sits mostly just outside of the core area on the western boundary of the area, with the northern and eastern peripheries of the centre just entering the AAP area. District centres are meant to act as hubs, containing a wide range of shops, services and employment. The Crisp Street district centre is in good health; it has fewer vacant premises than the borough average for district centres and more premises are in retail use than the borough average. The forthcoming redevelopment of the market is expected to maintain the area's role as a district centre.
- 2.35. The three neighbourhood centres are Aberfeldy, Devons Road and London City Island. Aberfeldy and Devons Road neighbourhood centres are established and popular shopping destinations for local people. Neighbourhood centres are meant to provide a range of shops and services to meet the needs of their local catchments. The London City Island neighbourhood centre is newly designated in the Local Plan to serve the

residents of the new housing on City Island, but also includes large arts and culture uses such as the English National Ballet and London Film School.

2.36. Finally, there are two neighbourhood parades: Caspian Wharf and St Leonards. Neighbourhood parades are smaller scale than centres, with less range and diversity of uses. These parades are meant to meet the needs of their local catchments for everyday goods and services and complement the role of other centres further up the town centre hierarchy.

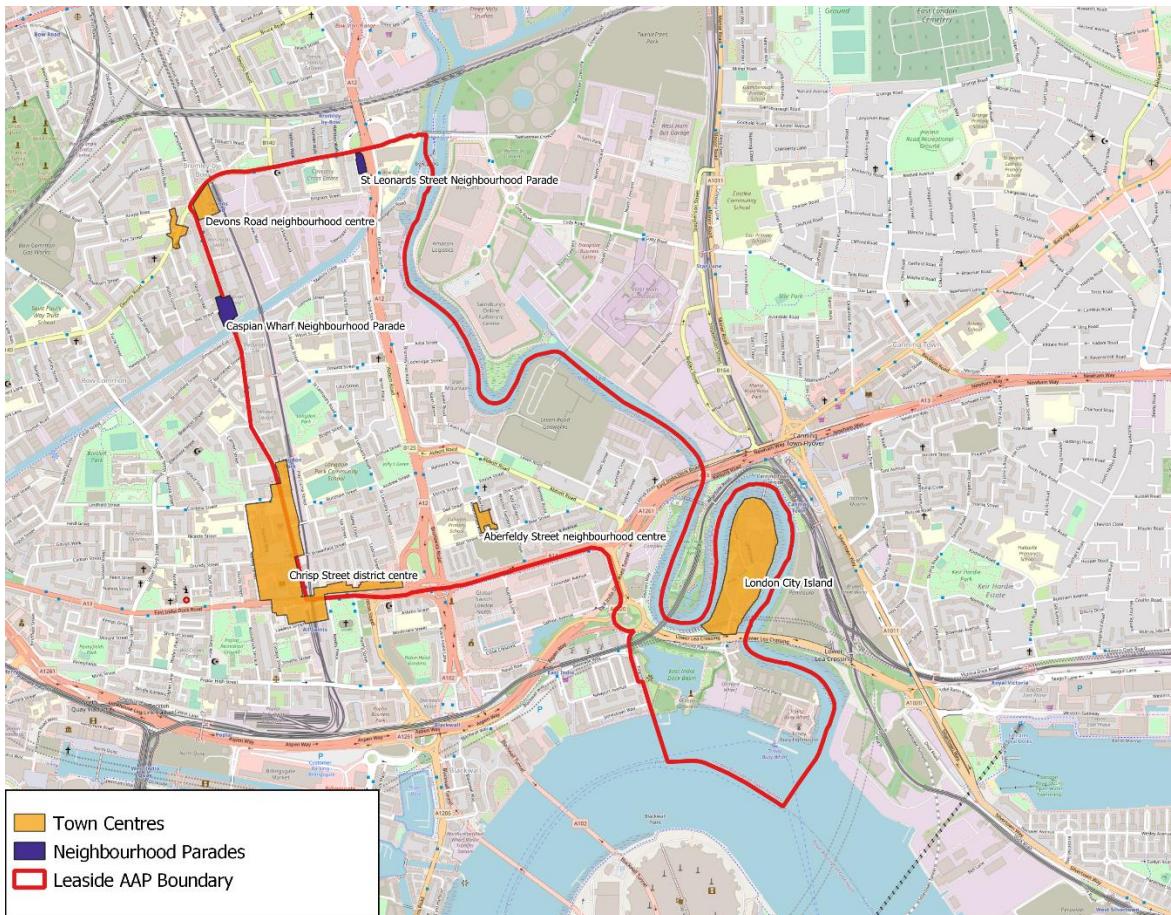


Figure 7: Town centres in the Leaside AAP area

Heritage designations

2.37. There are 15 listed buildings in the AAP area, two of which are Grade II* buildings of special interest: Balfron Tower and Bromley Hall. Balfron Tower is a high-rise block of flats and maisonettes by Erno Goldfinger, built between 1965 and 1967 and a precursor to the similarly listed Trelick Tower in west London. Bromley Hall is an early Tudor period manor house. It was originally built around 1485 and is thought to be the oldest brick house in London, although significant alterations have been made to the house since that time.

2.38. Balfron Tower is also identified as a borough-designated landmark in the Local Plan, reflecting its high architectural and cultural value. The Local Plan also recognises the contribution and prominence of the building on the skyline in two borough-designated views.

2.39. There are 58 conservation areas across Tower Hamlets and four of these sit within the AAP area²:

- The Limehouse Cut Conservation Area is focused on the Limehouse Cut canal and immediate hinterland. Included in its boundaries are important fragments of the area's historic past, such as a small remnant of the historic settlement of South Bromley along the west bank of Bow Creek and a pocket of surviving Victorian development between Limehouse Cut and Dod Street.
- The Balfron Tower Conservation Area protects the listed Balfron Tower, as well as Carradale House and other buildings in the estate of low- and high-rise scale, many of which were designed by the architect Erno Goldfinger.
- The St Frideswide's Conservation Area is a small area to the south of Balfron Tower, focused on protecting the character of the locally listed St Frideswide's Mission and its associated buildings.
- The Langdon Park Conservation Area includes Langdon Park, its primary school and a series of locally listed Georgian terraces to the south. The focal point of this area is the Grade II listed St Michael's Church and the war memorial in its court grounds.

2

https://www.towerhamlets.gov.uk/lgn/planning_and_building_control/conservation_and_urban_design/conservation_areas.aspx

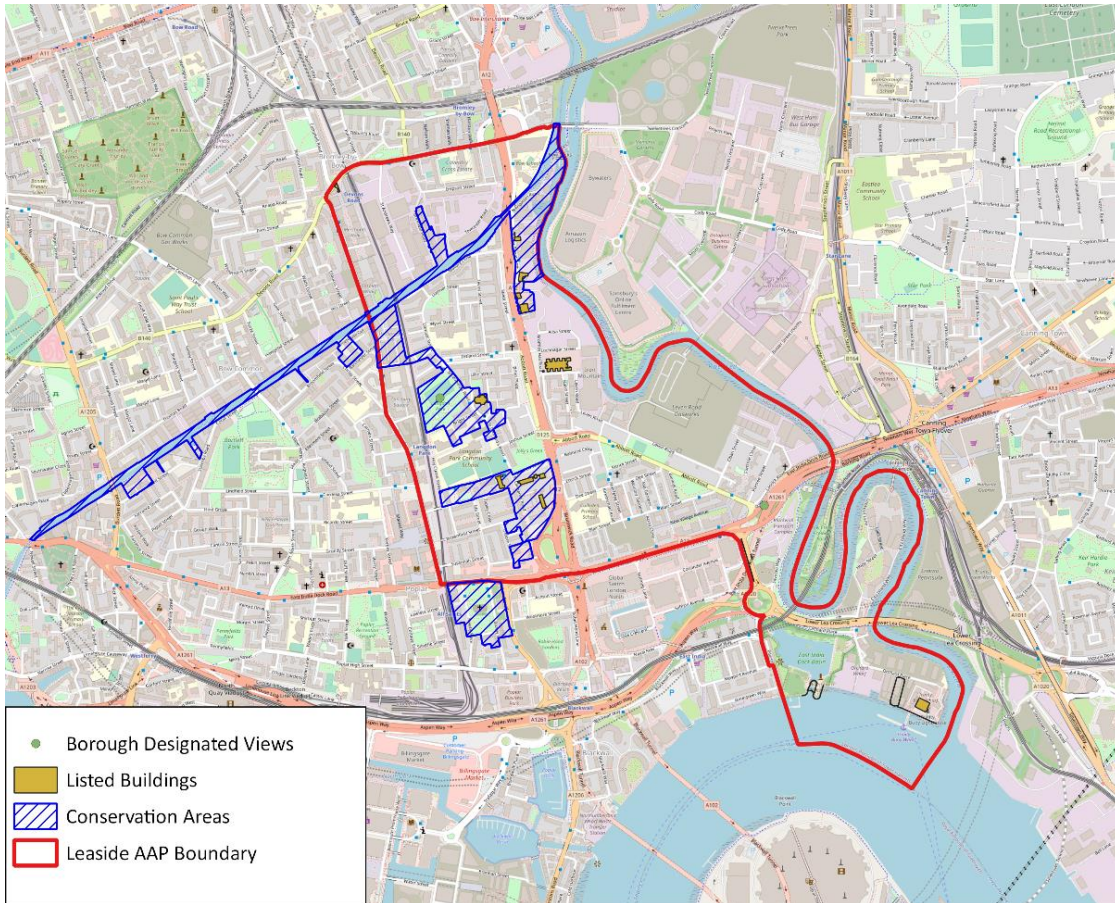


Figure 8: Heritage assets in the AAP area

Open Space

2.40. There are around 10.2ha of publicly accessible open space in the AAP area, the largest of which are Langdon Park and the East India Dock Basin. However, large sections of the AAP area are considered to be deficient in access to open space or nature. The Tower Hamlets Parks and Open Spaces Strategy³ projects that this deficiency will persist and by 2031 the level of deficiency in Lansbury ward will be moderate, meaning there will be 0.5-1.0 ha of open space per 1000 people. In Bromley South ward the future level of deficiency is expected to be high, with less than 0.5 ha of open space per 1000 people.

³ https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Open_Space_Strategy_2017.pdf

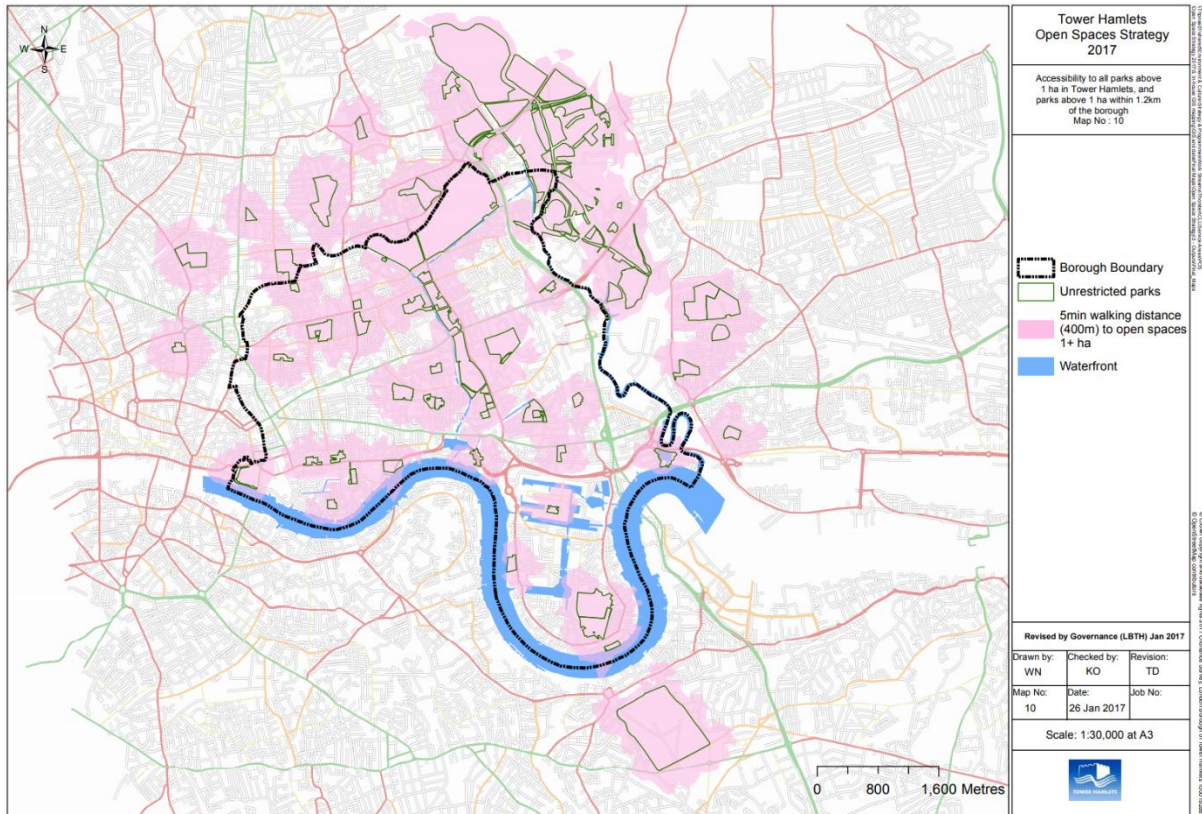


Figure 9: Areas of poor access to open space in Tower Hamlets

2.41. In terms of water spaces, the area is enclosed by the River Lea and River Thames, and Limehouse Cut canal runs through the middle. The East India Dock Basin is also an important water space, located in the south of the area. These waterways are the main source of protected biodiversity within the AAP area.

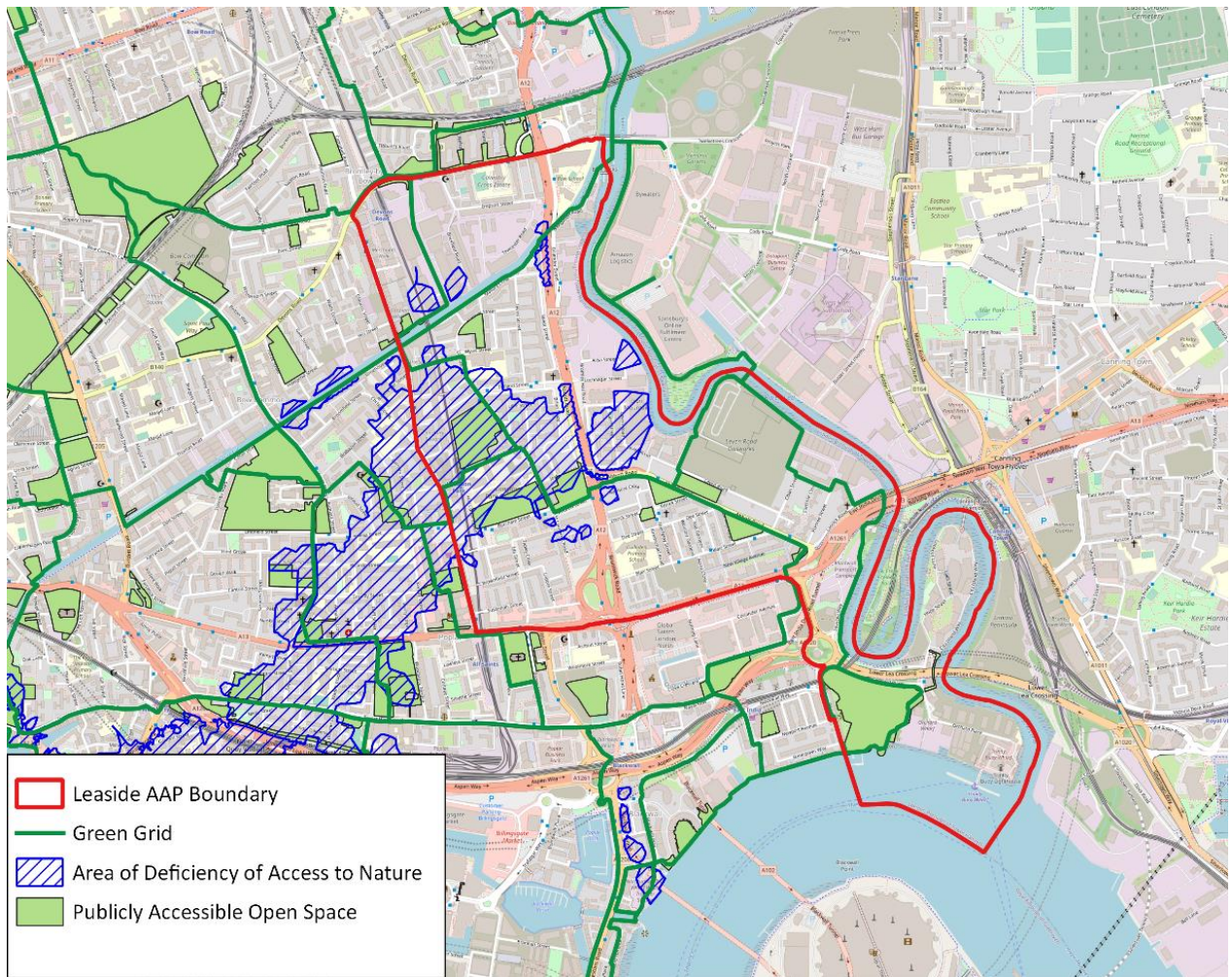


Figure 10: Green spaces and areas of deficiency of access to nature in the AAP area

Transport and connectivity

2.42. Most of the area has a public transport accessibility level (PTAL) of between 2 and 4⁴. PTAL is calculated based on how close an area is to public transport services, and how frequently those services run. There are small pockets of land close to Bromley by Bow Station, Langdon Park DLR Station and Canning Town Station where the public transport accessibility is excellent. On the other hand, the public transport accessibility is very poor around Leven Road, Ailsa Street and Orchard Place.

2.43. In the AAP area there are a number of bus routes providing services into central London, Stratford, and Canary Wharf. There are also two DLR stations - Devons Road and Langdon Park – that connect the area to the City of London and Canary Wharf. City Island is also connected to Canning Town Station via a bridge across the River Lea.

⁴ Based on the reference tool at <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

2.44. In terms of the road network, the area is very well connected. The A12 runs north-to-south through the middle of the core area and the southern border of the core area is enclosed by the A13, which runs east-to-west. The A12 leads on to the Blackwall Tunnel, which connects the road network in the east of Tower Hamlets to the Greenwich Peninsula. The air quality in the area is particularly poor adjacent to these major roads. On the A12 the NO₂ concentrations are over 60µg/m³, with a wider strip of land adjacent to the road that has NO₂ concentrations of over 40µg/m³. The land adjacent to the A13 also has NO₂ concentrations of over 40µg/m³.

2.45. The area is connected to Newham via two pedestrian bridges across the River Lea. One bridge links City Island to Canning Town station and the other links East India Dock Road to the Bow Creek Ecology Park. This is in addition to the road bridges at Twelvvetrees Crescent, the A13, and the Lower Lea Crossing.

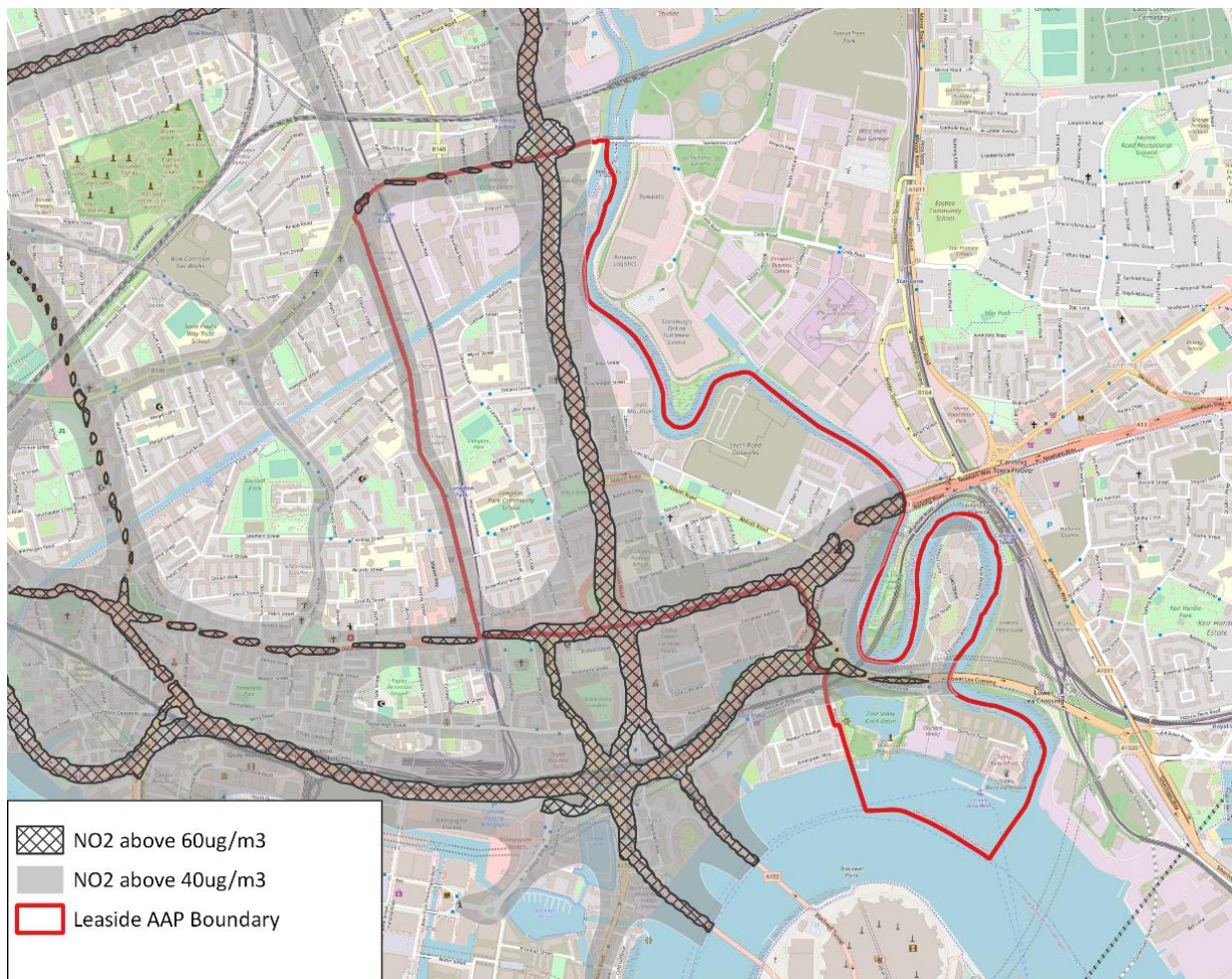


Figure 11: Areas of poor air quality in the AAP area

Challenges and Opportunities in the AAP Area

2.46. This draft of the AAP has undergone an Integrated Impact Assessment, which assesses the sustainability of the proposals in the plan. As part of this process, the Council produced a scoping report, which identified challenges in the area. These can be grouped into four major categories, as follows:

Poor accessibility and spatial severance

2.47. The area suffers from poor accessibility:

- To the east the area is cut off from London Borough of Newham by the River Lea.
- To the south, the area is cut off from Canary Wharf by the A13.
- The A12 and the DLR lines fragment the area in the west and are significant barriers to movement across the area, and towards the district centre at Chrisp Street.

2.48. This combination of physical barriers makes it hard for residents to move around the core area; residents often have to make long, convoluted journeys to reach community facilities or other neighbourhoods. In addition, these barriers cut the area off from the rest of Tower Hamlets and neighbouring Newham, meaning it is harder for residents to fully reap the benefits of living in an inner London location, such as easy access to amenities and employment opportunities. Poor legibility of the streets in the area and a lack of wayfinding signage can also make it difficult for people from outside the area to navigate their way around.

2.49. In order to reduce the impact of the surrounding roads, some of the residential estates have been designed to look inwards, creating enclosed neighbourhoods which discourage people from taking through routes. This reduces the opportunities for residents and workers from different parts of the area to meet and use shared facilities. It has also created a number of areas where low footfall has led to safety concerns, further reducing the use of those spaces.

2.50. However, if greater connectivity can be achieved in and around Leaside, then the area is well-positioned to take advantage of the opportunities presented by surrounding districts – including transport connections, community facilities, jobs, and shops in Stratford, Canary Wharf and Canning Town.

Population growth and change

2.51. The scale and pace of change in the area, in terms of residential development and population growth, is expected to be significant. The wards within the AAP area are projected to see their population rise by more than the borough average of 29% between 2015 and 2030. This level of inward investment presents significant

opportunities to create a more welcoming public realm, and address issues around connectivity and air quality. But without proactive planning and delivery of social infrastructure, this rapid growth could place pressure on existing social services and community facilities. In addition, the construction of new developments can create significant disturbance to the existing community and hence needs to be managed to try and minimise the potential negative impacts.

2.52. This area has seen changes in demographics in recent years as well, with the development of new neighbourhoods such as at London City Island. The proximity to Canary Wharf and good transport links into the City, has attracted younger professionals to the area. This type of change has the potential to impact upon the sense of the community if newer residents are not well integrated with the previous generation of residents. Evidence from the Aberfeldy Listening Campaign undertaken by Poplar HARCA in 2019 suggests the community in the AAP area is already being impacted by these changes: 46 responses (out of 412 households) commented on there being a 'lack of community'.

Access to green spaces and nature

2.53. Large swathes of the core area are currently classified as deficient in access to green space and access to nature (see figures 8 and 9). The amount of open space available per person is projected to decrease even further over the next 15 years as the population grows in the area. This poses a potentially significant problem, as access to open and green spaces contributes to physical and mental health and provides places for children to play.

2.54. However, there are some larger green and open spaces within the AAP area, particularly at Langdon Park and East India Dock Basin, and there are smaller pockets of greenery within the estates at Teviot and Aberfeldy. A new large open space is also being delivered on the Leven Road site allocation, along the River Lea. These can provide the backbone of a green network within the area as new open spaces and green connections come forward in line with the Council's Green Grid Strategy.

Environmental quality

2.55. The air quality for the AAP area is similar to the borough average, but Tower Hamlets has the fifth worst air quality of any London borough and the level of NO₂ in much of the borough exceeds National Air Quality Objective standards and World Health Organisation guideline values. The air quality is particularly poor on and adjacent to major roads in the area. The A12, A13 and Lower Lea Crossing all have NO₂ concentrations of over 60 µg/m³, with the areas directly adjacent to them having concentrations of over 40µg/m³ – above the threshold of the Air Quality Standards 2010. These levels of air pollution can have significant effects on human and plant

health, and contribute to climate change. However, the London-wide Mayor's Transport Strategy aims to increase the proportion of trips made by active or public transport to 80%, and to correspondingly reduce car traffic, and there are opportunities throughout the AAP area to contribute to this goal and improve air quality through changes in movement patterns, urban design, and an increase in greenery.

- 2.56. The overall quality of the River Lea between Tottenham Lock and Bow Lock was classified as bad in 2016. Many animals and plants struggle to survive in rivers with poor water quality, including key species for London like eels and barbels. However, there have been improvements in the chemical quality of the water in the River Lea, suggesting that action is already being taken to improve the environment around the river.

Covid-19 and Brexit

- 2.57. Covid-19 struck the UK in March 2020, when evidence gathering for the AAP was beginning. This evidence gathering process slowed down at this point and the pandemic has made it more difficult to consult, due to the limitations posed by social distancing. In addition, it has been difficult to judge how to approach AAP policy making, due to uncertainty over whether restrictions and changes to our way of living represent a 'new normal', if we will soon return to the status quo, or if we will settle somewhere in-between. At the time of writing it is too early to say how Covid-19 will affect society, the way we live, and the way we think about and design our communities in the long term. Because of this, for the purpose of this AAP, we are assuming that in the long term this experience will not fundamentally alter the trends in the property markets and in terms of population change in the area.

- 2.58. However, Covid-19 has changed many people's relationships with open space, the public realm and their homes, given the long period spent in 'lockdown' in 2020. While these issues have always been important when planning in a densely populated place like Tower Hamlets, they have become even more so now, and therefore, in drafting this AAP, we have thought more carefully about these topics in particular. One of the key themes of this document is connectivity, and particularly the vision of Leaside as a 'fifteen-minute city', with all the facilities residents need on a daily basis available within a short walk or cycle. This approach to improving connectivity was already important before the pandemic began – the impact of lockdown and the 'localisation' that it has brought with it has only heightened that importance.

- 2.59. Further uncertainty about the future is created by the longer-term impacts of Brexit. At the time of preparing this draft (February 2021) we are in the early stages of our new relationship with Europe, and many sectors of the economy are still getting to grips with the effects of new rules on trade and movement of goods and people. The government has regularly spoken about its intention to maintain good relationships

with the EU and to increase trading relationships with other parts of the world, and given London's strong economic performance within the country, we are assuming that the impact of Brexit will not fundamentally alter the dynamics of the land, housing and employment markets in the long term.

2.60. Of course, both the impacts of Covid-19 and Brexit will be closely monitored as time goes on and we will take into account any impacts that materialise between this consultation and the Regulation 19 consultation.

Drafting the AAP

2.61. The foundations for the AAP were laid by the Tower Hamlets Local Plan process. The AAP area is mostly within the Lower Lea Valley sub-area of the Local Plan (with the area around the Leamouth peninsula being part of the Isle of Dogs and South Poplar sub-area). Under the Local Plan, the Lower Lea Valley sub-area is expected to see development of at least 5,748 new homes, 8,748sqm of office space, 45,000sqm of industrial employment space, two new schools (one primary and one secondary) and a new 1.4ha open space. The Local Plan also allocates two development sites within the AAP area – at Leven Road and Ailsa Wharf.

2.62. The process of developing an AAP for the area based on these foundations began in late 2019 and continued through 2020 with vision workshops and the development of an evidence base for the policies in the AAP.

Vision workshops

2.63. In order to formulate the vision for the area, we held a workshop with residents, community groups, and businesses from the AAP area in January 2020, following internal discussions about potential directions for the vision. This was attended by representatives from Trinity Buoy Wharf, City Island Residents' Association, Poplar HARCA Estate Boards, Manorfield Primary School, Poplar HARCA/Spotlight, Neighbours in Poplar/Poplar Neighbourhood Forum, and the Parish of Poplar.

2.64. The workshop involved a group discussion of what the AAP entailed followed by an exercise where participants were asked to identify their top priorities for the AAP area. The participants wanted the area to be a place where people come together, to help overcome isolation for those of all ages, to promote mixed use communities and to deliver a walkway along the River Lea. We took on the feedback received in this workshop to formulate the draft vision for the AAP.

Spotlight Youth Consultation

- 2.65. In August 2020 we carried out a series of three consultation events with young people from the Spotlight Youth Centre. These were general discussions to understand what these young people like about their area, what they dislike and what they would want to change.
- 2.66. The main messages from this consultation were that the young people liked visiting the Spotlight Centres in the area, thought public transport was generally good (but should remain free), and appreciated open spaces. They did not tend to like the quality of the housing, the lack of recreational spaces in the area, and did not think the area was very suitable for cycling. In terms of things they would like to change the most popular answer was to have more places to spend leisure time outside of the home, such as parks, cinemas and bowling alleys.

Online consultations

- 2.67. We undertook two online consultations in late summer 2020 via the Tower Hamlets consultation portal. One of these consultations was focused on movement around the AAP area, principally by bike and on foot, and the other was focused on open space.
- 2.68. The movement consultation took place over four weeks and collected local people's ideas in relation to connectivity and movement in the area by providing an interactive map where people could 'drop a pin' on a specific place and make a comment on how they felt this place could be improved for walking and cycling. There was also an option to provide general comments on walking and cycling in the AAP area and surrounding neighbourhoods. This consultation received over 400 comments on specific places, and almost 100 general comments.
- 2.69. The open space consultation was set up as a six-week forum-style discussion, where people could respond to any of four questions on open spaces in the Leaside area and surrounding neighbourhoods, asking which open spaces they most enjoyed visiting, what facilities should be provided in open spaces, whether there were any open spaces that are particularly valuable for wildlife, and which areas suffer from a lack of open space. This consultation received a total of 41 responses.

Evidence base studies

- 2.70. The proposals in this draft AAP are supported by a wide-ranging evidence base. An extensive evidence base was developed as part of the Local Plan process, and much of this evidence remains relevant to the AAP. In addition, a number of new studies have been produced internally, or commissioned by the Council to focus on specific elements of planning in the Leaside area. These include:

- Poplar Riverside Land Audit – examining the trends in land development in the area and the constraints and opportunities for further residential and employment growth.
- Lower Lea Valley Connection and Movement Study – assessing preferred movement patterns and destinations in the area, and suggesting interventions to improve journeys by foot or cycle.
- Leaside Employment Study – looking at employment trends and demand for different kinds of workspace in the AAP area, and sets out typologies and requirements for the delivery of employment space.
- East of the Borough Retail Needs Assessment – examining the need for additional retail capacity in the area to meet expected population growth, and providing recommendations for maintaining strong and viable town centres.
- Planning and Social Cohesion Background Paper – assessing the challenges and opportunities for improving social cohesion in communities.
- East of the Borough Biodiversity Issues Paper – explaining the key biodiversity concerns for the AAP area and providing recommendations for addressing them.
- East of the Borough Transport Study – assessing the impacts of projected growth on public transport capacity.
- Site Allocations Methodology – setting out initial assessments of potential development sites within the area.
- East of the Borough Characterisation and Site Capacity Study – reviewing the character of the area and the potential for growth, and developing design guidance and indicative heights and capacity options for potential site allocations.
- Leaside AAP Integrated Impact Assessment – assessing the social, economic, and environmental impacts of the proposals in the draft AAP, and considering them in terms of their impact on health, equalities, and wildlife habitats.

2.71. All of these pieces of evidence will be available on the Council’s website. Where specific pieces of evidence, including those developed for the Local Plan or by other organisations, have been used to inform the proposals in the draft AAP, we will set that out at the beginning of each chapter.

Infrastructure

2.72. Over the next decade the area covered by the Leaside AAP will undergo substantial change, with significant levels of development and a major increase in the population. Notwithstanding the current levels of infrastructure provision, an increase in the number of residents will create an additional pressure on infrastructure. In order to ensure that there is successful place making and that development is delivered in a sustainable manner, it will be key to determine where the are existing infrastructure deficits, as well as where they are likely to be in the future.

2.73. To ease the impacts of development on the surrounding area, developers are required to pay a contribution to the Council to fund the delivery of infrastructure. An example of such is the Community Infrastructure Levy (CIL), which is a pound per square metre charge on most new developments. S106 financial contributions are paid to enable a developer to mitigate site-specific impacts. Both of these contributions can be used to deliver the infrastructure required to meet the needs of a growing population.

2.74. The Council has worked collaboratively with a number of key infrastructure stakeholders to develop an Infrastructure Delivery Plan (IDP). This document considers current levels of infrastructure provision and the likely future demand for infrastructure, based on expected population projections. The IDP also includes projects that have been identified to meet current and future infrastructure demands, and for each one details are provided on their location, funding requirements and timescales for delivery. An IDP specifically to support the Leaside AAP is currently being drafted and will be published in due course.

Consultation Questions - Context

- Has this chapter appropriately captured the context of the Leaside area? Is there anything that should be added to enhance a reader's understanding of the spatial or policy context of this plan?
- Are the boundaries of the AAP area appropriate? If they should be changed, why?

3. A Vision for Leaside

3.1. The vision for Leaside set out in this Area Action Plan builds on, and take further, the vision set out in the Local Plan. That Local Plan vision states:

By 2031, the Lower Lea Valley will experience comprehensive regeneration and redevelopment of former and underused industrial areas. Connectivity will be transformed with a series of new bridges and riverside walkways across the River Lea, and crossings along the A12 and A13, which will integrate existing and new communities in the area.

The development of the Lea River Park (including the Leaway) will provide a new strategic publicly available green space and a series of new pedestrian and cycling routes, linking the River Lea to London's wider green grid network.

Development in the area will have sufficient transport and social infrastructure to facilitate the creation of thriving mixed communities alongside vibrant neighbourhood centres. Housing provision will be accelerated through the Poplar Riverside Housing Zone and delivered alongside new local employment, enterprise and business opportunities.

3.2. The vision for the Leaside Area Action Plan builds on the approach in the Local Plan, and is based on three key themes:

- Social Cohesion
- Connectivity
- Sustainability

3.3. These three themes have emerged from the Council's understanding of the context, challenges, and opportunities that the AAP area presents, as well as a consideration of the priorities of national, regional, and local planning policy.

3.4. These three themes have been tested in early consultation events with local residents and community organisations, to better understand what our goals should be within these three themes and how we can work towards delivering those goals. The boxes below set out our proposal for how these three themes should be reflected in the development of the Leaside area.

A SOCIALLY COHESIVE LEASIDE

By 2031, the Leaside AAP area will contain a mixture of residential, employment, and retail opportunities suitable for people at all stages of life. There will have been a significant increase in the number of homes within the area, with redevelopment of industrial sites and existing housing estates creating mixed communities through providing a range of tenures and house sizes. New communal spaces will be providing opportunities for residents to come together in and around town centres. The historic industrial role of the area will have been reimaged, with support for existing businesses, and a new focus on smaller employment spaces suitable for more local people to realise their own business ideas, or for small- and medium-sized businesses from elsewhere in the borough to relocate. With a range of facilities available, the area will have the feeling of an active community throughout the day and into the evening.

A CONNECTED LEASIDE

By 2031, the Leaside AAP area will form a 'fifteen-minute city', with all the facilities residents need on a daily basis available within a short walk or cycle, and improved accessibility for all residents. Development will have opened up new bridge crossings over the River Lea, and through partnership working with Newham, improved routes will be available to access West Ham, Star Lane, and Canning Town stations. Within the AAP area, streets will be traffic-calmed and safe for people of all ages to walk and cycle, and 80% of all journeys will be taken by active travel or public transport. New connections to the River Lea and Chrisp Street Market will have been put in place, including safer crossings of the A12. Redevelopment of waterfront industrial sites will have opened up access to the River Lea, creating an almost continuous path from the Olympic Park to the mouth of the river.

A SUSTAINABLE LEASIDE

By 2031, the Leaside AAP area will be an exemplar of a sustainable neighbourhood, with improvements to the environment and to the health and enjoyment of residents. By discouraging traffic and encouraging significant amounts of new and improved greenery on new development and the further development of the green grid and blue infrastructure network, air quality will be high despite the presence of nearby major roads. Biodiversity on the River Lea and the Limehouse Cut canal will be flourishing, and the East India Dock Basin will have been desilted, further enhancing its status for nature

conservation. New development will have been designed to be as low energy as possible through design, layout and the use of technology, and the Leaside area will be a leader in the Council's ambition for a zero-carbon borough by 2050.

3.5. These three themes are a common thread throughout the rest of the draft AAP. Our proposals for development sites and planning policies aim to reflect the three themes and to direct development in a way that achieves the vision for Leaside.

Consultation Questions - Vision

- Do the themes presented in this section set out an appropriate vision for the Leaside AAP? Are there elements of the vision that should be changed? Are there any other themes that should be added to the vision?

4. Housing Delivery

- 4.1. The AAP area is expected to see significant housing growth over the next ten years, as part of the Council's goal of addressing the housing crisis and the need for greater levels of affordable housing in Tower Hamlets. It is crucial to ensure that new developments meet good urban design principles, create attractive and appealing places, and provide suitable levels of residential amenity. The proposals in this chapter set out our ideas for how to achieve this.
- 4.2. Policy LS1 sets out the Council's preferred approach for housing delivery in this area, and this is followed by a section that sets out principles for residential-led development on four key sites across the area, and a set of design and connectivity principles for each site.
- 4.3. This is followed by four policies that set out in more detail the requirements for housing delivery in the AAP area. Large parts of the AAP area consist of housing estates – notably at Aberfeldy and Teviot. The regeneration of these estates is an important element of the AAP, bringing with it the potential for additional housing and improved connectivity, additional open space, improved public realm, and invigorated town centres. It is crucial that in delivering these benefits, the importance of these estates as significant areas for affordable housing is not lost. The requirements surrounding estate regeneration are therefore addressed by Policy LS2.
- 4.4. The existing mixture of uses, built fabric, and infrastructure in the area also produces specific design conditions that need to be addressed by development. Most notable of these are the presence of two significant A roads, and the presence of a number of waterways. The A12 and A13 are busy, polluting, and difficult to cross. They are likely to remain so for the duration of the AAP, but with the long-term ambition of severely reducing car use in London, they may become quieter over time. Development will therefore need to address the continued existence of these severance barriers without turning their back on them completely. The waterways in the area, including the rivers Thames and Lea, and the Limehouse Cut canal, have the potential to be key assets for this area, and will be opened up by the provision of new crossings. Development needs to open up access to these water spaces to unlock their potential. These opportunities are addressed by policies LS3 and LS4.
- 4.5. Key pieces of evidence for this chapter include:
 - Lower Lea Valley Connection and Movement Study (2020)
 - East of the Borough Characterisation and Site Capacity Study (2020)
 - Leaside Infrastructure Delivery Plan (2020)
 - Poplar Riverside Land Audit (2020)

- High Density Living Supplementary Planning Document (2020)
- Green Grid Strategy Update (2017)
- Urban Structure and Characterisation Study (2009) and Addendum (2016)
- Conservation Area Character Appraisals: Balfour Tower (2007), St Frideswide's (2007), Langdon Park (2009), Limehouse Cut (2011)

POLICY LS1 – LEASIDE HOUSING DELIVERY

A – The Council will seek the delivery of a significant quantum of new homes in the AAP area. This will be achieved by working with developers and landowners to bring forward applications for:

- i) Estate regeneration projects at Aberfeldy and Teviot;
- ii) The sensitive redevelopment of local industrial locations to support residential uses in combination with continued industrial uses;
- iii) Applications for development on brownfield land.

Explanation

- 4.6. The AAP area is a key focus for regeneration and housing delivery within Tower Hamlets. The Council has a vision of transforming this area – from a relatively isolated section of the borough where large industrial sites are segregated from low-density housing estates, to an area where work, retail, and leisure opportunities are integrated with new and established communities living side-by-side. The transformation will be led by new residential development, which can be the driver for the redevelopment of town centres and industrial sites, and the delivery of the necessary infrastructure to support residents at all stages of life.
- 4.7. The London Plan has an expectation that the Poplar Riverside Opportunity Area will deliver 9,000 new homes by 2041. The Council believes that this is an appropriate target for the area, and will help to ensure that Tower Hamlets continues to deliver enough housing to meet the needs of its residents. The Opportunity Area includes parts of Newham as well, but the Council believes that it is appropriate for most of these homes to be delivered on the Tower Hamlets side of the River Lea. This is because the Newham side of the Opportunity Area largely consists of a well-used Strategic Industrial Location, where significant residential development is difficult to bring forward.
- 4.8. Delivery of additional housing in this area can also help the Council to address the housing shortfall identified in the Tower Hamlets Local Plan 2031. The Local Plan identified the whole Lower Lea Valley sub-area as capable of delivering 5,748 new homes. However, the plan’s housing trajectory also identified a shortfall of 4,076 homes from the borough’s overall housing target. By enabling the delivery of additional housing within the AAP area, the Council can go a significant way towards meeting that shortfall.
- 4.9. This policy therefore sets out an expectation of how these new homes are expected to be delivered in the Leaside area. The East of the Borough Characterisation and Site Capacity Study identified the capacity for growth across the AAP area, based on an understanding of the context and character of the area. The findings of this study are

shown in figure 11 below, along a spectrum from 'reinforce' to 'reimagine'. This identifies the possibilities for a re-imagination of place and the creation of new communities along the industrial River Lea border of the area; and the possibilities for significant but sensitive redevelopment in the Aberfeldy and Teviot estates. In other parts of the area, development is still possible, but is less likely to involve comprehensive changes and should look to reinforce existing patterns of development.

4.10. In the second consultation on this Area Action Plan (known as the Regulation 19 consultation), the plan will present a fuller trajectory for the number of homes expected to be built in the area up to 2031. As of November 2020, there are 5,024 permitted homes awaiting construction within the AAP area. The Area Characterisation and Site Capacity Study looked at five further sites with some potential for development, and identified a possibility of 3,877 homes being delivered on those sites. Four of these sites have been included as potential site allocations in this Regulation 18 draft, at a potential total of 3,467 new homes. The capacities assessed in the Area Characterisation and Site Capacity Study provide a starting point for consideration, and will be refined as work continues on the Area Action Plan and in response to consultation responses on the design, connectivity, and delivery principles for the site allocations.

4.11. Further work is also being undertaken with the GLA on possibilities for industrial intensification in the area, including the possibility of co-locating homes with employment uses on some designated industrial sites. Issues relating to the intensification of industrial floorspace are discussed in the employment chapter of this plan, and more refined work on potential housing capacities on industrial sites will be presented in the Regulation 19 draft.

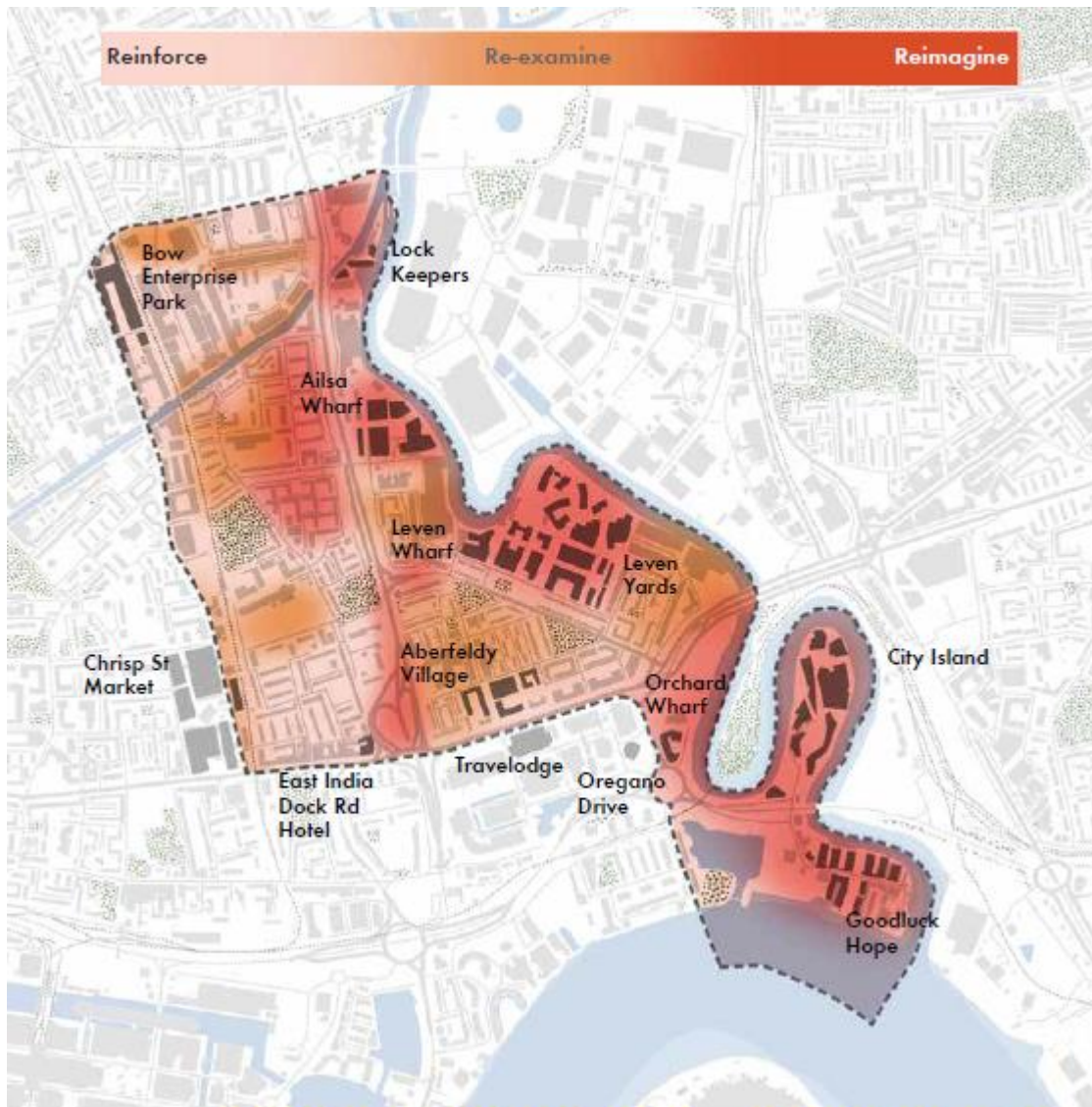


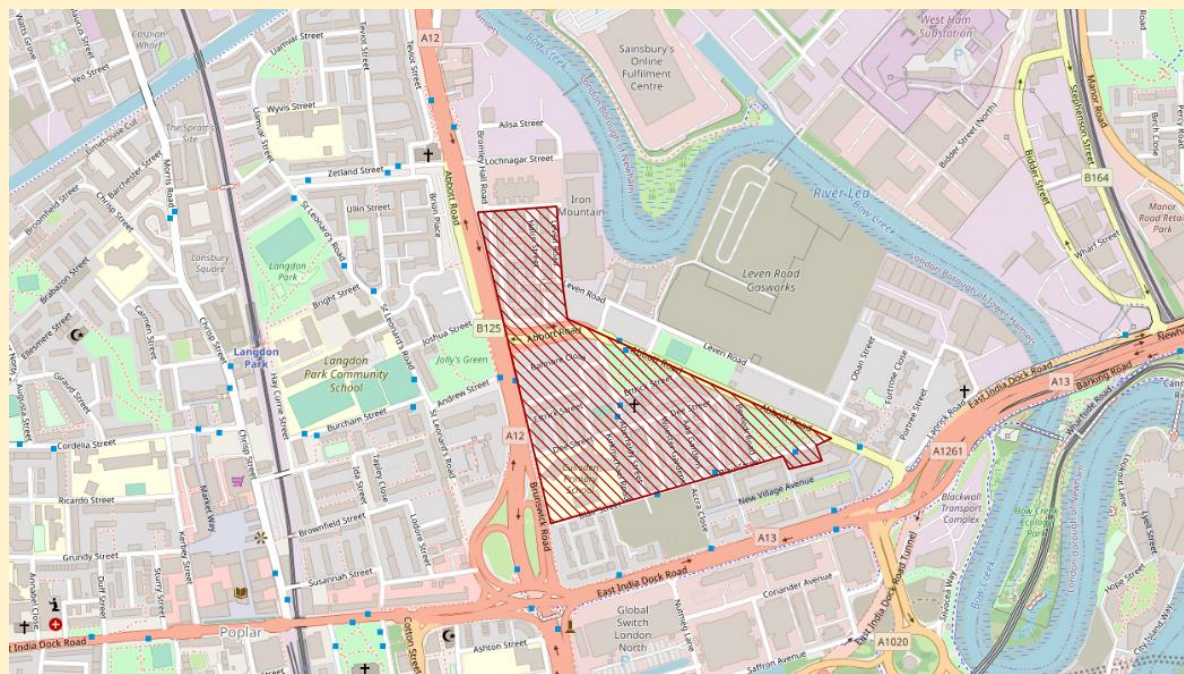
Figure 12: Capacity for growth across the AAP area (taken from the East of the Borough Characterisation and Site Capacity Study [2020])

4.12. The Council will enable development through:

- Working with landowners and developers to support suitable applications for planning permission.
- Identifying and securing the necessary infrastructure to support the proposed level of development.
- Delivering development on Council-owned sites where possible.
- Providing site allocation details through the Area Action Plan, and additional delivery details through supplementary planning documents such as the Tall Buildings SPD, High Density Living SPD, and the Reuse, Recycling and Waste SPD.

SITE LS-A – ABERFELDY ESTATE

The Council encourages proposals for the residential-led redevelopment of this site, where they meet the design, connectivity, infrastructure and delivery criteria set out below, as well as being in accordance with other development plan policies.



Size	19 ha
PTAL	2-4
Local Plan Designations	<p>Borough-Designated View: From East India Dock Road, viewing across the area to Balfron Tower with Canary Wharf in the background; and from Langdon Park towards Balfron Tower with Canary Wharf in the backdrop</p> <p>London Cycle Network: along Abbott Road</p> <p>Town Centre: Aberfeldy Neighbourhood Centre</p> <p>Publicly Accessible Open Space: Aberfeldy Playground, Millennium Green, Leven Road Park, Braithewaite Park</p> <p>Green Grid: along Abbott Road, Aberfeldy Street and Blair Street</p> <p>Area of Deficiency of Access to Nature: around Nairn Street</p> <p>Flooding: Flood Risk Area, Flood Zone 3a, Critical Drainage Area</p> <p>Area of Substandard Air Quality: the western, northern, and southern parts of the site</p>
Suitable Land Uses	Residential

	Community (community centre, worship, health, education) Retail and other town centre uses Public open space
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Context

Outline permission (PA/11/03548) was granted in mid-2012 for a phased redevelopment of parts of the Aberfeldy estate, which lies between the A12, A13, and Abbott Road. The first three phases are expected to be complete in early 2021, providing a total of 901 homes. The remaining phases were expected to deliver an additional 275 homes and the regeneration of the Aberfeldy neighbourhood centre, but it is recognised that may be an opportunity to sustainably increase the density of the remaining three phases and to bring in additional land around Nairn Street in the north to provide further homes. A ballot on the redevelopment of part of the estate was held in October 2020, but did not provide any details on the potential capacity of the site.

Design and Layout Principles

- Redevelopment should be based around a connected, grid-like street network, with buildings that provide active frontages and active and passive surveillance onto streets.
- Development of the site should positively address the A12 edge. This should include improvement of the public realm in this area to create walkable, welcoming connections between the A12 pedestrian route and the estate. The scale of development along the A12 edge should vary, to avoid a feeling that the estate is presenting a ‘wall’ to the road and turning inwards. Opportunities to address air quality and noise problems caused by the A12 through the use of green infrastructure such as hedge or tree planting should be explored.
- Key community uses should be located on Aberfeldy Street, creating the feeling of the high street as a hub of different kinds of activity.
- This site is not within a Tall Buildings Zone. Proposals for tall buildings (exceeding 30m in height, or more than twice the height of prevailing buildings) will need to satisfy the requirements of Local Plan Policy D.DH6. Tall building proposals outside of Tall Building Zones must improve the legibility of the area by marking significant locations, and avoid undermining existing landmark buildings. Further guidance on potential locations, building form and height of tall buildings will be provided in the Tall Buildings Supplementary Planning Document which is currently being prepared by the Council.
- The location of tall buildings within the site must not undermine the setting of, and views towards, Balfron Tower. Balfron Tower is a Grade II* listed building and a borough-designated landmark with a very prominent role in the local area. The sculptural quality of Balfron Tower is emphasised by the space within which it stands and its singular appearance in the surrounding townscape, and this feeling of separateness must be retained by any new development. The striking and

distinctive silhouette of the tower, and its separate service tower, is clear from the borough-designated view from East India Dock Road where it crosses over the River Lea and also from Langdon Park to the west of the A12. The prominence of Balfron Tower should be preserved from these viewpoints. Any tall buildings in these views must be subservient to Balfron Tower and be located so that they do not disrupt the silhouette of the building on the skyline.

- Although not listed, St Nicholas' Church is a significant local landmark that provides a link to the area's Festival of Britain heritage, and should be retained.
- Biodiversity enhancements (in line with the AAP's Urban Greening Factor policy) should be particularly focused on in the area around Nairn Street, due to its status as an Area of Deficiency in Access to Nature.

Connectivity Improvements

- Redevelopment of the area should be based on low traffic neighbourhood principles, with limited opportunities for motorised vehicles to 'rat-run' or take shortcuts through the site. Streets should be designed with priority given to pedestrians and cyclists, with motorised vehicles treated as guests rather than owners of the space. Consideration should be given to the potential for shared surfaces on some streets.
- A key potential site for improved connectivity is through the provision of a new crossing of the A12 at the top of Abbott Road that can provide the opportunity for onward connections to Chrisp Street and Langdon Park DLR station. This could be through an at-grade crossing or the repurposing of the existing vehicle subway underneath the A12 for the exclusive use of pedestrians. In all cases, it should include a reclamation of road space to provide attractive public realm and linkages to the open space of Jolly's Green on the west side of the A12. Discussions with Transport for London will be vital to securing this improvement.
- Blair Street should act as a key, traffic-calmed east-west route for pedestrians and cyclists through the installation of dedicated cycle provision, the reduction or removal of on-street parking, and the installation of continuous pedestrian crossings on side streets.
- Traffic-calming measures should be installed on Abbott Road, including two-way cycle provision and continuous pedestrian crossings on side streets. Toucan crossings should be installed at the intersections with Blair Street, Dee Street, and Aberfeldy Street.
- Consideration should be given to how development connects to the earlier phases of the Aberfeldy development, providing a walking and cycling connection from Aberfeldy Street to the A13 and onward to East India DLR station.

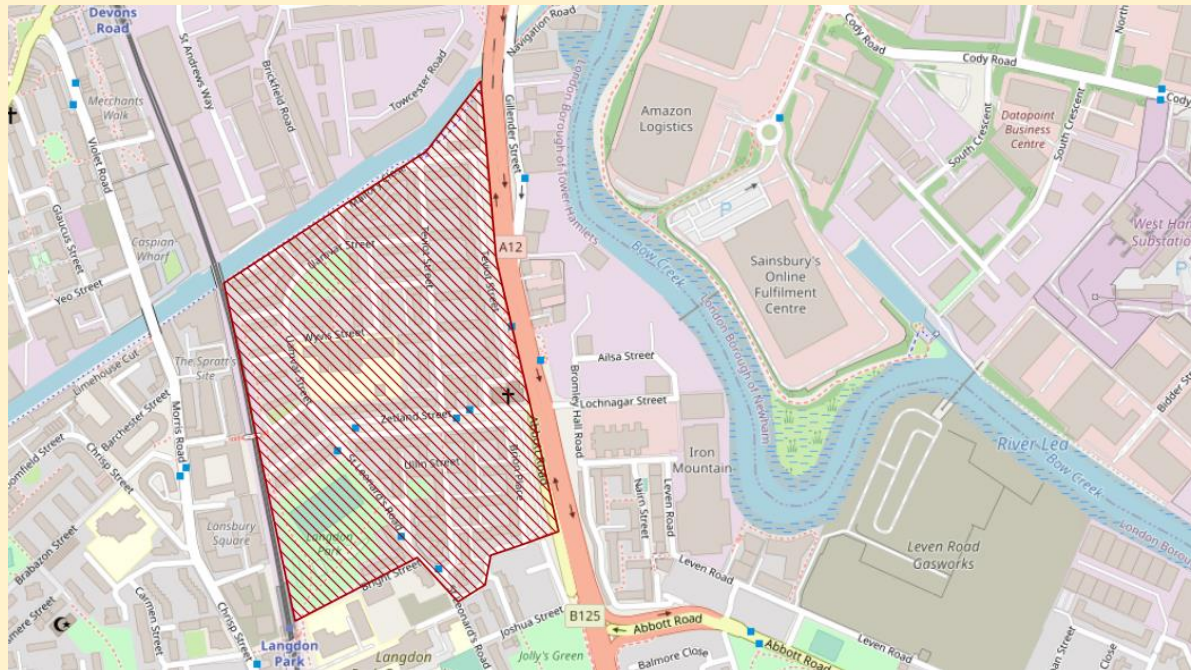
Infrastructure and Delivery

- Delivery of a new crossing of the A12 at the top of Abbott Road will help to address the significant connectivity problems of this area.

- Additional public open space is needed throughout the AAP area, especially as the population grows. Proposals for this site should look to provide expansions to existing open spaces or provide a significant new open space.
- Existing community facilities in the estate should be reprovided – including the mosque and primary school, with the health centre and community centre on this site understood to be relocating to an earlier phase of the estate regeneration upon completion.
- Space should be safeguarded for a potential expansion of the primary school on this site; or the potential provision of a public sports hall. If the primary school is moved to a new location within the site, it must retain capacity for at least the same number of pupils that currently attend the school, including the same capacity of play space.
- Delivery should be phased so that a revitalised town centre is delivered within the first phase of the programme, to avoid uncertainty for retailers over the status of the centre and to ensure the new centre is embedded in the community as increasing numbers of new residents come to live in the surrounding area. The delivery of a new town centre should be consistent with the improvement identified in Policy LS13. The delivery of infrastructure benefits should be phased throughout the delivery programme, rather than being concentrated towards the later phases.
- The site lies within an area of significant flood risk and is a critical drainage area, and surface materials and landscaping should be designed to reduce the risk of flooding as effectively as possible. A flood risk assessment will be required as part of any proposal.
- To reduce potable water demand, applications for development on this site should examine the possibility of installing dual plumbing systems to allow recycling of greywater and rainwater for non-potable uses.

SITE LS-B – TEVIOT ESTATE

The Council encourages proposals for the residential-led redevelopment of this site, where they meet the design, connectivity, infrastructure and delivery criteria set out below, as well as being in accordance with other development plan policies.



Size	16 ha
PTAL	2-3
Local Plan Designations	<p>Borough Designated View: From Langdon Park towards Balfron Tower with Canary Wharf in the backdrop</p> <p>Conservation Areas: Langdon Park, Limehouse Cut</p> <p>Listed Buildings: Church of St Michael and All Angels, Grade II</p> <p>Publicly Accessible Open Space: Langdon Park, Wyvis Street</p> <p>Metropolitan Open Land: Lee Valley Regional Park (along the Limehouse Cut towpath)</p> <p>Green Grid: Along Zetland Street, St Leonard's Road, and Limehouse Cut towpath</p> <p>Area of Deficiency of Access to Nature: south of Zetland Street</p> <p>Flooding: Floor Risk Area (whole site), Flood Zone 2 (east of Teviot Street and Spey Street)</p> <p>Area of Substandard Air Quality: East of Teviot Street and Spey Street</p>
Suitable Land Uses	Residential

	Small-scale retail Community (community centre, worship, education) Public open space
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Context

A ballot on the redevelopment of parts of the Teviot estate was held in Spring 2019, proposing between 1,800 and 2,450 new homes on the site, depending on the exact parameters used. However, the higher end of this range was predicated upon building on the existing site of Langdon Park, and providing a new park further in the interior of the estate, a suggestion the Council does not support.

Design and Layout Principles

- Redevelopment should be based around a connected, grid-like street network, with buildings that provide active frontages and active and passive surveillance onto streets.
- Development of the site should positively address the A12 edge. This should include improvement of the public realm and appropriately landscaped buffers in this area to create walkable, welcoming connections and increased permeability between the A12 pedestrian route and the estate. The scale of development along the A12 edge should vary, to avoid a feeling that the estate is presenting a ‘wall’ to the road and turning inwards. Opportunities to address air quality and noise problems caused by the A12 through the use of green infrastructure such as hedge or tree planting should be explored.
- Development around Langdon Park should provide a strong frontage onto the park, with opportunities for active and passive surveillance.
- Historical assets along St Leonards Road should be protected and enhanced through appropriately scaled and sensitively designed neighbours. This includes the Grade II listed Church of St Michael and All Angels, and the row of historic buildings between Chadbourn Street and Clutton Street.
- Community and retail uses can most usefully be focused near the entrance to Langdon Park DLR station and along Zetland Street. Zetland Street can act as a point of connection east-west across the estate and to the neighbourhoods and transport options beyond in both directions. With the creation of a safe and direct east-west route from the proposed Lochnagar bridge to Langdon Park DLR station, Zetland Street is likely to receive greater footfall which can benefit local businesses. By moving these uses to Zetland Street, direct access is also provided from the existing bus route.
- This site is not within a Tall Buildings Zone. Proposals for tall buildings (exceeding 30m in height, or more than twice the height of prevailing buildings) will need to satisfy the requirements of Local Plan Policy D.DH6. Tall building proposals outside of Tall Building Zones must improve the legibility of the area by marking significant locations, and avoid undermining existing landmark buildings. Further guidance on potential locations, building form and height of tall buildings will be provided in

the Tall Buildings Supplementary Planning Document which is currently being prepared by the Council.

Connectivity Improvements

- A simpler and clearer street network should be a priority of development on this site, to provide more connections to locations within and beyond the site. This should include greater permeability between St Leonards Road and Zetland Street.
- Redevelopment of the area should be based on low traffic neighbourhood principles, with limited opportunities for motorised vehicles to 'rat-run' or take shortcuts through the site. Streets should be designed with priority given to pedestrians and cyclists, with motorised vehicles treated as guests rather than owners of the space.
- This should include an exploration of the possibility of closing the slip road from the A12 onto Teviot Street to improve public realm and pedestrian access in this area, as well as improving walking and cycling connections along Teviot Street. This will require access to be maintained to the Poplar Works employment hub without unduly impacting on the road network elsewhere in the estate.
- Development on the estate should contribute to improvements to the junction between the A12, Zetland Street, and Lochnagar Street, including signalisation of the junction, tightened turning radii and lane widths, and more direct pedestrian crossings. This should also carefully consider how Zetland Street connects to the underpass from Abbott Road, especially if this underpass is pedestrianised.
- Segregated cycle lanes and improved footways with continuous crossings should be provided along Zetland Street and St Leonards Road, connecting to an improved cycling and walking route through Langdon Park and beyond to Crisp Street and Morris Road.
- If possible, development should explore opportunities to extend green grid access through a new pedestrian and cycle crossing of the Limehouse Cut from St Andrew's Way to Brushwood Close, in combination with site allocation LS-E.
- Improved lighting should be delivered along the route to the DLR crossing at Clutton Street, and along the Limehouse Cut canal. Lighting along the canal should be sensitive to any ecology/biodiversity considerations. The view between the canal and the neighbourhood should be protected at the junction of Mallory Close and Teviot Street.

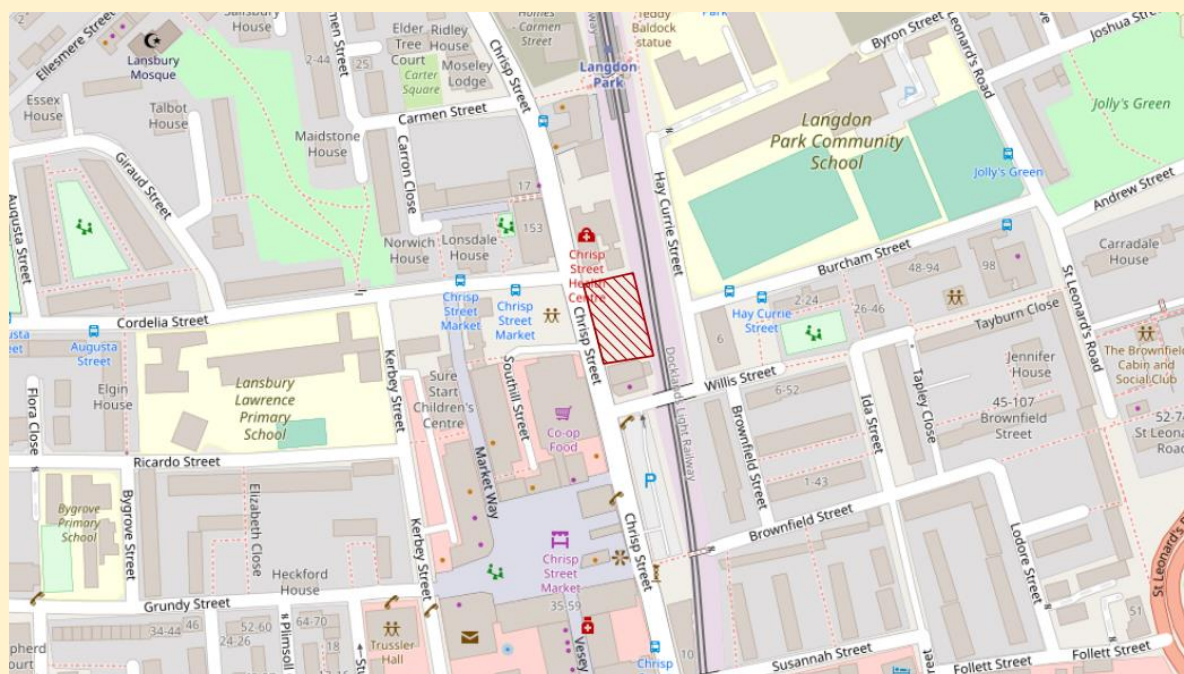
Infrastructure and Delivery

- Additional public open space is needed throughout the AAP area, especially as the population grows. Opportunities should be explored to expand and enhance the two open spaces within the estate, at Langdon Park and Wyvis Street. It will not be acceptable for new homes to be delivered on the current location of Langdon Park.
- Existing community facilities in the estate should be protected or reprovided, including the community centre, primary school, and places of worship.

- Space should be safeguarded for a potential expansion of the primary school on this site; or the potential provision of a public sports hall.
- The site lies within an area of significant flood risk, and surface materials and landscaping should be designed to reduce the risk of flooding as effectively as possible. A flood risk assessment will be required as part of any proposal.
- To reduce potable water demand, applications for development on this site should examine the possibility of installing dual plumbing systems to allow recycling of greywater and rainwater for non-potable uses.

SITE LS-C – 72-90 CHRISP STREET

The Council encourages proposals for the residential-led redevelopment of this site, where they meet the design, connectivity, infrastructure and delivery criteria set out below, as well as being in accordance with other development plan policies.



Size	0.1 ha
PTAL	4
Local Plan Designations	<p>Borough-Designated View: From Langdon park towards Balfron Tower with Canary Wharf in the backdrop, which passes across this area</p> <p>London Cycle Network: along Crisp Street</p> <p>Town Centre: Crisp Street District Centre</p> <p>Area of Deficiency of Access to Nature: Whole site</p> <p>Flooding: Flood Risk Area, Flood Zone 2</p> <p>Area of Substandard Air Quality: Whole site</p>
Suitable Land Uses	<p>Residential</p> <p>Retail or community uses</p>

Context

This site is currently used as storage for the adjacent Crisp Street Market. However, with the regeneration of the market, there is an opportunity for this site to be redeveloped for housing and community uses. This would provide a much more suitable street frontage for this edge-of-town-centre site, rather than the current unappealing, walled-off site. To the south and north of the market storage sites are a small collection of retail units and a health centre, respectively.

Design and Layout Principles

- Development on this site should provide a strong, active frontage to Chrisp Street and make a positive contribution to the district centre designation. Access to the community and/or retail uses should be from Chrisp Street.
- This site is not within a Tall Buildings Zone. Proposals for tall buildings (exceeding 30m in height, or more than twice the height of prevailing buildings) will need to satisfy the requirements of Local Plan Policy D.DH6. Development on this site should step down in height from the tall building at Langdon Park DLR station and those proposed at the Chrisp Street Market redevelopment. Consideration should be given to the impact of development on this site on the view towards Canary Wharf in the borough-designated view from Langdon Park. Further guidance on building form and height will be provided in the Tall Buildings Supplementary Planning Document which is currently being prepared by the Council.
- Design and layout should ensure that residential amenity is protected against noise impacts from the DLR tracks, and air quality impacts from Chrisp Street.

Connectivity Improvements

- As part of the delivery of this site, contributions should be made to improvements to Chrisp Street for walking and cycling, which could include dedicated cycle provision and safer crossing points. This should feed into a wider approach to improvements and traffic-calming along Chrisp Street.

Infrastructure and Delivery

- This site will likely only be suitable for delivery if coordination can be achieved to combine the Council-owned market storage site with the retail units directly to the south and the health centre to the north, to provide a more comprehensive redevelopment. If the health centre site is included in redevelopment, the health centre should be reprovided on-site.
- Proposals for this site should aim to provide a minimum of 50% affordable housing on publicly-owned parts of the site.
- The site would be suitable for community uses that could complement the district centre designation and benefit new and existing residents, including early years childcare.
- Confirmation should be gained before development begins that market storage is no longer needed or that an alternative storage location has been secured. Otherwise, options for providing market storage, perhaps at an underground level, should be explored.
- The site lies within an area of significant flood risk, and while residential uses are expected to be located above the ground floor, surface materials and design and landscaping should be designed to reduce the risk of flooding as effectively as possible. A flood risk assessment will be required as part of any proposal.

SITE LS-D – ORCHARD WHARF

The Council encourages proposals for the redevelopment of this site, including some residential elements, where they meet the design, connectivity, infrastructure and delivery criteria set out below, as well as being in accordance with other development plan policies.



Size	1.4 ha
PTAL	1b
Local Plan Designations	Tall Buildings Zone: Leamouth Safeguarded Wharf: Orchard Wharf Green Grid: Along Orchard Place Flooding: Flood Risk Area, Flood Zone 3a Water Space: Thames Policy Area
Suitable Land Uses	Safeguarded wharf use Residential Retail or community uses

Context

Orchard Wharf is a safeguarded wharf under the Local Plan and London Plan – meaning that although the site is not currently in use, the ability to accommodate wharf uses must be protected in any redevelopment. At the same time, the site sits in an increasingly attractive location, with a Thameside location, and new housing developments to the east (Goodluck Hope) and north (London City Island). To the west is East India Dock basin, the southernmost point of the Lee Valley Regional Park, which provides an appealing amenity

space for new residents – but will also require sensitive treatment from a new neighbour, and efforts may be required to mitigate the impact of additional visitors.

Design and Layout Principles

- Development should make a positive contribution to the riverfront, given its high level of visibility on the bend in the River Thames.
- The site is within a Tall Buildings Zone, and tall buildings are, in principle, acceptable in this location. The height of buildings should step down towards the edge of the zone to ensure that the cluster retains its own identity and does not merge with the Blackwall Tall Buildings Zone to the west. Building height and form should vary to create a dynamic and harmonious skyline composition that allows views between the buildings, retains views to the river from within the cluster and presents a positive impression in its prominent location on the riverfront. Tall buildings will need to satisfy the requirements of Local Plan Policy D.DH6. Further guidance on potential locations, building form and height of tall buildings will be provided in the Tall Buildings Supplementary Planning Document which is currently being prepared by the Council.
- Opportunities for permeability through and around the site should be sought, where this is compatible with the wharf use.
- Development should respond to the adjacent Goodluck Hope development in terms of scale and design. This could include taking inspiration from the area's industrial history, such as the use of brick materials and pitch roofs where appropriate.
- Development should provide an active frontage to the north onto Orchard Place. This could be achieved by placing any retail or community uses in this location, or by locating wharf offices and residential access points on this street.
- Surveillance onto East India Dock Basin should be provided, for example by orienting some habitable rooms and balconies to the west to overlook the site.

Connectivity Improvements

- Where possible, public access to the Thames riverfront and views across the Thames should be provided. Direct access to the riverfront may be prohibited by the need for access to the wharf use – in this case, proposals should consider alternative approaches to ensuring public views of the river, including providing public access across any podium that may be delivered.
- Additional connectivity and visual links from Orchard Place to East India Dock Basin should be provided as part of development, with well-designed public realm along the route.
- Development should contribute to the improvement of the public realm along Orchard Place, which may include contributions to improving the pavement and road surfaces, and the implementation of traffic calming measures along the road, and the addition of green features such as trees or planters in line with the Green Grid Strategy.

Infrastructure and Delivery

- Orchard Wharf is safeguarded, and a viable wharf use must be delivered as part of any proposal on this site. Delivery of housing on this site is only suitable where a viable wharf use is also being delivered and where the delivery of housing will not prejudice the operation of any potential wharf use. The viability of the wharf use will need to be robustly demonstrated in any planning application, and is subject to consultation with the Port of London Authority and the Greater London Assembly. The wharf facility should be able to be utilised for a range of industrial uses, and proposals should demonstrate the potential capacity of potential wharf uses.
- Development should contribute through S106 agreements or CIL payments to mitigating any impacts upon and improving the ecology and biodiversity of the East India Dock Basin, including improvement works to permanently de-silt the basin. Proposals will need to assess the potential quantity and impact of additional visitors to the Site of Importance for Nature Conservation, and, if necessary, demonstrate suitable mitigation measures. Improvements could also include tree planting and seating.
- The site may be suitable for some smaller community or retail uses that could benefit residents of this and surrounding developments. This will be subject to the need to deliver a viable wharf use.
- The site lies within an area of significant flood risk, and while residential uses are expected to be located well above the ground floor, surface materials and design and landscaping should be designed to reduce the risk of flooding as effectively as possible. A flood risk assessment will be required as part of any proposal. Applications for development on this site should consider options for safe surface water discharge into surrounding bodies of water, to reduce the amount of surface water entering the sewer system.

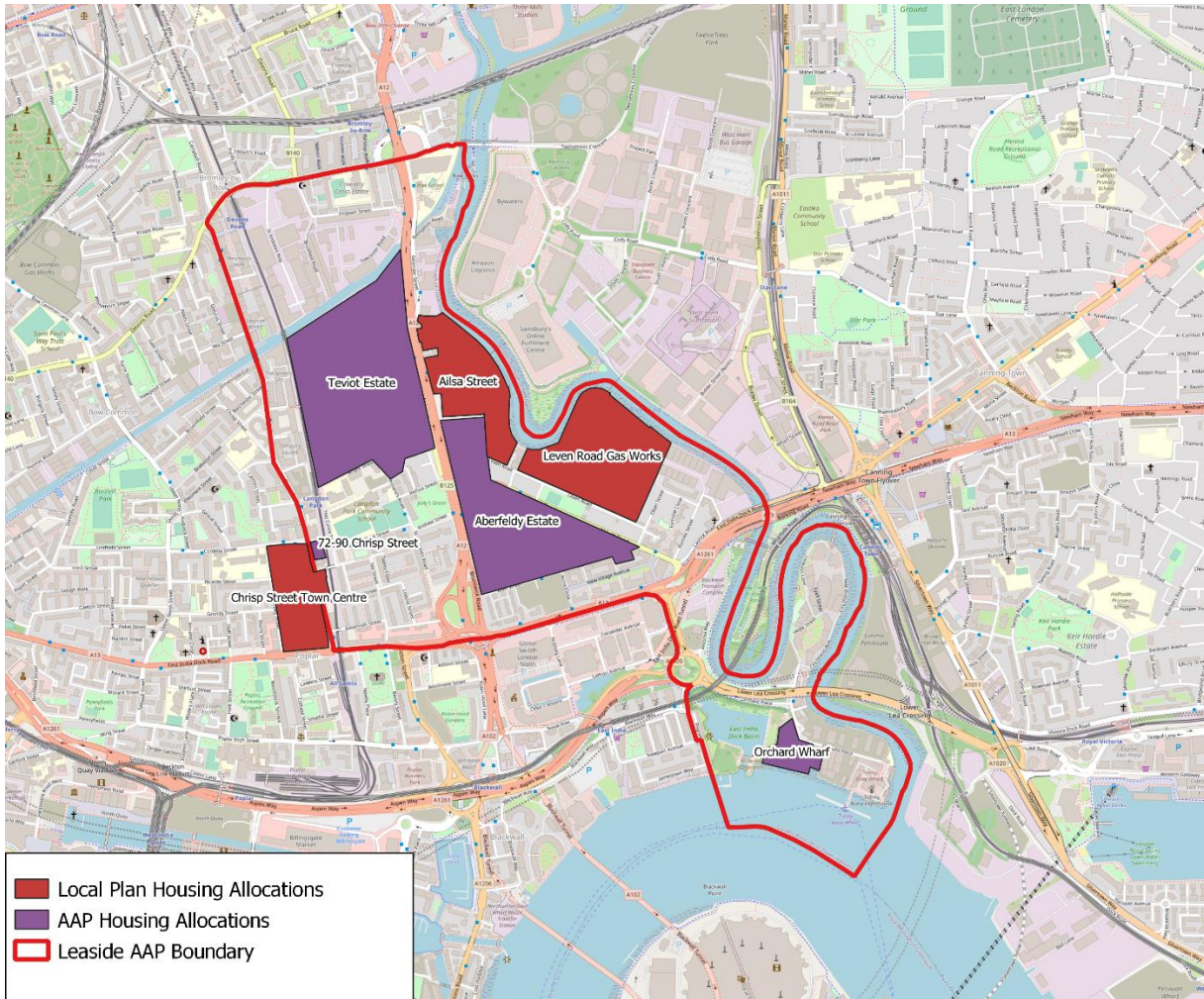


Figure 13: Proposed AAP housing allocations, with existing Local Plan housing allocations shown

POLICY LS2 – AFFORDABLE HOUSING AND ESTATE REGENERATION

A – Proposals for schemes that include the demolition of existing affordable rented housing are expected to provide a minimum of 35% affordable housing on the uplift in housing numbers on the site. The re-provision of existing affordable housing will not count towards the minimum requirement for affordable housing.

B – On regeneration proposals that incorporate several phases of development, the minimum of 35% affordable housing will be sought across all phases considered cumulatively. Proposals should seek to deliver the majority of affordable housing in earlier phases.

C – Proposals for estate regeneration should follow the Council’s Estate Regeneration Pathway, including ensuring that ballots do not take place until after discussions have been held with LBTH on proposals.

Explanation

- 4.13. This policy aims to ensure that estate regeneration projects in the Leaside area deliver a suitable amount of affordable housing and are delivered in a way that ensures existing residents are clear about what will be delivered. Estate regeneration can provide a range of benefits to the borough, including improved housing, new community facilities, and infrastructure improvements such as additional open spaces or improved connections. They also have the opportunity to provide significant amounts of new housing, including affordable housing.
- 4.14. It is expected that existing affordable housing on the site, which is demolished as part of the regeneration, will be re-provided at the same rent level, and with at least the same space standards. The Tower Hamlets Local Plan requires that on estate regeneration schemes “any net additional homes are also subject to the affordable housing requirements in Policies S.H1 (Part 2) and D.H2 (see Parts 1 and 2)” (paragraph 9.40). Under Part A of this policy, the additional housing in the proposal is therefore expected to provide a minimum of 35% affordable housing in line with the tenure mix set out in Local Plan policy D.H2.
- 4.15. Part B requires that when a development includes several phases, the minimum target of 35% affordable housing should be met across all phases. This allows for some flexibility in the provision of affordable housing on different phases, but it is expected that this should be used to deliver more affordable housing earlier in a scheme, and proposals that ‘back-load’ all or a significant portion of the affordable housing to later phases of the scheme will not be supported. In line with London Plan policy H8, all

proposals that involve the demolition and replacement of affordable housing are expected to follow the Viability Tested Route to ensure there is as great an uplift as possible in affordable housing.

4.16. Where later phases of a scheme are submitted for detailed planning permission with a greater number of units than included in an outline permission, affordable housing requirements will be re-calculated accordingly to ensure that a minimum of 35% is provided across the scheme as a whole.

4.17. Part C relates to estate regeneration proposals that are required to (or choose to) undertake resident ballots on estate regeneration schemes. It is expected that pre-application discussions with LBTH should have taken place before proposals are put to residents in a ballot, but after initial discussions have taken place with residents to ensure that proposals are informed by their views. This is good practice to ensure that what is being offered to residents does not contradict any of the borough's planning policies, and that they receive an accurate understanding of what can be delivered on their estate.

4.18. The expected process for bringing forward estate regeneration proposals is set out in the Council's Estate Regeneration Pathway document⁵, which sets out a clear process for initiating discussions with the Council and for developing a landlord offer that takes into account resident views and planning policy considerations from an early stage.

4.19. When running ballots on estate regeneration projects, other elements of good practice in engagement with residents are encouraged, including:

- Early engagement, giving residents opportunities to be involved in developing the vision, options appraisals, design, procurement and delivery of schemes.
- Supporting residents to get involved by providing independent capacity-building and advocacy support for residents if they request it, and the opportunity to select their own independent tenant and leaseholder advisors (ITLAs) paid for by landlords.
- Resident Charters provided at an early stage of the discussions, setting out commitments to residents in clear, non-technical language.
- Further advice set out in the Mayor's Good Practice Guide to Estate Regeneration (February 2018)⁶

⁵ <https://www.towerhamlets.gov.uk/Documents/Housing/Estate-Regeneration-Pathway.pdf>

⁶ <https://www.london.gov.uk/sites/default/files/better-homes-for-local-people-the-mayors-good-practice-guide-to-estate-regeneration.pdf>

POLICY LS3 – RESIDENTIAL DEVELOPMENT ALONG ROAD CORRIDORS

A – Residential development in buildings that are adjacent to the A12 and A13 road corridors must address the design considerations set out below.

- i. Planting should be used to improve local air quality in the vicinity of the road corridor.
- ii. Opportunities to open up pedestrian and cycle permeability between the road corridor and other streets should be explored.
- iii. Proposals should consider the possible uses of level changes, to provide access to buildings at different levels and encourage a mix of uses.
- iv. Access to and around buildings near the road corridor should provide well-lit, high quality public realm.
- v. Play space should be located away from major road corridors.
- vi. Balconies should face away from the road corridor, or be protected winter gardens.
- vii. All homes with habitable rooms facing the road corridor must be dual aspect.

Explanation

4.20. The major road corridors of the A12 and A13 have a huge impact on the AAP area. From many perspectives, these two roads are unfortunate neighbours to have – they bring with them poor air quality, noise, severance, safety issues, and unpleasant public realm. If the Mayor’s Transport Strategy aim of 80% of all journeys in London being taken by public or active transport becomes a reality, the level of traffic on these roads may reduce over time. This may also happen in combination with the opening of the Silvertown Tunnel, which may open new potential routes for some of the remaining car journeys. But, as key strategic routes in the London road network, these two roads are likely to remain as busy, car-focused arteries for the duration of the AAP.

4.21. At the same time, it is expected that significant housing developments will begin to come forward adjacent to these road corridors during the AAP period. This policy recognises the difficulties in delivering housing next to major roads and sets out expectations and requirements for such development in order to promote the delivery of high-quality homes that are well integrated into the wider neighbourhood. This includes opening up additional permeability between the housing estates and the pavements along the major roads, to ensure that if further traffic-calming and traffic reduction takes place on these roads in the future, the roads can be more easily linked into existing active travel networks. This should not be seen as a reason to locate housing or play space where they would be subject to high levels of air pollution and traffic noise. Instead, it is an opportunity to consider how the public realm along these

major roads can be improved and can be used to mitigate noise and pollution impacts on residents.

- 4.22. The design considerations set out in this policy may also be conducive to good design on sites next to other major thoroughfares in the area, such as Devas Street, Chrisp Street, and Morris Road.
- 4.23. Part (i) requires that planting strategies should consider how to mitigate the impacts of poor air quality around major road corridors. This could include the provision of 'green screens' to dampen noise and absorb air pollution along the road, and the provision of pleasant, permeable green routes for pedestrians and cyclists between residential areas and the road.
- 4.24. Parts (ii) to (iv) set out policies designed to improve the relationship between road corridors and the adjacent residential development. Often residential developments turn away from road corridors, hiding behind barriers, without entrances from the development onto major roads, and presenting a blank face to the roadside. This in turn means there is no encouragement to improve the public realm or lighting along the road, further discouraging its use for anything other than motor vehicle transit. By opening up permeability and encouraging facades to provide some surveillance of the road corridor, the road can begin to be seen as part of the wider street network.
- 4.25. Part (v) also focuses on site layout, by requiring play space for all ages to be located away from the areas of poor air quality around major roads. On large schemes there should be no reason for play space to be located close to major road corridors. Placing play space in more tranquil, less car-dominated areas can also reduce the need for further barriers to pedestrian permeability between the road corridors and the wider street network, which might be required for safety if children were playing nearby.
- 4.26. Parts (vi) and (vii) further emphasise the need to sensitively address air quality issues around road corridor developments. While buildings should address the road corridor to some extent, rather than turning a blank face to it, this should not be in the form of exposed, open balconies where residents would be expected to spend time relaxing outdoors directly above a major road. All homes should ideally be dual aspect, and part (vii) requires a dual aspect where any habitable rooms face the road corridor, so it should be possible to find design solutions that do not place open balconies in areas where poor air quality will affect inhabitants.

POLICY LS4 – RESIDENTIAL DEVELOPMENT ALONG WATERFRONTS

A - Residential development in buildings that are adjacent to water spaces (including the River Lea, the Limehouse Cut Canal, the River Thames, and the East India Dock Basin) are expected to address the design considerations set out below.

- i. Development should provide strong, active frontages onto both the waterway and the wider street network.
- ii. Development should contribute to the creation and enhancement of publicly accessible paths along waterways, and between waterways and the wider street network.
- iii. Existing views to water spaces should be maintained and, where possible new views created.
- iv. Development should respond positively to the industrial heritage of the area, retaining existing buildings where appropriate, and utilising materials and features on new buildings that reflect the historic character of the area.
- v. The scale and height of development should reduce as it approaches the waterfront

Explanation

4.27. Waterspaces are one of the key potential strengths of this area, but are currently underutilised. Limited connections over the waterways and the dominance of employment uses in these areas has resulted in the waterways being isolated from surrounding neighbourhoods. Therefore, as land comes forward for development in these areas it is important that design principles are followed to ensure that new development unlocks access to the waterway.

4.28. Part (i) acknowledges that buildings adjacent to water spaces present a dual face onto the water on one side and the street network on the other. Development should look to provide active frontages on both sides, and consider the potential mix of uses that can help to activate both the waterside and the streets.

4.29. Part (ii) requires that development along waterways contribute to the creation of new publicly accessible paths along waterways where they do not currently exist; and to the enhancement of existing paths where these do exist. This is in line with the aim set out in policy LS11 to provide good quality public access along the length of the River Lea. Enhancements to existing paths could include improved, ecology-sensitive lighting, resurfacing where necessary, and an increase in green and biodiverse elements along the paths.

- 4.30. Part (iii) emphasises the importance of existing views of the water from both buildings and the street network, and encourages development proposals to look at site layout possibilities that create new views of water spaces.
- 4.31. Part (iv) requires new development to work within the existing industrial heritage context of the area. Where possible, existing buildings should be retained or re-used, in whole or in part, an approach which provides heritage and sustainability benefits. Proposals for new buildings should examine the materials and architectural features of existing buildings on site and in the immediate surroundings, and consider how these can be reflected in the new development.
- 4.32. Part (v) sets out the principle that the scale of development should reduce as it approaches the waterfront, with buildings 'stepping down' in height and bulk. This is consistent with the Local Plan policy on the Leamouth Tall Buildings Zone, but should also apply on other development sites along the water.
- 4.33. The Conservation Area Character Appraisals for Langdon Park and Limehouse Cut provide additional guidance on the character of some of the waterside elements of the AAP area.

Additional Policy Area – Tall Buildings

4.34. Local Plan Policy D.DH6 directs tall buildings within the borough to a number of designated Tall Building Zones. One of these Tall Building Zones, Leamouth, is within the AAP area. Within this zone, the policy states that tall buildings within the cluster should step down towards the River Thames and ensure glimpses and views across the cluster.

4.35. The Local Plan tall buildings policy also sets out a range of criteria that any proposals for tall buildings within the Tall Buildings Zones will need to meet.

4.36. The Council may also support tall building proposals outside of the Tall Building Zones provided that they meet the criteria set out in the policy and that they also demonstrate how they will:

- Be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas
- Address deficiencies in the provision of strategic infrastructure
- Significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area, and
- Not undermine the prominence and/or integrity of existing landmark buildings and Tall Building Zones.

4.37. For the purposes of the tall buildings policy, a tall building is classified as any building that is significantly taller than its local context and/or has a significant impact on the skyline. Within the borough, any building of more than 30 metres, or which is more than twice the height of surrounding buildings (whichever is less) will be considered to be a tall building.

4.38. The tall building policy aims to guide and manage the location, scale and development of tall buildings in the borough and steer them towards the locations where they positively contribute to the local environment and do not cause harm to the character and identity of an area, either individually or cumulatively.

4.39. The Council has recently commenced the preparation of more detailed work that will provide greater clarity to this policy, and following the direction of Policy D9 in the London Plan will identify potential locations for tall buildings and the maximum height of buildings that might be acceptable for each location.

4.40. This evaluation will be informed by:

- An understanding of the existing and emerging character of an area (and its vicinities);

- Testing of the impact and contribution of potential buildings in long-range, mid-range and immediate views including those designated in the London View Management Framework (LVMF) and in the Local Plan under Policy D.DH4 on Shaping and Managing Views;
- Consideration of how a tall building may help to reinforce the spatial hierarchy of an area or aid legibility and wayfinding;
- Consideration of the potential impact on heritage assets and their settings; and
- An understanding of the cumulative impact of more than one tall building.

4.41. The Council intends to capture this information within a Tall Buildings Supplementary Planning Document (SPD). The SPD will also provide guidance on tall building typologies and what type and form may be appropriate in different areas, how tall buildings should respond and interface with the street environment and public realm, servicing and access, materials, lighting and impacts on microclimate.

4.42. The Tall Buildings SPD will cover the whole borough and the Council will engage with stakeholders and the wider public through its preparation. Introductory workshops took place in November and December 2020, and it is intended that the SPD will be adopted in Summer 2021.

4.43. Each of the four site allocations identified in this chapter indicate the potential for tall buildings, if the requirements of Policy D.DH6 can be met. The SPD will provide greater clarity on this potential. The SPD may also identify other locations within the AAP area that may be appropriate for tall buildings. The guidance in the Tall Buildings SPD will help to inform updates to the AAP in advance of the Regulation 19 consultation.

4.44. At this stage we would like to understand your opinions on the role of tall buildings in delivering additional homes within the AAP area, and your ideas on locations that may be particularly suitable for tall buildings, or particularly sensitive to the impacts of tall buildings.

Consultation Questions – Housing Delivery

- Is the strategy of focusing new housing on estate regeneration projects and redevelopment of some industrial land appropriate? If not, what alternative approach should be taken?
- Are there additional site allocations that should be included in the plan?
- Should the site allocations include indicative housing capacity figures and/or indicative building heights, based on a design-led capacity assessment of each site?
- Are the design, connectivity, and delivery criteria on the site allocations appropriate? If not, what should be changed?
- How can proposals for development best demonstrate that they have optimised capacity? Are there specific instructions that should be provided on undertaking design-led capacity assessments, beyond that provided in the London Plan and its supporting guidance?
- How can development along busy road corridors best respond to that context? Is it appropriate for estates to begin to ‘open up’ in relation to the road corridors, in anticipation of future changes to these roads; or should they continue to ‘turn inwards’ and face away from the roads?
- How can the industrial heritage of the AAP area be reflected in design of new developments?
- What role should tall buildings play in delivering new homes within the AAP area? Are there any parts of the AAP area, outside of the designated Leamouth Tall Building Zone, that are suitable for tall buildings, or which would be particularly sensitive to the impacts of tall buildings?

5. Employment

- 5.1. Tower Hamlets plays an important role in London's economy, with major office-based employment centres in the City Fringe and Canary Wharf areas in the west and south of the borough. The AAP area also fulfils an important economic function – but a very different one. The area has historically been an industrial one, and an important area for shipping due to its access to the rivers Thames and Lea and the Limehouse Cut canal.
- 5.2. This industrial function continues today, with a Strategic Industrial Location at Empson Street and a number of smaller employment locations along the River Lea and on the Leamouth Peninsula. The Tower Hamlets Local Plan set an expectation for the Lower Lea Valley sub-area to accommodate a further 45,000sqm of industrial floorspace, and an additional 8,748sqm of office floorspace, by 2031. The Poplar Riverside Land Audit estimated that as of 2018 there were approximately 6,400 jobs in the AAP area, with 17% of these being in the manufacturing sector – and only 2% being in the finance and insurance sectors, in inverse relation to the proportions across the borough as a whole.
- 5.3. This employment function is increasingly having to share space with a growing residential population, but the ongoing importance of the AAP area as a location that can provide new jobs should not be underestimated – in the Local Plan, the Lower Lea Valley sub-area is expected to provide a total of 45,000sqm of industrial floorspace, creating over 1,000 new jobs. The continued presence of a range of employment options in the area will also be key to delivering the vision of a socially cohesive area, where people can live, work, shop, and relax at all ages.
- 5.4. This chapter therefore sets out the approach to protecting industrial and employment uses in the AAP area, while allowing an increasing amount of residential uses to be brought forward. Policy LS1 has set out that the sensitive redevelopment of industrial land to enable the delivery of residential uses in combination with continued industrial uses will be supported. This chapter sets out principles for development for the intensification of industrial uses on the Empson Street Strategic Industrial Location, and the co-location of residential and employment uses at the Blackwall Trading Estate Local Industrial Location.
- 5.5. This is followed by three policies that more generally address the retention of existing employment space (LS5), the delivery of new or redeveloped employment space (LS6), and the design of employment space (LS7) in the area, which will be useful if sites develop in a piecemeal fashion or if additional opportunities for employment uses come forward on sites within the area.
- 5.6. In the Local Plan, it is noted that the term 'employment use' refers to B-class uses and sui generis industrial uses. Since the adoption of that plan, changes to the use class

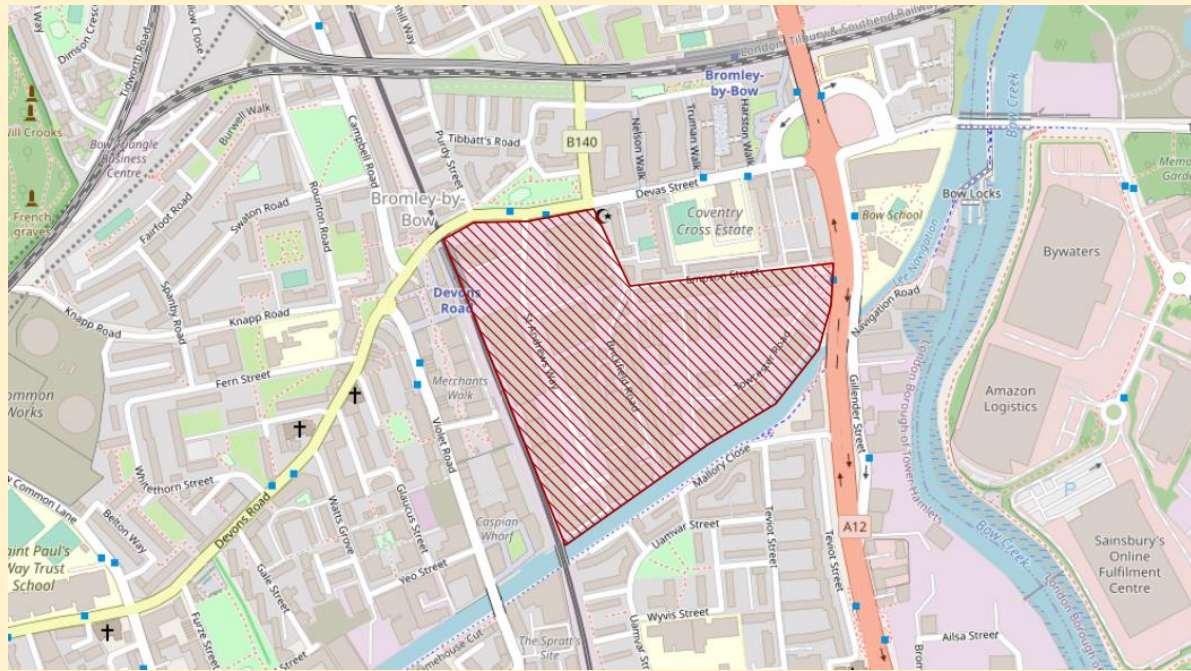
order have made the B1 use class redundant. However, the uses that were previously captured under the B1 class – offices, research and development, and light industrial – are still clearly distinct from the other town centre uses that have been combined into the new E-class, and still have a specific role to play in certain employment-focused areas of Tower Hamlets. Therefore to clarify, for the purposes of this plan, employment uses refer to the remaining B-class uses, sui generis industrial uses, and the former B1 uses that are now within class E (offices, research and development, and light industrial).

5.7. Key pieces of evidence for this chapter include:

- Leaside Employment Study (2020)
- Industrial Intensification Study (2020)
- Lower Lea Valley Connection and Movement Study (2020)
- East of the Borough Characterisation and Site Capacity Study (2020)
- Green Grid Strategy Update (2017)

SITE LS-E – EMPSON STREET STRATEGIC INDUSTRIAL LOCATION

The Council encourages proposals to intensify employment uses and increase employment floorspace on this site. The Council will particularly encourage opportunities to increase the throughput of waste uses on this site. Development for residential uses will not be acceptable on this site. Development is subject to the design, connectivity, infrastructure and delivery criteria set out below, and must be in accordance with other development plan policies.



Size	10.5 ha
PTAL	2-4
Local Plan Designations	<p>Waste Management Site: Clifford House</p> <p>London Cycle Network: Along Devas Street</p> <p>Conservation Area: Limehouse Cut</p> <p>Strategic Industrial Location: Whole site</p> <p>Publicly Accessible Open Space: Devons Road Ambulance Station Grass Verge</p> <p>Site of Importance for Nature Conservation: London's Canals</p> <p>Green Grid: St Andrew's Way, Devas Street</p> <p>Area of Deficiency of Access to Nature: southern end of St Andrew's Way</p> <p>Area of Substandard Air Quality: northern end of St Andrew's Way, eastern end of Empson Street</p>
Suitable Land Uses	Employment uses (light industrial, heavy industrial, warehousing, sui generis industrial uses)

Context

The Empson Street site is the borough's only current Strategic Industrial Location (another SIL is located within the London Legacy Development Corporation at the moment, and will return to the borough's jurisdiction during the AAP period), and is well-used. The western side of the site contains relatively newer industrial buildings, but much of the building stock on the eastern portion of the site is ageing, and may soon need redevelopment. This presents an opportunity to intensify the SIL, provide more employment floorspace within the same site area, which could potentially be used by heavier industries from elsewhere in the AAP area or the rest of the borough, freeing up more suitable land for co-location of housing and lighter industrial uses. Residential development would not be compatible with the expected mix of uses on this site, and any proposals for residential development will be resisted.

Design and Layout Principles

- Given the typical layout of industrial uses that would be appropriate on this site, a coarser grain of development is acceptable, with larger building plots and block sizes than would be expected on residential development in the borough. However, development should still aim to achieve a permeable layout with safe walking routes through the site where possible.
- Design of new buildings should address the industrial heritage of the area in terms of materials and form, and should especially respond to the character of the Limehouse Cut conservation area. Redevelopment of the two buildings on the site that sit within the conservation area should be especially sensitive, and should aim to retain the original features and layout as far as possible.
- Innovative typologies to achieve additional employment floorspace, such as stacked industrial buildings, will be supported. Such proposals should demonstrate how the proposed typology is suitable for an intended occupier, or for a wide range of potential industrial uses if no intended occupier has yet been secured.
- Other options for increasing employment floorspace could include a reduction in yard space or sharing yard space between multiple occupiers – in all instances, proposals will need to demonstrate this will be an appropriate solution for intended or potential occupiers.
- Redevelopment along the Empson Street edge should be treated carefully, in line with the principles of policy LS7, and should aim to provide a more active and pedestrian-friendly frontage onto the street. This could include provision of smaller, flexible workspaces in line with policy LS6.

Connectivity Improvements

- If possible, development should explore opportunities to extend green grid access down St Andrew's Way and open up access to the northern edge of the Limehouse Cut Canal, in line with the Green Grid Strategy. There may be a possibility to create a new pedestrian and cycle crossing of the Limehouse Cut from St Andrew's Way to Brushwood Close, in combination with site allocation LS-B, and land may be required to be safeguarded for such a bridge crossing.
- Opportunities should be explored to open up connectivity within the site, where this is compatible with the operational needs of occupiers. This can help to encourage the use of active travel and public transport to access the site.

- Development on the site should contribute to improved lighting and signage of the subway under the A12 on the eastern edge of the site, and, if possible, the adaptation of the subway for joint pedestrian and cycle use.
- Development at the northern end of the site may be able to contribute to connectivity improvements along Devons Road, including the introduction of segregated cycling provision.

Infrastructure and Delivery

- Delivery of an upgraded waste facility on the SIL will be supported where it provides an increase in waste throughput.
- Development should explore opportunities to deliver biodiversity improvements along the Limehouse Cut canal.
- As part of proposals for significant intensification of industrial uses on the site, discussions should be held with Transport for London and the Council about the possibility of opening direct access to Empson Street from the A12. This may require additional work to relocate the entrance to the pedestrian subway under the A12, and this opportunity should be taken to improve the public realm leading to the subway.
- Where possible, development should come forward in a coordinated and comprehensive manner, rather than through the piecemeal development of small plots.

SITE LS-F – BLACKWALL TRADING ESTATE LOCAL INDUSTRIAL LOCATION

The Council encourages proposals to co-locate residential uses and light industrial (class E or sui generis) or B8 uses on this site, providing suitable residential amenity can be demonstrated and there is no net loss of employment floorspace. Development is subject to the design, connectivity, infrastructure and delivery criteria set out below, and must be in accordance with other development plan policies.



Size	1.7 ha
PTAL	1b-3
Local Plan Designations	<p>Borough Designated View: from East India Dock Road to Balfour Tower with Canary Wharf in the background</p> <p>Local Industrial Location: Whole site</p> <p>Site of Importance for Nature Conservation: River Thames and Tidal Tributaries</p> <p>Green Grid: Lanrick Road</p> <p>Flooding: Flood Risk Area, Flood Zone 3</p> <p>Area of Substandard Air Quality: eastern end of site</p>
Suitable Land Uses	<p>Employment uses (light industrial, warehousing, sui generis industrial uses)</p> <p>Residential</p>

Context

The Blackwall Trading Estate is located along the River Lea, adjacent to the Leven Road site allocation from the Local Plan, and a short walk from the Aberfeldy neighbourhood centre and accompanying redevelopment – in many ways, an ideal site for housing in this part of the borough, although the south-eastern side of the site suffers from poor air quality due to traffic along the A13 river crossing. The industrial site is well-used with very

few vacancies, and redevelopment will require suitable employment provision to accommodate existing uses, and ideally to provide additional employment space.

Design and Layout Principles

- Residential uses on this site should be located towards the north and west, further away from the poor air quality caused by the A13.
- Frontages should address both sides of the development, along the waterfront and facing the public realm of the street along Lanrick Road, in line with policies LS4 and LS7.
- The scale and massing of development to the south and east of the site should not undermine the setting of, and views towards, Balfour Tower. This borough-designated landmark and its striking and distinctive silhouette are highly prominent on the approach into the borough from the elevated A13 both as the route crosses the DLR at Canning Town and as it descends from the crossing of Bow Creek.
- Employment elements of the site should be arranged to provide active frontages facing the residential element of the site; while vehicle-based access to the employment elements should be separated from the points of residential access.

Connectivity Improvements

- Development must provide public access to the River Lea waterfront along the length of the entire site.
- Consideration should be given to how the site can connect with the adjacent Leven Road site allocation and to the new public park on that site, and between the riverfront and Abbott Road.

Infrastructure and Delivery

- In line with policy LS5, new class E employment uses may be conditioned to ensure they remain in the given employment use until permission is given for a change of use.
- Landing space should remain safeguarded in the east of the site for a potential connector bridge running underneath the A13.
- Development should explore opportunities to deliver biodiversity improvements along the River Lea.
- The site lies within an area of significant flood risk, and surface materials and landscaping should be designed to reduce the risk of flooding as effectively as possible. A flood risk assessment will be required as part of any proposal.

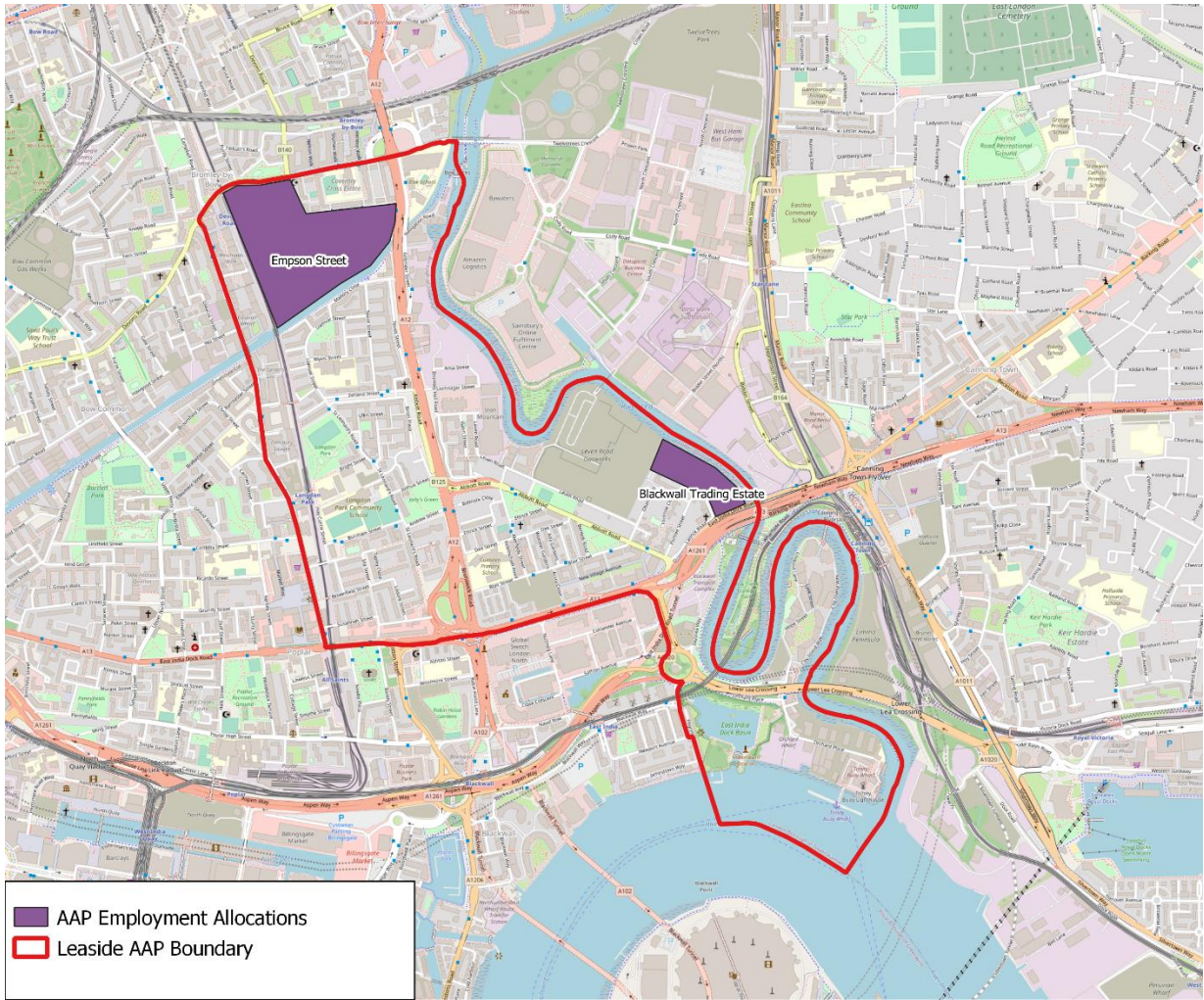


Figure 14: Proposed AAP Employment Site Allocations

POLICY LS5 – RETENTION OF EMPLOYMENT SPACE

A - Changes of use from B2, B8 or SG industrial uses to E class employment uses will not be supported within the Strategic Industrial Location (SIL).

B – Within Local Industrial Locations (LILs), changes of use from B2, B8 or SG industrial uses to E class employment uses (formerly B1(a), B1(b), and B1(c)) will only be supported where there is a condition for the site to remain in those uses unless planning permission is granted for a change.

C – Co-location of residential uses with industrial uses (B2, B8, E class research and development and light industrial, and SG industrial uses) will be supported in Local Industrial Locations, providing the proposal addresses the design and amenity criteria set out in policy LS7 below.

D – Within the SIL and LILs, loss of E class uses will not be supported, except for changes of use to a B class use or SG industrial use that is compatible with existing uses on the site.

E – When redeveloping LIL sites to accommodate co-location, existing E class uses on-site should be reprovided as B class uses, SG industrial uses, or E class employment uses with conditions to retain those employment uses.

Explanation

- 5.8. This policy responds to the recent changes in the Use Class Order that have moved some employment uses into a general ‘town centres’ E-class use. This requires a new approach to designated employment locations intended for B-class uses current and former. The changes to use classes means that sites that were formerly within the B1 use class could now change to retail, restaurants, estate agents, or even health centres without planning permission – despite often being located in places that would not normally be considered appropriate for such uses. Policy LS5 aims to ensure that the negative impacts of this change on industrial locations is kept to a minimum by guiding the potential changes of use within these designated employment locations.
- 5.9. Part A applies to the Strategic Industrial Location at Empson Street. There should be no loss of employment space on the SIL, and introducing E-class uses runs the risk of seeing a later change to an inappropriate non-employment use, if conditions to maintain the employment use are appealed against. As a location where residential is not considered suitable under any circumstances, the SIL is also able to accommodate heavier industrial uses that may relocate from other employment sites to enable residential development on those sites. On this basis, uses within the SIL should be kept to heavier industrial uses, and changes to the lighter employment uses in class E will be resisted.

- 5.10. Part B looks at changes of use in the Local Industrial Locations at Gillender Street and Blackwall Trading Estate. In these locations, the lighter employment uses now contained within class E may be more suitable, and may even be desirable to enable co-location with residential development. However, to ensure that no employment space is lost on these designated sites in the future, changes of use to class E will only be supported in conjunction with a condition requiring the floorspace to be kept in office, research and development, or light industrial uses unless and until planning permission is granted for a change to a different use.
- 5.11. Part C builds on Local Plan Policy D.EMP4, which allows for co-location of residential uses on Local Industrial Locations. Such co-location is now actively supported within the AAP area. However, all such instances of co-location will only be supported where the criteria in policy LS7 are met.
- 5.12. In some instances, there will be existing B1 class uses on designated employment sites that are now within class E due to the Use Classes Order changes. To encourage these sites to stay within employment use, part D of this policy sets out that on designated employment sites changes of use away from class E will only be supported where they are to other employment use classes.
- 5.13. Part E ensures that employment space on Local Industrial Locations is not lost during redevelopment projects by clarifying what replacement uses will be considered appropriate, and where conditions will be required on E-class uses to keep them in employment use.

POLICY LS6 – DELIVERY OF EMPLOYMENT SPACE

A – Major developments providing E-class light industrial and research and development, B-class, or sui generis employment floorspace should provide at least 10% of the floorspace as flexible, smaller units of between 25-50sqm, suitable for micro-businesses and start-ups. These units should be fully fitted out as ‘plug and play’ units for potential occupiers.

B – Micro-employment spaces of between 25-50sqm will be supported on the ground floors of residential-led developments within the AAP area, provided that a reasonable likelihood of occupation can be demonstrated.

C – Stacked industrial typologies on designated employment locations will be supported where they provide a range of unit sizes for different intended occupiers, and meet the requirement of clause B to supply at least 10% of flexible, smaller units.

D – On strategic development on designated employment locations, the provision of ancillary uses such as cafes and small-scale retail will be supported.

E – All proposals for employment floorspace should be accompanied by a Commercial Strategy Statement explaining the suitability of the employment space.

Explanation

- 5.14. This policy aims to set out a vision for how new employment space should be provided in the AAP area. This will be particularly applicable to redevelopment on the designated industrial sites, but will also encourage the delivery of new, smaller employment spaces in residential-led developments – creating an urban fabric where residential and employment opportunities are interspersed, and neighbourhoods see activity throughout the day.
- 5.15. Part A sets out that within the AAP area major developments with workspace should provide 10% of that floorspace as smaller, flexible units of between 25-50sqm that can be aimed at makers, micro-businesses, start-ups, and creative enterprises. The idea of these units is to provide a small, affordable space for local businesses to be started and to grow, and to encourage quick occupation and ease of access they should be fully fitted out as ‘plug and play’ units, rather than requiring occupiers to finish the fit-out. This policy will not apply to E-class office uses, but will apply to all other industrial uses in the AAP area – E-class light industrial and research and development, B-class uses, and sui generis industrial uses.
- 5.16. In exceptional circumstances where the requirements of part B cannot be met on-site, an alternative provision of the same floorspace may be provided on an alternative

site. In the first instance, this should be provided elsewhere within the AAP area; and then elsewhere in the borough if no suitable location can be found within the AAP area.

- 5.17. Part B further supports these smaller units by encouraging them to be provided on the ground floor of new residential-led developments, where a reasonable strategy for ensuring their occupation has been set out by the applicant. Large parts of the AAP are within a flood risk area, which limits potential ground floor uses. In general, developers have tended to default to providing retail, café, and restaurant units at ground level, only to find difficulty in letting these spaces out, especially when they are located some distance from traditional town centres. The provision of smaller employment units could provide a more flexible alternative use that can thrive without the need for regular passing footfall, and will be supported in this area. Developers proposing these units will need to demonstrate that suitable servicing and access arrangements can be put in place.
- 5.18. Part C provides support for stacked industrial typologies within the designated employment locations, examples of which are set out in the Tower Hamlets Employment Study. These are an innovative new method of intensifying employment floorspace by creating industrial buildings of more than one storey, and can potentially contain a range of employment uses on different floors using units of different sizes and varying ceiling heights. By providing for this range of occupiers, including the required 10% of micro-units, development can create a community of employment uses supporting and complementing one another.
- 5.19. In relation to these larger, stacked developments, Part D sets out support for ancillary uses that would not meet the normal use class requirements for designated employment locations, but which provide useful services to that community of businesses. This includes café uses and small-scale retail uses – both to supply employees with basic needs, but also in the sense of allowing small retail counters for businesses that may benefit from selling some goods direct to customers on-site.
- 5.20. Part E requires all development proposals including employment floorspace to provide a Commercial Strategy Statement which will set out a suitable strategy for ensuring that workspace is quickly and consistently occupied. This will require developers to explain why a particular design and specification has been chosen and who its intended occupiers are; and to provide a marketing strategy and indicative rental levels where intended occupiers are not already in place. Generic employment spaces with no clear expectation for what kinds of businesses can occupy them will be discouraged, in favour of a more tailored approach that aims particular workspaces at particular kinds of occupier, and is designed and fitted out accordingly.

POLICY LS7 – DESIGN FOR CO-LOCATION OF RESIDENTIAL AND INDUSTRIAL

A – Where industrial sites are being redeveloped in a mixed-use development with residential uses, or in close proximity to residential uses, development should address the following design principles:

- i. Active areas such as receptions, workshops, or ancillary retail facilities should be located at ground level along the street frontage
- ii. Doors and windows should create high levels of visibility onto active uses from street level
- iii. Buildings should be developed along the building line to create a consistent street frontage
- iv. Yards should be located away from the street edge
- v. Access for employment and residential uses should be separated, and access to residential uses should be located along the streetfront
- vi. Materials and façade treatment for public-facing elements of industrial uses should be of as high a quality as would be expected for residential uses, and should act to reduce noise pollution from industrial uses
- vii. Residential amenity in co-location developments should not rely on permanent sealing of windows
- viii. Outside amenity space on co-location developments should not overlook industrial yard spaces
- ix. Landscaping and planting should be used in suitable locations to reduce noise pollution from industrial uses and provide air quality and biodiversity benefits

Explanation

5.21. The AAP area includes a number of locations where primarily industrial employment uses meet residential developments, such as around the Empson Street Strategic Industrial Location and the Blackwall Trading Estate Local Industrial Location. The public realm in these locations is usually of poor quality and dominated by blank facades and other unappealing elements.

5.22. Through the strategy of encouraging co-location of residential and employment uses, the AAP provides the opportunity to address these industrial/residential borders and improve the experience of these areas, while retaining existing employment floorspace. In the case of the Strategic Industrial Location, residential co-location will not be supported, but any redevelopment to intensify the employment uses on this site should also consider where the principles in this policy can be applied.

5.23. Parts (i) to (iii) set out policies around active, appealing frontages. This is a key element to the redesign of these industrial areas, which commonly present long blank facades to the street at present. Instead, built elements should provide a consistent street frontage with the opportunity for regular entrances and windows where activity

can be made visible. This provides active and passive surveillance onto the street, but also provides general visual interest to those passing by.

- 5.24. Part (iv) requires that yards and vehicle parks should be set away from the street edge, a corollary of emphasising building frontages along the street. This will make the areas around industrial sites appear less vehicle-dominated than at present. Vehicle access points should be designed to allow safe crossing by pedestrians and suitable visibility for drivers entering and exiting the site.
- 5.25. Part (v) protects residential amenity by separating access for residential and employment uses. In instances where residential and employment uses are located within the same building, this will also mean additional entrance points on the building frontage, adding further interest and opportunities for activity at street level.
- 5.26. Part (vi) stipulates that as the frontages of new industrial buildings are expected to form part of the street level, it is important that the materials and façade treatments are given as much importance as they would be for any new residential development.
- 5.27. Part (vii) requires that residential amenity in co-location schemes should not rely on permanent sealing of windows. Recent appeal decisions have made clear that permanently sealed windows are not an acceptable solution to the amenity problems of co-locating residential and industrial uses, as they do not meet the requirement in paragraph 127 of the NPPF to promote health and wellbeing and a high standard of amenity. Issues of noise and air quality that are raised on these schemes should also be addressed via other means, such as materials and layout.
- 5.28. In relation to layout, part (viii) requires that outdoor amenity space such as balconies should not overlook the yard space for the employment elements of a co-location development. This can be avoided through orientation of residential buildings and layout and location of yard space.
- 5.29. Part (ix) refers to the multiple benefits that can be achieved by strategically placed planting on industrial and residential co-location sites, to block noise and improve air quality and biodiversity.

Consultation Questions – Employment

- Is the approach of maintaining Empson Street exclusively for employment uses appropriate? Is it appropriate to encourage redevelopment of the site for intensified employment uses?
- Is the approach of encouraging co-location of residential and light industrial uses on the Blackwall Trading Estate appropriate?
- Are there further design factors that need to be considered to make residential uses acceptable on the Blackwall Trading Estate? Or to better deliver the co-location of residential and employment uses on other sites?
- Are there additional employment-led site allocations that should be included in the plan?
- Is the approach to retaining employment uses in policy LS5 the right way to deal with recent changes to the Use Classes Order? Will this approach ensure that employment space is adequately protected in designated employment locations?
- Is the approach to providing smaller, more flexible industrial workspaces appropriate in this area? If not, what strategy would be more suitable?
- What further details should a Commercial Strategy Statement include?

6. Movement and Connectivity

- 6.1. Tower Hamlets is a well-connected inner London borough, with access to underground lines, the Docklands Light Railway, numerous bus routes, and, soon, new Crossrail stations at Whitechapel and Canary Wharf. However, the AAP area is relatively isolated within the borough. The area contains no underground lines, with only two DLR stations (Langdon Park and Devons Road) running up the western edge, and bus routes are limited.
- 6.2. The AAP area is close to some other connections, with Bromley-by-Bow and Canning Town underground stations nearby to the north and east, and further DLR lines running to and from Canning Town to the south and east. But the area is surrounded by barriers to movement that make getting to these stations difficult and time-consuming. These barriers include the A12 and A13 roads, as well as busy Devas Street and Twelvetrees Crescent; the DLR tracks in the west; and the River Thames, River Lea, and Limehouse Cut canal.
- 6.3. In all cases, the crossings of these barriers are limited. In some cases, they also need to be made more appealing to encourage walking and cycling to public transport. This issue of poor quality can also extend into the wider public realm of the area, with roads that feel dangerous for cycling, a lack of road crossings and confusing junctions, and walking routes that pass blank facades or poorly-lit areas that feel unsafe.
- 6.4. This chapter sets out the approach to improving these routes and connections, and to reducing car dependence in the AAP area. A Connection and Movement Study undertaken as part of the evidence base for this plan has identified where these problems have the biggest impact, and what interventions can be undertaken to address them and to encourage quicker and easier movement within the area and between the AAP area, the rest of the borough, the neighbouring borough of Newham, and the nearby London Legacy Development Corporation area around the Olympic Park. These major interventions, as well as the Council's joint commitment with Newham to delivering additional bridges over the River Lea, is set out in policy LS8.
- 6.5. By implementing improvements to walking and cycling in the area, we can go some way towards achieving the proposed outcomes of the Tower Hamlets Transport Strategy 2019-41: for Tower Hamlets to be one of the best places to walk and cycle in London; for car use to be reduced in favour of active, efficient, and sustainable transport; for people to feel safe and confident when travelling in the borough; and for air quality to be improved and our surroundings to be quieter and more appealing.
- 6.6. Addressing these connectivity issues is one of the three key themes in the AAP vision and has been a repeated motif in early engagement exercises. By improving connectivity and encouraging more walking and cycling, we can also contribute towards

other objectives that improve the quality of life within the area, such as road safety and air quality. The provision of safe and liveable streets is the focus of policy LS9.

6.7. Policy LS10 develops parking standards and policies for the area, with the aim of keeping the introduction of further cars to the area at a minimum. This is vital to ensure that Liveable Streets principles can be implemented, and that congestion and air quality do not worsen.

6.8. Policy LS11 requires the opening up of other key movement routes along waterfronts, and sets out requirements for how these paths should be delivered. Paths along waterfronts provide important safe and green routes that can encourage an increase in leisure activity in the area and provide access to nature, as well as being potential active travel routes for getting around the AAP area.

6.9. Together, these policies set out a vision for the area which will see a significant reduction in cars travelling through residential parts of Leaside, and a corresponding increase in the availability and safety of walking and cycling routes through the area. As an added bonus, and in conjunction with the AAP's design and biodiversity policies, these movement and connectivity policies will contribute to an improvement in air quality through the AAP area.

6.10. Key pieces of evidence for this chapter include:

- Lower Lea Valley Connection and Movement Study (2020)
- Leaside Infrastructure Delivery Plan (2020)
- East of the Borough Transport Study (2020)
- Lea River Park Design Manual (2016)

POLICY LS8 – MOVEMENT AND CONNECTIVITY IMPROVEMENTS

A – Proposals for development will be expected to improve the quality and connectivity of walking and cycling routes in the area.

B – Through funding mechanisms including S106 agreements, CIL payments, and other sources of funding, new development in the area is expected to contribute to the delivery of the following top priority interventions to improve walking and cycling connections:

- i. Segregated cycle provision along the B140 (Devas Street and Devons Road), including through removal or relocation of on-street parking.
- ii. Junction re-design at Campbell Road, Violet Road and Devons Road to replace roundabouts with T-junctions, remove guard rails, and relocate pedestrian crossings closer to desire lines.
- iii. Signalise junction of Devas Street, A12, and Twelvetrees Crescent, and open up east-west movement across the A12 at this location.
- iv. Segregated cycle provision along Violet Road, Morris Road and Chrisp Street, including through removal or relocation of on-street parking.
- v. Creation of an east-west walking and cycling ‘spine’ from the River Lea to Langdon Park DLR Station by delivering segregated cycle provision and improved footways along Lochnagar Street, Zetland Street, St Leonard’s Road, and Langdon Park. This should include an upgraded junction between Zetland Street, A12, and Lochnagar Street, with tightened turning radii and more direct pedestrian crossings, and access to the new bridge crossing at Lochnagar Street.
- vi. Closure of the slip road from the A12 onto Teviot Street, to allow a wide footway and easier north-south movement.
- vii. Creation of an east-west walking and cycling ‘spine’ between Abbott Road and Chrisp Street Market by delivering dedicated cycling provision and continuous footway crossings along Blair Street and Brownfield Street. This should include environmental improvements to the subway crossing at Balfron Tower, and aligning the Chrisp Street crossing with Brownfield Street and converting it to a ‘toucan’ crossing.
- viii. Traffic calming on Abbott Road, including dedicated cycling provision and continuous footway crossings. Upgraded, ‘toucan’-style crossings should be provided at the junctions with Aberfeldy Street, Dee Street, and Blair Street.
- ix. Remodelling of Leamouth Junction for safe cycle movement, including introduction of segregated cycling provision on the roundabout and on Leamouth Road.

C – In partnership with the London Borough of Newham and developers on relevant sites, the Council will aim to deliver up to five new crossings of the River Lea, and one additional bridge entirely within Tower Hamlets. Where relevant, development on the Tower Hamlets side of the river will be expected to contribute towards the delivery of:

- i. Lochnagar Bridge, from Lochnagar Street to the Newham SIL
- ii. Poplar Reach Bridge, from the north of the Leven Road site to Cody Dock
- iii. Mayer Parry Bridge, from the south of the Leven Road site to the Newham SIL
- iv. Leamouth Crossing, from Orchard Place to the Limmo Peninsula
- v. Trinity Buoy Wharf to Thames Wharf Bridge
- vi. A13 Connector Bridge, from the Blackwall Trading Estate, under the A13, to the Leamouth Depot site

D – Where funding is available, the Council will also seek to deliver the remaining interventions to improve walking and cycling set out in the Lower Lea Valley Connection and Movement Study.

Explanation

6.11. This policy responds to the requirement of the vision to improve connectivity in the area. As stated in the context section above, the AAP area suffers from a number of connectivity barriers, particularly large roads – the area is easy to pass through in a vehicle (barring traffic congestion), but it can be convoluted and unappealing to try to move around within the area on foot or on a bicycle. This is a reversal of the movement hierarchy we should be aiming to achieve, which prioritises pedestrians, then other modes of active transport, then public transport, with private vehicles at the bottom. This also makes it difficult for the area to contribute to the London-wide aim, set out in the Mayor’s Transport Strategy, of 80% of journeys being by taken by foot, cycle, or public transport by 2041.

6.12. The Leaside Area Action Plan runs until 2031, and it is accepted that within that timeframe there will be only limited change to the A12 and A13 roads. The A13 is subject to a DBFO contract (Design, Build, Finance, Operate) with a private company until 2031, which makes it difficult and expensive to implement a different approach to how this road operates at this time. We hope that following the expiry of the contract, the opportunity can be taken to improve safety and reduce traffic levels and speeds along this road – including implementing the recommendations of the Connection and Movement Study.

6.13. The A12 is not subject to the same constraints, but remains a major traffic artery between north and south London, and is therefore likely to carry very high levels of traffic for the foreseeable future. However, we hope that over the course of the AAP

period, general traffic volumes will begin to decrease somewhat as the Mayor's Transport Strategy to reduce private vehicle use is implemented; and the delivery of the Silvertown Tunnel in Newham (expected to open in 2025) offers an opportunity to reduce congestion on the A12 by diverting some of the traffic that currently uses the road. The extension of the ULEZ in 2021 will cover the A12 (and the A13) within Tower Hamlets and should have a positive impact on air quality, as well as potentially discouraging some car journeys.

- 6.14. On this basis, the policy sets out some opportunities to begin reducing the impact of the A12 on the Leaside area through improved crossings for pedestrians and cyclists. These will slow traffic down somewhat, and begin the long process of reorienting the movement hierarchy away from motor vehicles and towards active transport. We recognise that this will not be an immediate transformation, but we believe the time is right to begin a transition of the A12 away from a dangerous and unappealing road towards a friendlier, safer, more integrated street.
- 6.15. A different approach to reducing the negative impacts of the A12 could be taken, which might involve the provision of further at-grade pedestrian crossings to slow traffic down, the remodelling of junctions and reconfiguring of slip roads, or even placing parts of the road beneath decking. This approach may reduce traffic and the impacts of traffic more severely, and may open up some additional land for development; but would also be significantly more expensive and may require some of the other benefits of development in this area to be reduced to cover the cost of the remodelling of the road. At this time, the strategy set out in Policy LS8 is considered to be the most appropriate one for the area in terms of enabling development and ensuring viability, while also achieving significant improvements in connectivity and movement across the Leaside area.
- 6.16. Given the possibility of some traffic being redistributed from the A12 to the Silvertown Tunnel from 2025 onwards, we will also continue to work closely with Transport for London to discuss further possibilities for slowing down and reducing traffic on the A12 and reclaiming space for pedestrians and cyclists, including options for lower speed limits and a reduced number of traffic lanes.
- 6.17. With the constraints and limitations around the A12 and A13 in mind, the overall aim of this policy is to set out a series of interventions that will improve connectivity in the rest of the area, in advance of being able to see a more transformative approach to the A12 and A13 following the end of the current plan period. This is akin to putting together a jigsaw from the edges first, building a clearly understandable framework which the central pieces can then be slotted into.
- 6.18. The policy begins in part A with an expectation that all development in the area will contribute, in one way or another, to the vital work of improving the quality and connectivity of walking and cycling routes in the AAP area. In some cases, development

will be able to contribute directly to improvements by creating new connections or improved public realm. In other cases, it will contribute through financial means such as CIL payments. But the general understanding must be that development cannot come forward to the extent envisaged in this plan without an attendant increase in the quality and connectivity of the movement network.

- 6.19. Part B sets out a series of key interventions that have been identified for the area in the Lower Lea Valley Connection and Movement Study. This study has identified a very wide range of potential interventions, assessed in terms of complexity to deliver, cost, and overall impact on the movement network, and then prioritised on this basis.
- 6.20. The top priority interventions in this policy essentially enable the creation of a number of movement ‘spines’ across the region, opening up east-west routes along Devas Street, through the Teviot estate, and through the Aberfeldy and Brownfield estates. These provide access to and from Chrisp Street Market and the DLR line in the west, and towards new leisure opportunities and bridge crossings at the River Lea in the east. The interventions also create a north-south ‘spine’ from Devas Street to the A13 along Violet Road, Morris Road and Chrisp Street; and a further north-south route is added by policy LS11, which works towards the opening up of the River Lea path along the whole length of the area.
- 6.21. Other interventions identify areas where fast traffic can be reduced and poor road layouts improved to benefit pedestrians and cyclists – along Abbott Road, at the Leamouth Roundabout, and at the A12 slip road onto the Teviot estate. A series of changes in these locations can make a drastic difference in safety and connectivity.
- 6.22. The Council will work closely with developers, Transport for London, and any other partner organisations to deliver these interventions using a range of funding sources, including through CIL payments and S106 agreements where appropriate.
- 6.23. Part C of the policy concerns the other major approach to connectivity improvements in the area, which is the Council’s aim to deliver a number of new pedestrian and cycle bridge crossings of the River Lea. These crossings will open up improved access to Newham side of the Poplar Riverside Opportunity Area, and to Canning Town, Star Lane, and West Ham stations, as well as leisure sites like Cody Dock, and will be particularly useful for residents living in the east of the AAP area, and for providing alternative routes for cyclists away from major road crossings.
- 6.24. Tower Hamlets and the London Borough of Newham are already working closely together to ensure that these bridges can be delivered, through a joint Lower Lea Valley Regeneration Board on which the mayors of both boroughs sit. We will also work closely with developers on adjoining sites to ensure suitable land is safeguarded for bridge landings.

6.25. Another bridge that is being considered entirely on the Tower Hamlets side of the river is a connector bridge that runs underneath the A13 from the Blackwall Trading Estate on the north side to the Leamouth Depot site on the south side. This would extend out into the river and run underneath the A13 bridge. The advantage of this bridge would be to open up the path along the River Lea to a greater extent, and to provide an additional crossing of the A13 without having to move inland to the complicated signalised crossing at the bottom of Abbott Road.

6.26. The Connection and Movement Study identified a much wider range of potential interventions than are included in part B of this policy. As part of the assessment process, these interventions were not ranked as top priorities. However, they would still cumulatively make a big contribution to movement across the area, and consequently the Council will also aim to deliver these interventions where resources to do so are available. This commitment is set out in part D of the policy.

6.27. Figure 12 below shows the proposed interventions set out on a map, showing the clear north-south and east-west routes that will be opened up by the proposed approach.

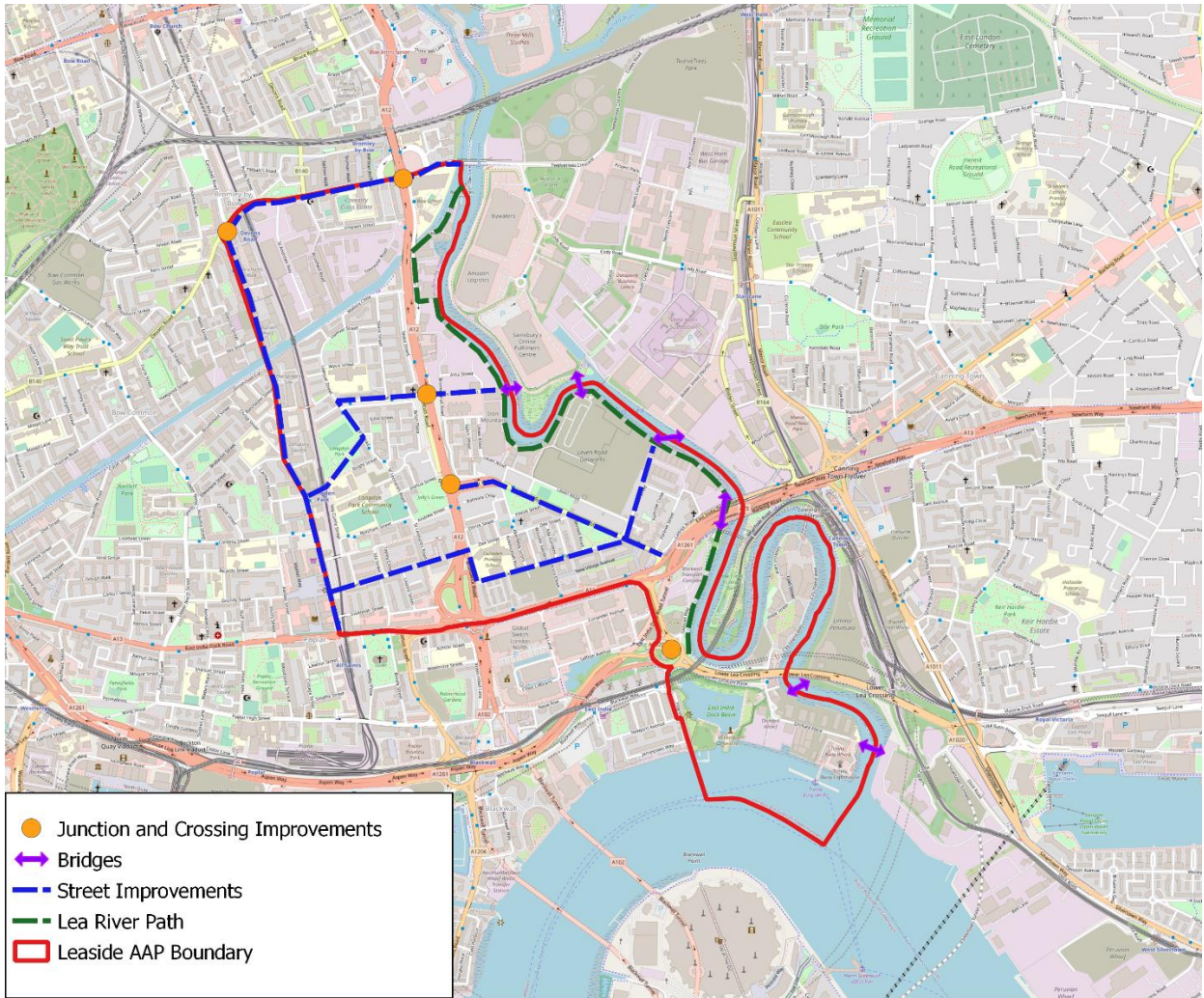


Figure 15: Proposed movement and connectivity interventions from policy LS8

POLICY LS9 – LIVEABLE STREETS

A – Teviot and Brownfield and Aberfeldy have been chosen as ‘Liveable Streets’ areas. Proposals in these areas must therefore support the delivery of liveable streets and be designed to minimise ‘rat-runs’ and shortcuts for cars.

B – Throughout the AAP area, proposals to improve the public realm outside schools and implement school street proposals will be supported, to improve safety and air quality.

Explanation

6.28. This policy helps to deliver the requirement in policy LS9 for improvements to the quality and connectivity of walking and cycling routes in the AAP area, by encouraging the implementation of proposals for safer streets within areas that are heavily residential or where schools are located.

6.29. The Liveable Streets programme will make public realm improvements and reduce rat-running in 17 neighbourhoods across the borough. Within the AAP area, the Teviot and Brownfield Estates have been identified for improvements in phase 3 of the programme, and the Aberfeldy estate in phase 4. Part A of the policy requires that proposals for development in these areas should take into account their inclusion in the Liveable Streets programme, and should look at ways to minimise through routes for cars, and reduce car usage within the estates in general. This could include the use of ‘bus gates’ to avoid disruption to public transport services while discouraging through routes for private cars. This can be supported through and early engagement with existing residents on these estates. The Liveable Streets areas with these names extend beyond the boundaries of the estates themselves or the site allocations elsewhere in this AAP. Figure 13 below shows the areas that this policy applies to.

6.30. Part B expresses support for school street applications within the AAP area. School street proposals aim to improve safety, increase the level of greenery, and reduce air pollution in close proximity to schools. As well as street closures, this can include changes to make streets more appealing such as green walls and tree planting, safety improvements like wider pavements and upgraded crossings, and encouragement for active transport such as increased cycle parking. Discussions should be held at an early stage with the Council’s School Streets team to ensure proposals are appropriate.

POLICY LS10 – PARKING

A – All new development should meet the following maximum car parking standards for residential units:

Up to 2 bedrooms	3 bedrooms and above
0 parking spaces per unit	0.1 parking spaces per unit

B – On estate regeneration schemes, the re-provision of existing parking must be justified in terms of existing parking permits held by residents who are returning to the new development. Where possible, development is strongly encouraged to reduce the number of parking spaces currently on-site.

C – All parking should be provided on-site and off-street. No new on-street parking should be provided, and where possible, existing on-street parking should be moved within the development parcel, freeing up street space for improved walking and cycling facilities.

D – All new or re-provided parking spaces (in residential or non-residential development) should be fitted with rapid electric vehicle charging facilities.

Explanation

6.31. This policy sets out a parking strategy that is specific to the AAP area, to ensure that car use in the area does not significantly increase along with the expected growth in population, and that the transport network for all transport modes is not severely impacted by the use of cars. Car parking takes up large amounts of the public realm that can be more beneficially used to provide additional space for pedestrians and cyclists, and for urban greening, especially given the relatively low levels of car ownership in Tower Hamlets.

6.32. Improvements to the walking and cycling network, and improved access via bridges to the tube stations at West Ham and Canning Town, will allow residents of the area to prioritise walking and cycling journeys above car journeys; and the implementation of low traffic neighbourhood principles will also discourage car use for shorter journeys. Reducing the amount of car traffic in the Leaside area not only has benefits for connectivity and movement, but can also positively affect the health of residents by reducing air pollution from traffic in the area.

6.33. Part A of this policy applies the same parking standards to the Leaside area as are applied in the Isle of Dogs and South Poplar Opportunity Area in the Local Plan. The AAP area provides similar opportunities for significant residential growth in the coming years (although not quite to the same level as expected on the Isle of Dogs), and it is

considered that the same parking standards should be applied to discourage new residents from expecting to be able to operate cars in the area, and to seek alternatives such as car clubs for those times when a car is a necessity.

- 6.34. Public Transport Accessibility Levels (PTAL) within the AAP area range from 1b to 4 – the same as the Isle of Dogs area to the south of South Dock. Therefore, it is considered that if these parking standards are appropriate for the southern Isle of Dogs given the amount of expected growth in that area, then they should also be applied to the AAP area. Furthermore, the findings of the modelling report of the East of the Borough Transport Study, which was based on an assumption of car-free developments, suggest that the projected residential growth in the area is not expected to cause unacceptable levels of crowding on peak-time public transport services in and around the area, further suggesting that a restriction on new parking spaces is appropriate as other modes of travel are available.
- 6.35. As part of the delivery of parking, a suitable number of parking spaces for disabled people must be provided, in line with London Plan policy T6.1. This requires that for major and strategic housing developments, 3% of homes should have access to a designated disabled persons parking space from the outset of the development. If following the tenure and unit size mix set out by Local Plan policy D.H2, this target should be achievable within the AAP parking standards. In other circumstances, a slightly higher level of parking provision may be provided only in order to meet the requirements for disabled persons parking.
- 6.36. Part B sets out that the re-provision of some parking spaces on estate regeneration developments will only be allowed where it has been fully justified in terms of allowing existing residents that already have parking permits to retain them. If residents with parking permits are not returning to the redeveloped site, the parking space they occupied should not be re-provided. Developers are expected to look into options for reducing the number of parking spaces wherever possible, and the starting point for proposals should be that the standards in part A are met.
- 6.37. Part C sets out that parking should be provided entirely within the site envelope and off-street unless there are exceptional circumstances to the contrary. As noted above, on-street parking spaces take up significant amounts of public realm across London, leading to narrower pavements and taking up space that could be used for urban greening or other amenity benefits for local residents. Developers should look for solutions to provide any car parking off-street, potentially in underground or undercroft parking bays, and should carefully consider how access is provided to these spaces to create the minimum amount of conflict between drivers and more vulnerable street users.
- 6.38. Part D of the policy sets out that all parking spaces provided as part of new development in the AAP area should be fitted with rapid electric vehicle charging

points. This goes significantly beyond the London Plan requirement of at least 20% of parking spaces to have active electric charging, with passive provision provided for the remaining spaces (that is, the ability to install active electric charging points at a later date). However, we believe that this approach is more realistic, given the government's commitment to the UK becoming a zero carbon nation by 2050; the Tower Hamlets commitment to becoming a zero carbon borough by the same date; and the government's expressed policy to ban all non-electric cars from sale by 2035⁷.

- 6.39. Given these circumstances, the requirement to have passive provision for electric charging 'in case' it is needed in the future is not considered an appropriate policy any longer. Electric vehicle charging points will be needed within the lifetime of a development, and the responsibility for installing them should be taken on now, to avoid dispute in the future over who has responsibility for upgrading all car parking spaces in developments. The increased visibility of electric charging points can also help to encourage a change in mindset among consumers, to believe that changing to an electric vehicle is feasible in the present day, rather than at some time in the future.
- 6.40. Given that the proposed policy allows only a very small number of parking spaces to be delivered on new development in the AAP area, this approach should not be onerous on developers and is unlikely to significantly affect viability.

⁷ <https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans>

POLICY LS11 – ACCESS TO WATERFRONTS

A – Proposals for development adjacent to water spaces must provide public access to the waterfront where it is currently unavailable, and must not remove any currently available access to waterfronts (including narrowing existing paths), except on a temporary basis while construction is taking place.

B – Waterfront paths should be wide enough and appropriately surfaced and lit to accommodate pedestrians and cyclists of all abilities, and provision should be made for seating at regular intervals.

C – Waterfront paths should be designed as semi-natural green corridors.

Explanation

- 6.41. The purpose of this policy is to support the development of continuous riverside paths along the River Lea and the River Thames and ensure that there is good quality public access to these paths. This will help to develop further travel corridors throughout the area, particularly a north-south spine along the River Lea that leads onto the remainder of the River Lea waterfront path that stretches north to the edge of London and beyond. The proposals for new bridges in Policy LS8 will also help to unlock access to the Lea, by increasing accessibility from both Tower Hamlets and Newham.
- 6.42. Part A of the policy requires all new development adjacent to water spaces to provide public access to the waterfront where it is currently unavailable. This access should connect the inland street network to a waterfront and provide sufficient space to walk along the river next to the new development. The only exception is where there is a physical barrier in the form of an existing building that reaches the waterfront and is not being demolished and reconstructed. In these cases, the site layout should enable people walking along the waterfront to make the shortest possible detour inland, which should consist of well-lit, attractive public realm and be directed away from vehicle traffic wherever possible.
- 6.43. Part B of the policy requires waterfront paths to be designed in such a way that the path should be safe and accessible to all pedestrians and cyclists, including people with disabilities, well-lit and of adequate width. Waterfront paths should not include unnecessary barriers to movement or cluttered street furniture. Lighting choices should be carefully considered to take into account biodiversity considerations along the riverfront as well as the visibility needs of those travelling along the paths. Seating should be provided at regular intervals to allow space for people to stop and rest.

6.44. Part C requires the delivery of waterfront paths to provide semi-natural green corridors. This means that the path should aim to use softer, permeable, non-sealed surfaces where this is compatible with the requirement of part B to accommodate people of all abilities. Planting is strongly encouraged along waterfront paths, and should take the form of meadow or prairie planting that encourage biodiversity, rather than more sterile environments like mowed grass.

6.45. In designing waterfront paths, consideration should be given to the standards set out in the Lea River Park Design Manual.

Consultation Questions – Movement and Connectivity

- Should traffic interventions continue to focus on north-south and east-west routes running parallel to the A12 and A13? Or should another approach be taken to responding to the major roads in the area? What could this approach include?
- If there are opportunities to reduce traffic levels on the A12 following the opening of an alternative river crossing at the Silvertown Tunnel, what actions could be taken to achieve this?
- Are there additional interventions that should be prioritised to improve walking, cycling, and public transport use for journeys within the AAP area, and to the surrounding areas?
- Are the suggested parking standards for the area appropriate?

7. Town Centres

7.1. The Leaside AAP area sits within a network of town centres of different sizes and roles. On the western edge of the AAP area, the eastern arm of the Crisp Street district centre spreads out along the A13 and enters the AAP area, and the northeastern portion is also within the AAP area (the bulk of the district centre, around Crisp Street Market, is outside of the AAP area). To the northwestern end of the AAP area, the Devons Road neighbourhood centre and Caspian Wharf neighbourhood parade both lie partially within the AAP area. And further to the south and east are the Aberfeldy neighbourhood centre, sited in the middle of the Aberfeldy estate; and the City Island neighbourhood centre, which covers the large new development on the Leamouth Peninsula, over the bridge from Canning Town. There are also smaller collections of shops that have not been designated as town centres, most notably the small parade on Teviot Street. Figure 14 shows the town centre hierarchy within the AAP area.

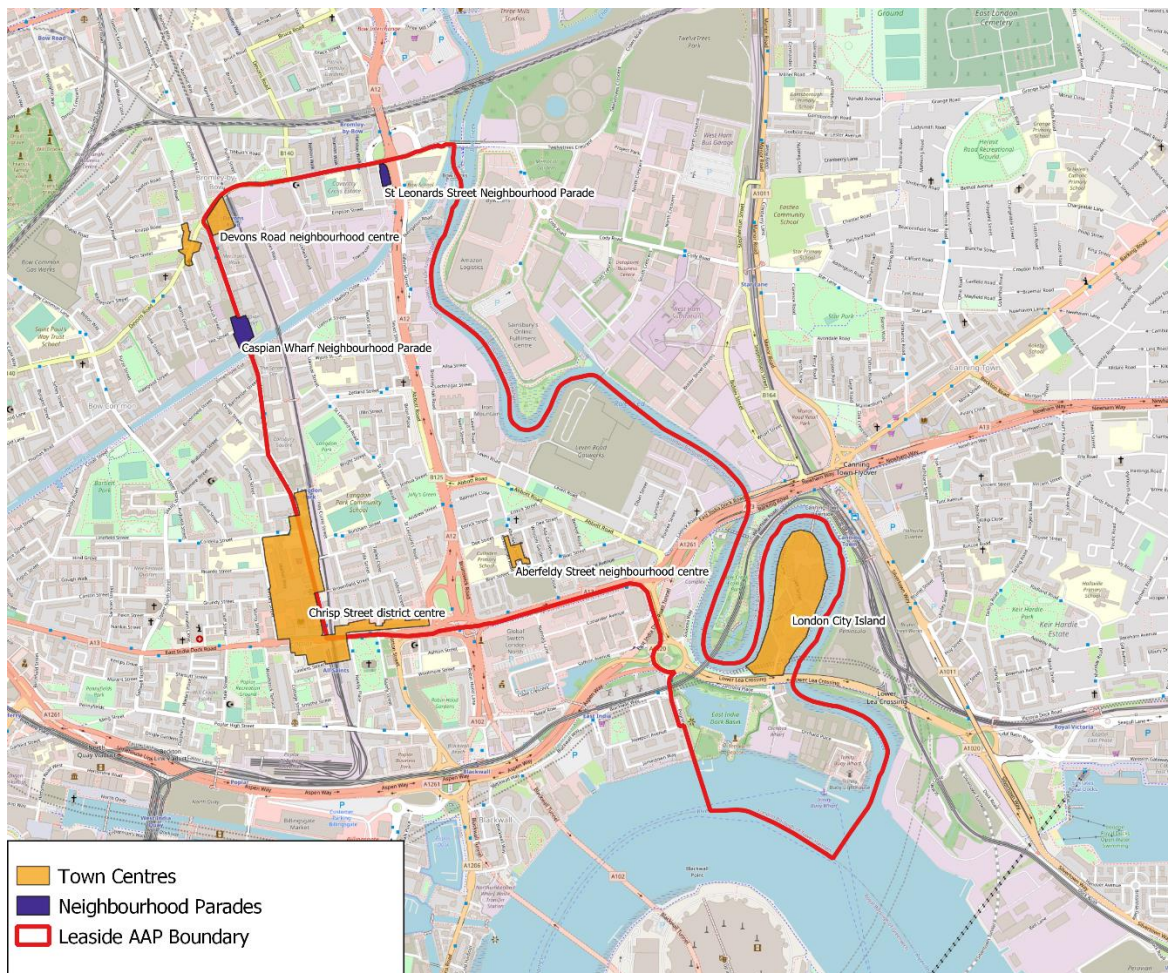


Figure 17: Town centres in the AAP area

7.2. Most of these town centres and shopping parades serve a very local catchment, which is expected to grow in the coming years as development takes place. In particular, this may see the Aberfeldy neighbourhood centre grow in importance as redevelopment of

the estate takes place, and new development goes up on surrounding former industrial sites. The City Island neighbourhood centre is the most recently designated, and serves a different role from the other centres in the AAP area, due to containing major cultural centres like the English National Ballet and the London Film School. Crisp Street district centre is the major shopping draw for the area, with a wide range of goods and services available, and it is expected that the connectivity improvements set out in chapter 6 will make it easier to reach for residents from across the Leaside area.

- 7.3. Although the AAP area will experience significant housing development and economic growth over the next 10 years, the Retail Needs Assessment undertaken as part of the evidence for the AAP found that there is already sufficient retail floorspace available and in the pipeline to support this growth. There is therefore no need to designate any further town centres within the AAP area, or to expand the existing centres.
- 7.4. However, there is still a need to consider how our town centres will change during the plan period. In regional and nationwide trends, high streets are becoming about more than just shops and are instead seen as destinations for socialising and spending extended periods of time. Recent changes to the Use Classes Order to amalgamate a number of previously separate uses into a single 'town centres' use class also reflect this, allowing town centre units to more easily change between restaurants, offices, leisure uses, and more. While this has added flexibility for businesses, it has also raised the question of the role of planning and how planning can help to put forward and support a new vision for town centres. Policy LS12 sets out a new approach to town centre uses in the light of these recent changes.
- 7.5. In light of the finding that the AAP area already has enough retail space planned to cater for the expected population growth, the Retail Needs Assessment provides a recommendation that the Council's focus should be on ensuring that town centres remain attractive, accessible and relevant places in the context of changing retail trends and rapidly developing surroundings. The recommendations from the report are set out in policy LS13, with a particular focus on improving accessibility to the existing town centres. This will help to address some of the connectivity and accessibility issues identified in the AAP area, and ensure that as the area develops, all residents live within a '15 minute city' – where all of their daily needs can be met within a short amount of time walking or cycling.

7.6. Key pieces of evidence for this chapter include:

- East of the Borough Retail Needs Assessment (2020)
- Lower Lea Valley Connection and Movement Study (2020)

POLICY LS12 – TOWN CENTRE USES

A – Within town centres, proposals for use classes E and F1 will be supported. Community halls, meeting places, and indoor swimming pools under use class F2 will also be supported. The loss of these uses in town centres will be resisted.

B – Sui generis uses that might be appropriate in neighbourhood and district centres, such as pubs, cinemas, bingo halls, concert halls and dance halls will be supported in neighbourhood centres, if it can be demonstrated that they will contribute to the vitality of neighbourhood centres and not have negative impacts on residential amenity.

C – Within neighbourhood parades, proposals for class E uses will be supported. We would not normally expect to see proposals for other use classes in neighbourhood parades, and the loss of class E uses will be resisted.

D – Where proposals come forward for community uses that sit within use class E, the Council will seek to impose conditions that retain the site as a community use until planning permission is granted for another use. This applies to medical and health services, and creches, day nurseries and day centres under class E.

Explanation

7.7. This policy reflects the recent changes in the Use Classes Order that have combined a number of town centre functions into the new use class E. This has created a situation where the majority of units within town centres will now be class E, and will be free to change between the various class E uses without the need for planning permission. This could mean shops changing to restaurants, offices changing into gyms, estate agents turning into nurseries, or any number of other possible permutations.

7.8. As high street businesses find themselves in an increasingly difficult position due to the effects of the coronavirus pandemic and longer-term changes in retail trends towards online shopping, this additional flexibility for businesses is welcome to some extent. At the same time, however, it impacts on the ability to manage what uses come forward in town centres and to ensure that a range of needs are met.

7.9. Part A of this policy sets out that in neighbourhood and district centres within the AAP area (Aberfeldy, City Island, and parts of Devons Road and Chrisp Street), class E uses will be supported alongside class F1 and some class F2 uses. Two elements of use class F2 have been left out of this policy – these are small, isolated community shops, and outdoor sport and recreation areas. The criteria for the former cannot be met in a densely developed area of Tower Hamlets, as they are required to be more than 1km from the next nearest shop; the latter would not be an efficient use of town centre

land. Given the range of uses covered by class E and the importance to the community of the uses covered by classes F1 and F2, applications for the loss of these uses will not be supported.

- 7.10. Part B sets out that some other sui generis uses may be acceptable within neighbourhood and district centres. These proposals will need to clearly demonstrate how these uses will contribute to the town centre in terms of employment and in their role as anchor uses through a Retail Impact Assessment; and how any negative impacts on residential amenity will be mitigated. These uses are likely to attract customers in the evening, and can be beneficial to ensuring that town centres feel lively and populated after retail businesses have closed for the day. But they can also create amenity issues for residents with noise, littering and anti-social behaviour, and proposals will be expected to demonstrate the suitability of the proposed use for the area it is located in.
- 7.11. Part C relates to neighbourhood parades, which are generally smaller rows of what was formerly class A businesses – retail, restaurants, and, often, fast food. Within the neighbourhood parades in the AAP area (St Leonard’s Street and Caspian Wharf), the Council will support applications for class E uses, and will resist the loss of any existing class E units.
- 7.12. Some of the uses that are included in the new class E are of particular importance to the borough – specifically, medical services and early years childcare and education services. Under part D, where these uses are proposed, the Council will seek to impose conditions on them to ensure that sites remain in these uses, and cannot switch to other class E uses without planning permission. This is to ensure that the borough retains a suitable amount of these facilities to meet the needs of the community.

POLICY LS13 – TOWN CENTRE INTERVENTIONS

A – Through joint-working between the Council, developers, landowners, and existing traders within town centres, and through S106 agreements, CIL payments and other sources of funding, new development should deliver the following interventions within the town centres in the AAP area:

B – Aberfeldy Neighbourhood Centre

- i. The introduction of traffic calming measures along Aberfeldy Street, Dee Street and Blair Street
- ii. Improved permeability to the parallel streets east and west of Aberfeldy Street (Lansbury Gardens and Kirkmichael Road)
- iii. Enhanced pedestrian crossings on Aberfeldy Street
- iv. Increased greenery along and around the high street, including the possibility of small 'parklets' with benches and/or play equipment
- v. Consider implementing a weekly Aberfeldy Street market to generate footfall and promote the street to the community
- vi. Encouraging the retention of recent shopfront improvements that have focused on public art, or the delivery of similarly attractive, community-focused public art on any redevelopment

C – Devons Road Neighbourhood Centre

- i. Junction re-design at Campbell Road, Violet Road and Devons Road to replace roundabouts with T-junctions, remove guard rails, and relocate pedestrian crossings closer to desire lines
- ii. Segregated cycle provision along Devons Road, including through the removal or relocation of on-street parking, to create a more shared, traffic-calmed atmosphere
- iii. Enhancements to the triangle of green space where Devons Road and Violet Road meet to create a green public square with seating, to encourage visitors to spend time in the town centre
- iv. Removal of pedestrian guard rails along Devons Road and installation of raised planters to form a more pleasant barrier between the road and the public realm in places where a barrier is still considered necessary
- v. Improving the attractiveness of shopfronts through the use of public art, such as murals on blank walls and shutters, and improvements to signage
- vi. Installation of additional bike parking on the southwestern side of Devons Road

D – St Leonard’s Street Neighbourhood Parade

- i. Maintain and, where possible, enhance the planting between the parade and the A12 to absorb noise and pollution from the road
- ii. Improved signage and lighting for the subway underneath the A12, to improve access to and from the parade
- iii. Signalise junction of Devas Street, A12 and Twelvetrees Crescent, and open up east-west movement across the A12 at this location
- iv. Installation of bike parking and seating

E – Caspian Wharf Neighbourhood Parade

- i. Traffic calming measures at the intersection of Yeo Street and Violet Street, such as a narrowing of the turning radius
- ii. Segregated cycle provision along Violet Road
- iii. Where street widths allow, the installation of planters to increase greenery
- iv. Where street widths allow, the installation of increased bicycle parking

F – The Council will support proposals for ‘click and collect’ facilities within town centres and neighbourhood parades, in the form of lockers or as part of town centre units, as long as suitable demonstration can be made that deliveries to these facilities will not impact negatively on the highways network. In the case of on-street lockers, proposals must also demonstrate that the positioning of the lockers will not obstruct pedestrian movement.

Explanation

7.13. This policy sets out a number of recommendations taken from the Retail Needs Assessment prepared for the AAP. This study concluded that no additional retail space was needed, and there was therefore no need to expand existing town centres or designate new ones. Instead, it recommended that interventions to the public realm should be the key focus of improving town centres, to help attract footfall and make them appealing places for visitors to undertake a range of activities. A number of these improvements overlap with the recommendations of the Lower Lea Valley Connection and Movement Study.

7.14. Part A sets out that these improvements may be delivered directly as part of new developments within town centres, or delivered by the Council through other sources of funding such as CIL payments.

7.15. Part B sets out a range of improvements to the public realm of Aberfeldy neighbourhood centre, including traffic calming measures, improved permeability and crossing facilities, and increased greenery. The neighbourhood centre will be part of the

expected redevelopment of the Aberfeldy estate, providing a perfect opportunity to rethink the design and layout of this town centre to reduce traffic and create a more pedestrian-focused environment. It is envisaged that the street will still have vehicle access to retain the important bus service that passes through – but other types of vehicle access will be restricted to some extent. Combined with further east-west connectivity improvements set out in chapter 6, this redevelopment can revitalise Aberfeldy neighbourhood centre, turning it into a key location and gathering place for local retail and community uses.

- 7.16. Part C sets out improvements to the Devons Road neighbourhood centre. It is recognised that some of these improvements fall slightly outside the AAP boundary, but it is considered appropriate to recognise the Council's aims here across the whole town centre, as well as to recognise the importance of connections between the AAP area and the rest of the borough. The proposals are focused on improvements to the public realm in the town centre, where guard rails currently dominate, and a triangle of open space goes underutilised; and traffic calming and the encouragement of walking and cycling.
- 7.17. Part D sets out improvements to the St Leonard's Street neighbourhood parade. This is a small row of shops that suffers from a location along the A12, which creates a noisy, polluted and hard-to-access environment. There is a limited extent to which this can be mitigated, but new and improved connections across the A12 at both the northern and southern ends of this parade could significantly increase footfall at this location, and additional facilities for cycle parking and seating could also encourage more visits.
- 7.18. Part E sets out improvements to Caspian Wharf neighbourhood parade. This area has been redeveloped relatively recently, giving it a more modern feel than some of the other town centres in the area. However, cars move quickly along Violet Road, creating a hazard for pedestrians and cyclists, and the Council will look to implement interventions that can increase road safety around this parade.
- 7.19. No specific interventions are provided for the City Island neighbourhood centre, as the area is still in the process of developing as the homes around it are completed.
- 7.20. Part F explains the circumstances under which 'click and collect' facilities for collecting online orders will be supported in town centres and neighbourhood parades. Given the increasing growth of online retailing, it is a priority to try and reduce individual deliveries around the borough by providing alternative, convenient methods of collecting parcels. This could be in the form of on-street lockers, or as an ancillary function provided by existing businesses in town centres. These facilities can add to the appeal of town centres, providing a convenient place to pick up a delivery while also visiting local shops for groceries or other daily needs. This may be particularly useful as the return to the office builds following the coronavirus pandemic, and residents may no longer find themselves available for home deliveries to the same extent.

Consultation Questions – Town Centres

- Is the approach to town centre uses in policy LS12 an appropriate response to recent changes to the Use Classes Order? Will this ensure that town centres in the area are viable, appealing locations for surrounding communities? If not, what else can be done?
- The AAP proposes not to designate any further town centres or to expand existing town centres, but to instead focus on improving connectivity and public realm around existing town centres – is this the right approach for the area?
- Are there additional interventions to the town centres that should be included in policy LS13?

8. Environment and Sustainability

- 8.1. In March 2020, Tower Hamlets Council announced a climate emergency, and adopted a Net Zero Carbon Plan for the borough. This plan commits that carbon emissions under the Council's direct control (such as from Council-owned and operated buildings and vehicles) will be reduced to net zero by 2025, and for the whole borough to be net zero carbon by 2050. This latter target is in line with the nationwide target of being a net zero carbon country by 2050, which was announced in June 2019⁸.
- 8.2. Tower Hamlets is a low-lying borough that will severely suffer from increased flooding if the effects of climate change are not mitigated in the coming years – and the Leaside AAP area is particularly at risk, with almost all of the area south of the Limehouse Cut canal sitting within a flood risk area.
- 8.3. There is an increasing weight of evidence that the built environment is a major contributor to greenhouse gas emissions, both in Tower Hamlets and the nation as a whole, and this is something the planning system can begin to address. The Intergovernmental Panel on Climate Change (IPCC) Working Group 3 Fifth Assessment Report (2014) noted that the built environment sector was responsible for 19% of all greenhouse gas emissions worldwide in 2010⁹. However, the Tower Hamlets Zero Carbon Plan estimates that buildings and towns made up approximately 31% of the borough's emissions in 2016, and that the overall level of emissions from this sector would barely decrease at all by 2050 under a 'business as usual' scenario.
- 8.4. Sustainability was also one of the three key themes for the area that emerged from early engagement on the AAP. This was partly because of people's understanding of the impacts of climate change on their area and the wider world, but also because the benefits of taking action on climate change can be felt more widely in people's health and quality of life through improving air quality, providing more greenery, and increasing access to quality water spaces.
- 8.5. The Tower Hamlets Local Plan already contains a strong suite of policies on environmental issues, but it was felt that more could be done to strengthen policies in particular areas. This chapter therefore contains two policies that update the Council's position on zero carbon housing (LS14) and biodiversity (LS15). We are also interested in exploring the possibility of introducing a policy on sustainable construction, building on the initial work undertaken by the London Plan, and would be interested in hearing your views on what such a policy could look like and what evidence might be available to support it.

⁸ <https://www.legislation.gov.uk/uksi/2019/1056/contents/made>

⁹ https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_chapter9.pdf, p678

8.6. As mentioned above, moves to address climate change are intimately connected with improvements in people's health and quality of life, and we want sustainability to be a thread that runs throughout this Area Action Plan. To achieve this, a number of policies in other chapters also address sustainability issues – for example, through the introduction of electric vehicle charging points, improving connections for pedestrians and cyclists, and improving the quality and quantity of open space in the area.

8.7. Key pieces of evidence for this chapter include:

- East of the Borough Biodiversity Issues Paper (2020)
- Tower Hamlets Net Zero Carbon Plan (2020)
- Towards Net Zero Carbon: Achieving Greater Carbon Reductions On Site (2020)

POLICY LS14 – ZERO CARBON DEVELOPMENT

A – Residential development within the AAP area is required to achieve zero carbon development through a minimum 60% reduction in regulated carbon dioxide emissions on-site, with the remaining regulated carbon dioxide emissions to be offset through a cash in lieu contribution.

B – Non-residential development within the AAP area is required to achieve zero carbon development through a minimum 50% reduction in regulated carbon dioxide emissions on-site, with the remaining regulated carbon dioxide emissions to be offset through a cash in lieu contribution.

C – New residential development should not include any heating systems based on fossil fuels, for example gas boilers or gas-fired CHP systems.

Explanation

- 8.8. This policy provides an update and a strengthening of policy D.ES7 from the Tower Hamlets Local Plan in the light of the most recent evidence of what is achievable and in response to updated local policy on greenhouse gas emissions. In particular, the Tower Hamlets Zero Carbon Plan (2020) states that carbon offsetting should be a short-term approach, but “the focus should be on eliminating reliance on fossil fuels and reducing emissions in the first place” and that “where it is possible to reduce greenhouse gas emissions locally or nationally this must be done”.
- 8.9. As a statement of local policy, the Zero Carbon Plan should be treated as a material consideration in planning decisions. In addition to this, legislation also supports local authorities taking stronger action on climate change, through the amendment of the Climate Change Act requiring the UK to be net zero carbon by 2050. The Planning and Compulsory Purchase Act 2004 also requires development plan documents to include policies designed to ensure that planning contributes to the mitigation of climate change (section 19).
- 8.10. A focus on reducing carbon emissions at source is required if the nation is to meet this zero-carbon target in an ecologically and financially sustainable manner. Carbon offsetting costs for new development are usually based on offsetting emissions for 30 years, taking us up to the 2050 deadline for a zero-carbon borough. The assumption is that by 2050 the electricity grid will be completely decarbonised, thus meaning that homes built today will no longer be contributing to emissions in 2050, and will have offset the emissions they released in the meantime. However, the more efficient that new homes can be from the beginning of their lifespan, the more quickly and effectively the net zero carbon target can be reached, and the greater impact we can have on mitigating climate change. By reducing on-site electricity loads, energy bills for

occupants can also be reduced – an important element in ensuring that housing remains affordable in the borough.

- 8.11. The report ‘Towards Net Zero Carbon: Achieving Greater Carbon Reductions on Site’, prepared in May 2020 on behalf of five London boroughs, looks at the on-site carbon savings that can be made through a number of simple interventions including heat pumps and low energy fabric and ventilation system, across a range of housing typologies including high-rise buildings. This report concludes that for residential buildings, a 60% reduction on-site should be easily achievable; and that on non-residential buildings, a 50% improvement on-site is achievable.
- 8.12. On this basis, parts A and B of this policy increase the Local Plan target of 45% of carbon emissions reduced on-site to 60% and 50% respectively for residential and non-residential uses in the AAP area. These are the minimum reductions that should be achieved on-site, and higher reductions are encouraged, and will be incentivised through the pricing of carbon offsetting. The Towards Net Zero Carbon report suggests that on-site reductions of up to 96% are possible in residential schemes with the use of best practice heat pumps and ultra-low energy fabric and ventilation systems, and developers are strongly encouraged to demonstrate their commitment to higher quality places by going beyond the minimums set in this policy.
- 8.13. The reductions required in parts A and B of this policy are based on the most up-to-date building regulations and greenhouse gas conversion factors available at the time of writing (February 2021). These are the Building Regulations and Approved Documents most recently updated on 21 April 2016¹⁰, and the Greenhouse Gas Reporting Conversion Factors published on 17 July 2020¹¹. If updates are made to these documents, we will continue to seek an equivalent reduction to that set out in the policy.
- 8.14. This policy approach will be viability tested before the Regulation 19 consultation, and the viability assessment is intended to assume a carbon offset price of £95 per tonne as used in the viability assessment of the London Plan.
- 8.15. Part C of this policy requires that new developments should not include heating systems that are intrinsically linked to fossil fuel consumption, but should instead rely on electric or other systems that can more easily be operated using renewable energy sources. As with the first two parts of the policy, this is in line with local and national goals to phase out greenhouse gas emissions over the next 30 years. The emission reduction scenarios featured in the ‘Towards Net Zero Carbon’ report suggest that it is very difficult to reach the requirements of parts A and B of this policy while installing gas boilers. There is also a long-term strategy to decarbonise the electricity grid, but no

¹⁰ <https://www.gov.uk/government/collections/approved-documents>

¹¹ <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2020>

such similar plan for decarbonising gas, further showing the importance of phasing gas boilers out in order to achieve the remaining savings to reach net zero carbon by 2050. The use of gas boilers also contributes to the release of air pollutants, negatively affecting air quality – given the already poor air quality in parts of the AAP area that are close to main roads, it is vital that the situation is not worsened.

POLICY LS15 – URBAN GREENING FACTOR

A – Development is required to meet an urban greening factor target of 0.4 (for residential development) or 0.3 (for non-residential development), based on the factors set out in this policy.

B – The calculation of the urban greening factor is normally limited to improvements within the site envelope. However, given the importance of biodiversity improvements along the River Lea and Limehouse Cut canal, developments that can deliver biodiversity improvements to these features will be allowed to count these improvements towards their urban greening factor score even where they are outside of the site envelope. In such cases, at least 50% of the area counted towards the urban greening factor score should be on-site.

C – The urban greening factors for the AAP area are as follows:

Surface Cover Type	Factor
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1
Native wetland vegetation established in an area of adjacent river or canal which previously lacked vegetation	1
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area for the mature tree.	0.8
Mixed native hedges (line of mature shrubs, two shrubs wide and comprised of at least five native shrub species)	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) that meets the requirements of GRO code 2014.	0.7
Flower-rich perennial planting.	0.7
Rain gardens and other vegetated sustainable drainage elements.	0.7
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6
Green wall – modular system or climbers rooted in soil.	0.6
Allotment gardens or similar community or residential growing spaces.	0.6
Shrub planting (including hedges that don't meet the definition of native mixed hedges)	0.5
Groundcover planting.	0.5
Amenity grassland (species-poor, regularly mown lawn).	0.4

Extensive green roof of sedum mat or other lightweight systems that do not meet GRO code 2014.	0.3
Water features (chlorinated) or unplanted detention basins.	0.2
Permeable paving.	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0

Explanation

8.16. The urban greening factor policy is based on Policy G5 of the London Plan, which allows boroughs to develop a tailored approach to the factors set out in that policy to encourage amenity space, enhance biodiversity, address the urban heat island effect, and provide sustainable drainage.

8.17. The London Plan explains that the urban greening factor for a proposed development is calculated using the formula:

$$(\text{Factor A} \times \text{Area}) + (\text{Factor B} \times \text{Area}) + (\text{Factor C, D, etc} \times \text{Area}) / \text{Total Site Area}$$

8.18. A site of 1,000sqm total area which provides 600sqm of extensive green roof, 250sqm of hard sealed car parking, 100sqm of open water, and 50sqm of amenity grassland would score as follows:

$$(0.7 \times 600) + (0 \times 250) + (1 \times 100) + (0.4 \times 50) / 1000 = 0.54$$

8.19. This would exceed the target score of 0.4 and therefore meet the requirements of the policy, and provide a number of benefits to the health and wellbeing of residents.

8.20. Part A sets out our approach to the urban greening factor in the AAP area. Unlike the London Plan policy, this is intended to be applied to developments of all sizes, and the non-residential approach does not exclude B2 and B8 uses. Given the urgency of the climate crisis, its effects on biodiversity and flood risk, the presence of a large area of deficiency of access to nature in the centre of the AAP area, and the importance of providing additional green spaces throughout the borough, we feel this approach is justified. Given the relatively small target for non-residential uses, and the introduction in part B of the policy of the possibility of utilising space outside the site envelope, we also do not feel this is an onerous target for industrial developments to reach.

8.21. Part B of the policy highlights priority areas for biodiversity improvements around the River Lea and the Limehouse Cut Canal. Under normal circumstances, improvements under the urban greening factor should be delivered on-site, as the assessment is based on total site area. However, these two priority sites are publicly

administered and would not normally be included in the site envelope of a development proposal – making it harder to incentivise the delivery of improvements.

8.22. Therefore, where delivery of biodiversity improvements can be secured within the AAP area at these two locations as part of a development proposal, we will count these improvements towards the urban greening factor score (of 0.4 for residential and 0.3 for non-residential development), while still basing the calculation on the overall site envelope area. This will allow developers to boost their urban greening factor score through interventions to these priority sites where there are constraints on improvements within their own site envelope. In such situations, at least 50% of the area counted towards the urban greening factor score (i.e. areas that score above 0 on the factor chart) should still be on-site, to ensure that on-site biodiversity and greening is not neglected in favour of ‘easy wins’ on the river and canal.

8.23. Improvements to the two priority areas will be subject to discussions with relevant third parties including the Port of London Authority, the Canal and River Trust, and the Lea Valley Regional Park Authority.

8.24. Part C sets out the factors to be used in calculating the urban greening factor score for developments. This table is based on table 8.2 of the London Plan, but with the following changes:

- Addition of native wetland vegetation along rivers and canals to support the approach taken in part B. Given the high priority of these areas, interventions of this kind have been given the highest possible factor.
- Addition of allotments and growing spaces, to encourage delivery of these kinds of spaces on new developments. These spaces do not provide as high a biodiversity benefit as wetland habitat creation, but provide similar benefits to groundcover planting with additional social and community benefits, and have therefore been given a slightly higher factor than groundcover planting. These spaces should ideally be located on ground level, but rooftop growing spaces may also be appropriate where they are made widely accessible to residents and the surrounding community.
- Hedges have been separated into mixed native hedges, and other kinds of shrubbery planting. The former are felt to provide a much higher biodiversity benefit than the latter, and this has been reflected in the scoring.

POLICY LS16 – SUSTAINABLE CONSTRUCTION

A – All major and strategic developments should submit Circular Economy Statements covering the issues raised in London Plan policy SI7.

- 8.25. The Council believes the two policies above provide a clear and simple way to do more on environmental issues within the AAP area, by requiring developers to achieve greater carbon emission reductions on site, and encouraging the delivery of additional greenery and biodiversity improvements across the area. These two policies are based on existing policy frameworks in the Tower Hamlets Local Plan and the London Plan, while stretching beyond the approaches taken by those other plans.
- 8.26. However, we believe there may be the opportunity to go further still, by introducing a policy requiring more sustainable construction methods and a greater accounting of the ‘embodied’ carbon emissions within buildings. These are the emissions that are created through the development of building materials, the construction process (including emissions from construction vehicles, which also effect local air quality), and the demolition of existing buildings to put up new development.
- 8.27. London Plan policy SI7 encourages development to take a ‘circular economy’ approach, which means looking at how energy is used throughout the whole life cycle of a building, not just during its operation. Under the London Plan, developments that are referable to the Mayor of London (150 homes or more, over 30m in height, or built on green belt or Metropolitan Open Land) will be required to submit a Circular Economy Statement explaining how they have recycled or re-used waste arising from demolition, reduced material demands for the new buildings, put in place a plan for how to deal with waste when the new building reaches the end of its useful life, how waste production will be reduced on-site, and how performance in these areas will be monitored.
- 8.28. The London Plan encourages local development plans (such as the AAP) to apply a lower threshold for these statements – and the AAP is therefore proposing that all major and strategic developments (defined as development with 10 or more housing units; 1,000sqm or more of floorspace; or on sites of more than 0.5ha) should submit these statements.

Consultation Questions – Environment and Sustainability

- Should the AAP increase the requirement for on-site emissions reduction to 60% (for residential development) and 50% (for non-residential development)?
- Should the viability appraisal of this policy be based on a carbon price of £95 per tonne in line with the London Plan, or is there justification for using a higher carbon price to incentivise further savings?
- Is it appropriate to incentivise developers to provide biodiversity improvements to the River Lea and Limehouse Cut canal by allowing them to count these improvements towards their Urban Greening Factor score?
- Are the changes to the London Plan Urban Greening Factors appropriate? Do they accurately capture the importance of different types of greenery?
- Should the AAP require all major and strategic development (10 homes or more) to submit a Circular Economy Statement to demonstrate how they have reduced waste throughout the life of the development?

9. Community Spaces

- 9.1. Community space is important across the borough, and across London – and the need for a strong feeling of community is something that comes up regularly in engagement with residents. When we feel we are part of a community, we feel happier and more welcomed in our local area, and are able to build up support networks to help us in times of trouble.
- 9.2. But in the context of rapid change and population growth, such a feeling of community can be hard to develop or to maintain. Existing residents can feel excluded from the changes taking place in their neighbourhood, and there can be short-term pressure on local services which cause conflict between new and existing residents. Larger developments can take years to be fully built-out and occupied, leaving incomplete neighbourhoods and causing disruption from the impacts of construction.
- 9.3. With the establishment of entirely new neighbourhoods where there was previously only industrial uses, and the attraction of a younger professional demographic seeking proximity to offices in Canary Wharf, Stratford and the City of London, there is also the challenge of creating spaces where new and old residents can comfortably meet. The design of buildings and spaces can feel exclusionary if steps are not taken to make them welcoming for all.
- 9.4. Throughout this AAP, we have tried to address issues of community cohesion by encouraging good design that creates places that are open and accessible to the community and increases permeability and connectivity, through the encouragement of safer streets for pedestrians and cyclists, and through the requirement for new routes along the waterfront to create a new leisure-focused route that residents can be proud of. In this chapter we add two further policies that focus specifically on community spaces.
- 9.5. Policy LS16 sets out our expectations on the delivery of new open spaces within the AAP area; and policy LS17 encourages the use of ‘meanwhile’ and community uses in new residential developments outside of town centres, to try and encourage more of these community-focused spaces to come forward.
- 9.6. In all of these instances, we would like to see proposals developed through ‘co-production’ processes. This requires a detailed understanding of the needs of people who will use the proposed community facilities, and to involve those people closely in the design and delivery of these spaces. This can be a challenging process, and can increase the time spend on consulting people, but it helps to ensure that development delivers the facilities that are actually needed by local communities and to ensure that those communities hold a stake in the future of their area.

9.7. As well as setting out these community-focused policies through the plan, the process of developing the AAP itself can also help to contribute to a feeling of belonging to the area. In the early stages of the process, we have talked with young people from the Spotlight Centre in Langdon Park, resident associations from developments old and new, and community organisations based across the AAP area. The process of consultation on this document can now add to that engagement, and allow people to express their own hopes and desires for the Leaside area.

9.8. Key pieces of evidence for this chapter include:

- Planning and Social Cohesion Background Paper (2020)
- Responses to online consultation on open space (2020)
- Water Space Study (2017)
- Green Grid Strategy Update (2017)

POLICY LS17 – DELIVERY OF OPEN SPACE

A – The Council will support the delivery of new or expanded publicly accessible open spaces as part of the delivery of new developments. In particular, development on the Aberfeldy and Teviot estates should include an increase in publicly accessible open space. The expansion of, and improvement in the quality of, existing parks is preferred to the provision of new, smaller spaces.

B – New publicly accessible open spaces should be located in areas where passing footfall is expected, and which are linked into the Tower Hamlets Green Grid and the blue infrastructure network.

C – New open spaces should be designed with multiple potential users of different ages in mind. The following elements will all be encouraged in the delivery of new open spaces (whether publicly accessible, or communal amenity space related to housing developments):

- i. Seating areas suitable for those with restricted mobility
- ii. Areas of improved biodiversity, with native planting and a range of nectar-rich perennials that flower throughout the year
- iii. Activities that promote physical activity, such as outdoor gyms or sports facilities
- iv. Food growing spaces or community gardens
- v. The provision of waste and recycling bins

Explanation

9.9. Throughout Tower Hamlets, there is a need for more open space, and the need is particularly great within the Leaside AAP area, where the industrial heritage has left large parts of the area without a network of green spaces. There is a risk that without additional development of green space throughout the area, the increasing population will be reliant on a few larger green spaces around Aberfeldy and Teviot estates, the proposed new park on the Leven Road site, and the East India Dock Basin – which could put pressure on the biodiversity of the Basin.

9.10. On this basis, part A of the policy supports the delivery of further open spaces, and identifies in particular that there should be an expansion in green space on the Teviot and Aberfeldy estate regeneration projects. This will help to ensure that the deficiency of open space in the area does not continue to worsen as development takes place. While the provision of any new open space is welcome, our preference is for existing open spaces to be expanded where possible to provide larger open spaces that can more easily accommodate a range of uses, rather than to provide a network of smaller, less functional spaces around the area.

- 9.11. Part B sets out that the location and layout of new open space should take account of the Green Grid Strategy, which lays out a network of high-quality open spaces, streets, waterways and other routes that aim to encourage walking within the borough. Ensuring new open spaces are well-located in relation to the Green Grid will ensure that they are safely accessible to all. Further detail on the blue infrastructure network is also provided in the Water Spaces Study.
- 9.12. Part C sets out the expectations for the design and delivery of new open spaces, both publicly accessible space and communal amenity space within new developments. Open spaces should be multifunctional and intergenerational, with allowance made for the need for play, relaxation, and social interaction.
- 9.13. Seating areas are an important means of creating intergenerational spaces. Outdoor seating provides a space for people from different households to mingle and come together. Seating is often thought of as being particularly useful for older people, giving them somewhere to rest. But it also plays a social role for parents, when placed near to play equipment for children; and for young people, who want safe spaces outside the home where they can socialise. At least half of all seating areas should be designed to be suitable for those with restricted mobility, and the expectation is that the aesthetic design of seating should not overshadow its function as a place to rest, meet, talk, and observe.
- 9.14. Where new open spaces are delivered on development sites, they can contribute towards meeting the urban greening factor requirements set out in policy LS15. The urban greening factor score for a site can further be enhanced through delivery of more biodiverse green spaces. While it would not be suitable for the entire area of a publicly accessible open space to consist of dense greenery, it can be beneficial to include areas of planting to add visual interest as well as ecological improvements.
- 9.15. It is important that open spaces promote physical activity in order to give local people greater opportunities to exercise outside for free. In addition, the inclusion of outdoor exercise infrastructure helps to create an inter-generational park, that meets the needs of adults and older people, rather than just catering to children or young people through outdoor play space.
- 9.16. Community growing spaces such as allotments and orchards support healthy living and have both environmental and social benefits, as well as being in high demand in Tower Hamlets, with waiting lists of up to five years on existing allotment sites, and no existing allotment sites within the AAP area. Therefore, it is strongly encouraged for new development proposals to include growing spaces as part of the delivery of new open space. These spaces should be open to as wide a range of people as possible – new amenity space is often delivered on terraces or roofs of new developments, which may restrict public access, but they should at least be made accessible to residents of all tenures within the development itself.

- 9.17. A key message that emerged from our consultation on open spaces in summer 2020 was that a greater number of waste bins are needed in open spaces, in order to encourage people to respect their area and leave parks and other open spaces clean. Regular collection of waste from these bins will need to be an important part of any open space strategy.
- 9.18. During the process of developing the Area Action Plan, a consultation survey was used to gather comments on the use of open spaces in the Leaside area, to determine whether any of these spaces should be provided with additional protection from development. To further investigate this issue, the Council is intending to perform a review of Metropolitan Open Land in the Leaside area after the Regulation 18 consultation. This will look in detail at whether any open spaces in the area should be designated as Metropolitan Open Land – this would give these spaces the same level of protection as the green belt.

POLICY LS18 – COMMUNITY USES

A – The Council will support applications for temporary permissions for ‘meanwhile uses’ on sites that are awaiting development, subject to an assessment of the impacts of the proposed use on surrounding residential amenity.

B – The Council will support proposals for small community-focused uses in new development outside of town centres. Where these are class E uses for medical or health services; creches, day nurseries or day centres; or community-run cafes, they will be conditioned to remain in that use until planning permission is granted for a change of use.

C – Sports facilities and open spaces provided as part of new school developments should be designed so as to be able to make them available to the wider community outside of school hours.

Explanation

9.19. The Leaside AAP area is facing a significant amount of development in the coming years, including the redevelopment of existing sites. The redevelopment process can be lengthy, and can on occasion leave buildings empty and awaiting a new use for some time, which can act as a blight on the surrounding neighbourhood. However, these empty sites can also offer the opportunity for more creative short-term uses, as developers can rent them on a low- or no-cost basis to keep an area active and appealing while the wheels of the development process turn.

9.20. Part A of this policy therefore sets out that the Council will generally support applications for temporary planning permissions for meanwhile uses on sites that are awaiting development. This could include small-scale retail uses, art galleries and studios, creative employment spaces, or community uses. Permission will be subject to an assessment of the impacts of the proposed use on the amenity of surrounding residents, to ensure existing residents do not suffer from an undue increase in noise or antisocial behaviour. This could include a Noise Impact Assessment.

9.21. Part B of the policy supports the provision of small community uses in new developments outside of town centres. These could include class E uses for medical and health services, early years childcare and education, or community-run cafes, class F1 uses, class F2 community halls, or some sui generis uses where it can be demonstrated they have a community function. Proposals should demonstrate the likely demand for the proposed use, and a high concentration of similar community uses outside of town centres will not be supported. In line with policy LS12 on town centre uses, the Council will condition class E community uses to ensure they remain in that use until planning permission is granted for a change of use. This is particularly important in developments outside of town centres, not just due to the importance of community facilities to the

population of the area, but to ensure that units cannot be changed to other class E uses such as restaurants without a proper assessment of the potential impacts of such uses on the surrounding residential areas.

9.22. Part C encourages the sharing of new community facilities on school sites with the wider community, which may require a particular layout and design to be provided to make the site safely accessible to pupils during the daytime and the public on appropriate evenings and weekends. By sharing space in this way, the amount of community uses available in the AAP area can be maximised. However, proposals for the redevelopment of schools should not rely on the use of existing public open space to provide appropriate play space for the school – this is because such a proposal would turn a ‘full-time’ public open space into a ‘part-time’ space, only available to the public at certain times, and therefore essentially reduces public access to open space.

Consultation Questions – Community Spaces

- Is it right to prioritise the expansion of existing open spaces above the provision of new but smaller open spaces?
- Are there additional facilities that should be encouraged in new open spaces?
- Is it the right approach to encourage new community spaces in residential developments?
- Are there further considerations that need to be taken into account when sharing community facilities between schools and the community?

Appendix A – Consultation Questions

The consultation questions from the AAP chapters are collated here for ease of reference. These questions represent particular topics that we are looking for responses on, but your response to the consultation does not have to be limited to these questions – please let us know your thoughts on any element of the AAP.

The consultation runs between 7 April and 21 May 2021. Full details can be found on <https://talk.towerhamlets.gov.uk/leasideplan>, and responses can be submitted via the website, by email to planmaking@towerhamlets.gov.uk, and by mail to Strategic Planning Team, Tower Hamlets Town Hall, Mulberry Place, Clove Crescent, E14 2BG.

Consultation Questions

Introduction

- Is the name Leaside suitable for the area covered by the AAP? Do you have any other suggestions for what the AAP area should be called and why?

Context

- Has this chapter appropriately captured the context of the Leaside area? Is there anything that should be added to enhance a reader's understanding of the spatial or policy context of this plan?
- Are the boundaries of the AAP area appropriate? If they should be changed, why?

Vision

- Do the themes presented in this section set out an appropriate vision for the Leaside AAP? Are there elements of the vision that should be changed? Are there any other themes that should be added to the vision?

Housing Delivery

- Is the strategy of focusing new housing on estate regeneration projects and redevelopment of some industrial land appropriate? If not, what alternative approach should be taken?
- Are there additional site allocations that should be included in the plan?
- Should the site allocations include indicative housing capacity figures and/or indicative building heights, based on a design-led capacity assessment of each site?
- Are the design, connectivity, and delivery criteria on the site allocations appropriate? If not, what should be changed?
- How can proposals for development best demonstrate that they have optimised capacity? Are there specific instructions that should be provided on undertaking design-led capacity assessments, beyond that provided in the London Plan and its supporting guidance?

- How can development along busy road corridors best respond to that context? Is it appropriate for estates to begin to ‘open up’ in relation to the road corridors, in anticipation of future changes to these roads; or should they continue to ‘turn inwards’ and face away from the roads?
- How can the industrial heritage of the AAP area be reflected in design of new developments?
- What role should tall buildings play in delivering new homes within the AAP area? Are there any parts of the AAP area, outside of the designated Leamouth Tall Building Zone, that are suitable for tall buildings, or which would be particularly sensitive to the impacts of tall buildings?

Employment

- Is the approach of maintaining Empson Street exclusively for employment uses appropriate? Is it appropriate to encourage redevelopment of the site for intensified employment uses?
- Is the approach of encouraging co-location of residential and light industrial uses on the Blackwall Trading Estate appropriate?
- Are there further design factors that need to be considered to make residential uses acceptable on the Blackwall Trading Estate? Or to better deliver the co-location of residential and employment uses on other sites?
- Are there additional employment-led site allocations that should be included in the plan?
- Is the approach to retaining employment uses in policy LS5 the right way to deal with recent changes to the Use Classes Order? Will this approach ensure that employment space is adequately protected in designated employment locations?
- Is the approach to providing smaller, more flexible industrial workspaces appropriate in this area? If not, what strategy would be more suitable?
- What further details should a Commercial Strategy Statement include?

Movement and Connectivity

- Should traffic interventions continue to focus on north-south and east-west routes running parallel to the A12 and A13? Or should another approach be taken to responding to the major roads in the area? What could this approach include?
- If there are opportunities to reduce traffic levels on the A12 following the opening of an alternative river crossing at the Silvertown Tunnel, what actions could be taken to achieve this?
- Are there additional interventions that should be prioritised to improve walking, cycling, and public transport use for journeys within the AAP area, and to the surrounding areas?
- Are the suggested parking standards for the area appropriate?

Town Centres

- Is the approach to town centre uses in policy LS12 an appropriate response to recent changes to the Use Classes Order? Will this ensure that town centres in the area are viable, appealing locations for surrounding communities? If not, what else can be done?

- The AAP proposes not to designate any further town centres or to expand existing town centres, but to instead focus on improving connectivity and public realm around existing town centres – is this the right approach for the area?
- Are there additional interventions to the town centres that should be included in policy LS13?

Environment and Sustainability

- Should the AAP increase the requirement for on-site emissions reduction to 60% (for residential development) and 50% (for non-residential development)?
- Should the viability appraisal of this policy be based on a carbon price of £95 per tonne in line with the London Plan, or is there justification for using a higher carbon price to incentivise further savings?
- Is it appropriate to incentivise developers to provide biodiversity improvements to the River Lea and Limehouse Cut canal by allowing them to count these improvements towards their Urban Greening Factor score?
- Are the changes to the London Plan Urban Greening Factors appropriate? Do they accurately capture the importance of different types of greenery?
- Should the AAP require all major and strategic development (10 homes or more) to submit a Circular Economy Statement to demonstrate how they have reduced waste throughout the life of the development?

Community Spaces

- Is it right to prioritise the expansion of existing open spaces above the provision of new but smaller open spaces?
- Are there additional facilities that should be encouraged in new open spaces?
- Is it the right approach to encourage new community spaces in residential developments?
- Are there further considerations that need to be taken into account when sharing community facilities between schools and the community?